AHDB response to the DEFRA consultation on proposals to stop BSE testing of healthy slaughtered cattle in England and Wales from 1 January 2013

The continuous reduction in BSE cases, not only in the UK but across the EU, signals that the outbreak that peaked the UK in 1997, and in the EU in the early 2000s, has been successfully brought under control by the measures that were put in place.

Progressive changes to European legislation in recent years reflect the decreasing trend of BSE and changes to the testing programme in particular were agreed by the EU following an EFSA opinion of 13 December 2010. The first part of this proposal saw 25 member states increasing the age of testing of all healthy slaughtered cattle to 72 months from 1 July 2011. The second part considers only testing a minimum sample of healthy slaughtered cattle over 72 months from 1 January 2013 and it is on this proposal that AHDB is responding.

Therefore, in answer to the following questions:

(i) **Do you agree that it would be acceptable to stop BSE testing of ‘healthy slaughtered’ cattle born in 25 Member States? If not, please explain why.**
   - AHDB agrees that it would be acceptable to stop routine BSE testing of all ‘healthy slaughtered’ cattle born in 25 Member States. We agree that adopting the option to stop testing healthy slaughtered cattle for BSE would make BSE surveillance proportionate to risk.

(ii) **Do you agree that it is appropriate to stop BSE testing of ‘healthy slaughtered’ cattle born in 25 Member States from 1 January 2013?**
   - AHDB agrees that it is appropriate to stop BSE testing of all ‘healthy slaughtered’ cattle born in 25 Member States from 1 January 2013.

(iii) **Do you have any comments on the Impact Assessment?**
   - The impact assessment raises the question of consumer confidence and the possible impact on 3rd country trade. In terms of consumer confidence it will be important to ensure that information is available to reassure consumers if concerns are raised. AHDB’s evidence on 3rd countries is that our current testing regime implies that we are dealing with a bigger issue than exists in reality and a move to reduce testing sends a positive message.

(iv) **Are there any other comments you wish to make?**
   - AHDB believes that the proposed changes have a solid scientific basis and are in line with OIE recommendations and EFSA opinions. We believe that these changes will have a positive impact in terms of 3rd country trade as it signals a step change in the BSE status of the EU. AHDB believes that this approach needs to be extended to the measures affecting the sheep sector, in
particular the controls related to certain SRM from sheep over 12 months old, where the current controls remain disproportionate to the risk.

It is worth noting that the cost for splitting each carcase to comply with the current regulations is around £4. With around two million sheep over 12 months old slaughtered in the UK in 201, that equates to an annual cost to the industry of £8 million to comply with the current regulations.

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