

VEGA

Vegetarian Economy & Green Agriculture

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Miss Barbara Richards
The Food Standards Agency
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Re: BSE Stakeholder Group Meeting, London, Thursday, 14/09/00

I refer to misgivings in our earlier report after the meeting on 24/05/00 of the competence of these events in reviewing the controls required to overcome the BSE epidemic and "to put the consumer first" (with implications of national priority and service and to recognize that the FSA's writ, in its control of the MHS, comprehends aspects of both human and animal welfare).

1. Exchange and Assessment of Information

- 1.1 The documents and discussions for the meeting, albeit incomplete, were valuable summaries and repetitions, and the relaxation of restrictions on contributions from the audience was welcome. These latter interventions accounted for about half of the exchanges and generally reflected the greater critical and objective experience represented in the audience.
- 1.2 However, the need to rehearse issues, at great public expense, after they had been critically explored and published during the proceedings of the official BSE Inquiry, whose report - albeit delayed - is due to be given tomorrow to the Government, which in turn has undertaken to release it and its response to the public by the end of October, is lamentable.
- 1.3 Leaks of information are being published on this sharply political topic and the Stakeholders' meeting in London should have appreciated and anticipated the duplication, expense, and confusion that would be generated subsequently; the next meeting in York should be prepared for turbulence. The FSA should work to facilitate settlement of claims by relatives and guardians, present and future, to reduce the avoidable costs of litigation. In our statements to the BSE Inquiry we warned of the political implications in dealing with a new government landed with expensive responsibilities that it could impute to the errors of its predecessor of another political hue.
- 1.4 York is an apt place to hold a Stakeholders' meeting reviewing controls in the live/deadstock industry because the HQ of the MHS is situated there. It

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seemed odd that the spokesperson for the MHS was invited to the London meeting, but was limited to contribution from the audience.

2. Asserting Authority and Control

- 2.1 The MHS should give the Stakeholders a forthright view of the means of control over an industry that in some respects lives up to the traditional description of a shambles. The FSA should be given a full recital of the difficulties in enlisting vets to do the unpleasant jobs devolving on the MHS, the Service's fortunes in pursuing miscreants through the courts, and in having to cope at times with physical and other threats on staff trying to exert controls of the type the FSA expects.
- 2.2 None of the Stakeholders is notable for impatience for extension of the restraints imposed during and since the late 1980's by the MAFF. Indeed, how many went so far as to condemn local councils who took beef off school meals at the critical period? In the early days the MAFF rejected representations to ban sales of bone-in beef and oxtails. It later relented on advice from SEAC, which was agreed, albeit tepidly, by the NFU and MLC. Subsequently such scientific advice was flouted and ridiculed, and reversed. We wonder whether members of the FSA and Stakeholders command from their record the authority to control the full force of scientific advice. Rejection of the ban will result in a 2-tier system if exports are resumed in any quantity, for export-grade sold boned-out from designated slaughterhouses will contrast with output considered for the home market. Standards will apparently conflict.
- 2.3 Scrutineers of the HAS scores need reassurance that they offer the MHS the means of driving poor performers in the meat trade out of business. A firm named Cruisedeal at Manchester slaughterhouse has persistently run HAS scores of about 35. What sort of control is this? We understand that "action" is being undertaken, but it certainly isn't rapid. These difficulties are increased by changes of name and ownership, and by intricacies in the ethnic trade. The FSA's regulations on butchers' shops and licensing are welcome and reflect recommendations in 1990 from the Richmond committee (which also extended to restaurants and other places serving food).
- 2.4 The Stakeholders still have to keep pace or catch up with regulations and research arising from actions of importers and exporters and of other countries in the EU. Factors such as pithing, the safety of blood and dairy products, and spread of infection into wildlife in the environment, as well as through medical and dental interventions, have belatedly commanded attention. Such issues have occupied the BSE Inquiry and will need urgent consideration by the Stakeholders, continuing and extending research initiated by the MAFF and other agencies.

3. Constant Scrutiny of Epidemiological Evidence

- 3.1 Epidemiological testimony presented at the BSE Inquiry must be extended and scrutinized, statistics being available to both expert and lay interpreters. Genotyping has already allowed some indication of clustering. The activities of the feed and food industries spread widely; significant clusters may therefore group victims in other than geographical bounds, especially if medical causes are suspect, e.g. in diabetics using bovine insulin (rather than the hormone from pigs or “human” insulin manufactured by the action of genetically modified microorganisms).
- 3.2 Detailed epidemiology while the BSE Inquiry was in progress was limited by the statistically small number of victims of vCJD and by constraints over identification and medical etiquette. With larger numbers now the data should be amenable to wider and increasingly effective scrutiny, which the FSA should bring to the fore. The FSA should scrutinize, amplify and appraise, with participation from various disciplines, data of the type recently published in the *Veterinary Record* on the history so far of the BSE epidemic.
- 3.3 The pathologists’ dictum that “the dead shall teach the living” should assist epidemiological research into causes and factors of foodborne diseases and environmental and lifestyle influences in contexts wider than BSE and CJD. In the present connexion the FSA should adduce for Stakeholders the latest and progressing statistics and details on the following issues, as well as those of BSE and CJD, in the UK:
 - 3.3a Outbreaks of prion diseases in other species, e.g. cats and zoo animals (could it be that dogs weren’t affected because pet food was less hazardous for a time than commodities for human consumption?).
 - 3.3b Outbreaks and cases of CJD and BSE in other countries in Europe, with results from prion tests on samples at slaughterhouses.
 - 3.3c Just before the BSE epidemic seized attention EHOs and TSOs were engaged in a nationwide investigation into condemned and pet meat being passed off as fit for human consumption. Suspicion fell on knackers’ yards adjacent to slaughterhouses and of both enterprises run under common ownership. I recall a case in which cattle used in medical experiments and destined to be despatched subsequently to knackers that were traced to their actual destination at a slaughterhouse (which is still in operation) for production of “fit” beef. Plenty of manky meat circulated in the 1980s.
- 3.4 The significance of accessory factors was raised at the BSE Inquiry, concentrating on medical interventions. Dietary and lifestyle influences could include such immunological matters as consumption of protective foods, such as fruit and vegetables, toxicants such as mycotoxins, and of certain fats, which may be involved in lipid-protein interactions, for better or worse. Factors in the eruption of the symptoms of slow virus diseases and reactive arthritides are being better understood and this intelligence seems likely to avail research on prion diseases in animals and people. Progress is also being made in understanding conditions for protein folding.
- 3.5 The MHS collates data on rejections at slaughterhouses of meat and offals (as well as SRM) as unsuitable for human consumption. By negotiation with the MHS and the MAFF’s lawyers we obtained copies of these statistics a year or two ago. These postmortem results offer clues on the condition and stresses on livestock before slaughter and therefore of their enhanced susceptibility to disease. Calves and cows in the dairy/beef/veal industry, whence the BSE epidemic erupted and has persisted, suffer from birth a number of insults and

stresses that, from parallel observations in the human condition, we could expect to affect the central nervous system.

- 3.6 In allusions at the meeting to the OTMS the Stakeholders appeared unaware in the European context that the trade in cull cows and their meat to the continent is now met by exports from the Irish Republic, replacing sources from the UK. There appeared also to be some ignorance over the treatment in the UK of “fallen” or casualty livestock (e.g. downer cows, sheep with broken legs) killed on site and transported to a slaughterhouse for “dressing”, i.e. butchery, for sale as meat for human consumption, accompanied by certification from a vet under “Section19”.
- 3.7 We note that references to “5th quarter” offals in commerce (e.g. tallow, gelatin, and blood) omitted collagen, which is used in the manufacture of casings (skins) for sausages, as an alternative to intestinal sources. These materials are also used in toiletries and cosmetics and may gain entry into the gut by swallowing or into the bloodstream by absorption through the skin. Medications, pharmaceuticals, supplements, and nutraceuticals must be included in such considerations.

4. The Price. Who Pays?

- 4.1 The cost to the Exchequer of BSE and similar manifestations of imprudent husbandry in the greed for cheap food should no longer be hidden in spatchcocked subsidies. The customer should pay the true price at the till. Neither s/he nor the country at large can afford the present crassness. All parties will benefit ultimately if the FSA asserts a readjustment of the subsidies, so that all producers indemnify themselves and their customers, on a third-party basis, for harm resulting from their activities.
- 4.2 All handlers and owners of animals must be trained, examined, and licensed. As in other spheres the insurers’ fees and interest would effect policing and control and deter bad practitioners. The effect on the prices of the products would quicken the consumers’ appreciation of the benefits in ousting questionable modes of production.

5. Diagnosis, Protection, and Cure

- 5.1 Tests for latent prion infections in the people and animals are required, with the hope that these will lead to means of protection and cure. The BSE epidemic has not yet reached a scale attracting investment by pharmaceutical companies in the quest for immunization and medications. Enlistment of these forces is urgently needed, and it seems likely that funding will be required to match the competence devoted to diseases such as Alzheimer’s. It is imprudent to believe that nothing can be done practicably before the threat of prion-type infections is overcome, if ever.

Good Wishes

Dr Alan Long