

**Joint consultation by Department for Environment, Food and Rural Affairs,  
Welsh Assembly Government and Food Standards Agency on proposals for  
changes to BSE testing of cattle slaughtered for human consumption**

1. The following response is made on behalf of the Royal College of Veterinary Surgeons (RCVS).  
The RCVS is the regulatory body for veterinary surgeons in the UK. The role of the RCVS is to safeguard the health and welfare of animals committed to veterinary care through the regulation of the education, and ethical and clinical standards, of veterinary surgeons and nurses, thereby protecting the interests of those dependent on animals, and assuring public health. It also acts as an impartial source of informed opinion on relevant veterinary matters.
2. The RCVS considers that in relation to Bovine Spongiform Encephalopathy (BSE), monitoring and controlling the epidemic and protecting the public and animals from exposure to the agents that cause BSE are of paramount importance. Nevertheless, it is important that controls and testing regimes are appropriate and proportionate to the current risks of the disease.
3. The RCVS commends the launch of this non-formal consultation before adopting the proposed changes to BSE testing made possible by the amendment to Commission Directive 719/2009/EC and the decision of Ministers to seek the opinion of the Food Standards Agency (FSA) and independent expert advice of the Spongiform Encephalopathy Advisory Committee (SEAC) on any potential risks before adopting changes.
4. SEAC comprises experts at the forefront of Transmissible Spongiform Encephalopathy (TSE) research and has provided independent expert scientific advice to the Government in a transparent fashion for 20 years. The RCVS therefore supports the recommendations and observations of SEAC in relation to the proposed changes to the BSE testing of healthy cattle and strongly urges the Government to take account of its views.
5. SEAC advises that in the short-term the additional risk to human health of raising the age for the slaughter of healthy cattle to 72 months is insignificant and notes that the Veterinary Laboratories Agency (VLA) modelling concurs with the conclusion. In presenting their advice, however, SEAC sounds an important note of caution: that such conclusions are only valid if the prevalence of BSE in UK cattle continues to fall or remains the same and that the validity of the analysis depends upon the quality of surveillance and its ability to detect any re-emergence of the disease.
6. The RCVS therefore considers it imperative that the testing and surveillance programme is kept under review and that measures are implemented to ensure that the programme is capable of identifying any changes in BSE prevalence. To this end, the RCVS considers that provision should be made for the random testing of apparently healthy animals being slaughtered between the ages of 48 months and 72 months to verify the science behind the new testing regime and to ensure that health of the public is safeguarded appropriately. In this regard, the RCVS also supports the proposal of SEAC that the VLA model should be used 'to examine a range of

hypothetical rates of increase of BSE infection and the ability of current surveillance measures to detect the change’.

7. As SEAC notes, changes in the prevalence of BSE are most likely to be detected in fallen stock and casualty animals. The RCVS therefore considers that assessments should be made to ensure the adequacy and sensitivity of such testing for identifying any emerging trends in BSE.
8. The RCVS regards the removal of Specified Risk Material (SRM) as the primary means via which the public are protected from agents that cause BSE. Whilst there are no proposals to change SRM measures, the RCVS wishes to express its strong belief that current SRM measures should not be relaxed.
9. Given recent evidence of fraud relating to cattle that are found to be TB test-positive and the Government’s moves to tackle this by requiring that DNA tags are applied immediately to cattle that test positive for TB, the RCVS considers that provisions need to be made to ensure that any fraud in relation to BSE testing is tackled and that cattle over the age of 72 months are not passed off as being younger at the time of slaughter. Such fraud could be addressed by linking the passport and ear tag to some form of biological indicator of age such as the ossification of the vertebrae or appropriate dental changes.
10. If you require any clarification on the above comments, please do not hesitate to contact me. Alternatively, representatives from the RCVS would be happy to meet with you to discuss and expand upon our position

Anthony Roberts  
RCVS Policy and Public Affairs Officer