

Opinion of the SSC  
on  
the additional safeguard provided  
by different culling schemes  
under the  
current conditions in the UK and  
DE.

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## **Opinion**

### **1. Mandate**

- a) Does the SSC considers it necessary to up-date its opinion on "culling" in the light of the data provided in the recent opinion on this issue provided by AFSSA? If yes, the SSC is invited to do so.
- b) Does the SSC consider, in the light of its (updated) position on culling that the measures described in the applications to allow for a derogation from the provisions of Article 12(1), 2<sup>nd</sup>, 3<sup>rd</sup> and 4<sup>th</sup> subparagraph, Article 13(1)(b) and (c), and Annex VII of Regulation (EC) No 999/2001 (see annex I)
- of 24 May 2001 by the UK;
  - of 3 August 2001 by Germany;
- offer equivalent safeguards to the above indicated provisions, insofar as these relate to BSE in bovine animals?

### **2. Scope of the opinion**

The SSC understood this question as in fact not addressing the equivalency of culling and the measures already in place in the UK or Germany but as addressing the additional safeguards provided by the culling of "at risk" animals that are epidemiological linked to BSE-index cases.

### **3. Opinion**

#### **3.1 Response to the questions raised in the mandate**

According to the opinions of the SSC and AFFSA, the probability that the above mentioned "at risk animals" are being infected with BSE is somewhat higher than for the rest of the healthy cattle population. Culling therefore can avoid that some potentially infected animals enter the human food and animal feed chain and therefore can reduce the risk for humans and animals.

The measures already in place in the UK, i.e. a total feed ban, combined with an exclusion of animals born before the feed ban, an OTMS and an SRM-ban already provide a potentially high level of safety but the SSC underlines that this is fully depending on the efficiency of the implementation of each of the above mentioned measures. However, small breaches can significantly reduce the level of safety. Under the condition that all measures mentioned before are effectively implemented, the level of safety cannot be significantly improved by culling at risk animals, as required in the TSE Regulation EC 999/2001 Article 12(1), 2<sup>nd</sup>, 3<sup>rd</sup> and 4<sup>th</sup> subparagraph, Article 13(1)(b) and (c), and Annex VII (see annex I to this opinion).

With regard to the situation in Germany, the SSC is of the opinion that, as long as animals entering human consumption are born before the total feed ban, the

combination of testing over 24 months old cattle with an SRM-ban provides a level of safety that still can be further improved by culling at risk animals that are epidemiological linked to BSE index cases.

### **3.2 Main points of justification**

The UK suggest that the measures already in place do provide a level of safety that makes it unnecessary that cattle, epidemiologically linked to a BSE index-case, would be culled. In principle, however, not culling at-risk animals would imply that some cattle could survive while incubating BSE that otherwise would be culled. However, if the measures are effectively implemented, these animals would not be older than 30 months when slaughtered for human consumption (OTMS) and their SRM would be disposed off. In addition all these cattle would be born after the total feed ban introduced in 1996, thus carrying a much lower risk of being infected than earlier birth-cohorts.

However, if herd mates of an index case, which potentially would have been culled under the requirements of the TSE-Regulation mentioned above, were infected through other routes than feed, those herd mates could enter human consumption (not animal feed) at an age of 30 months or younger. Their SRM would be disposed of. The recent SSC opinion on BSE origin and transmission, November 2001, discusses other infection routes, including the possibility of environmental contamination, for example from previously buried BSE infected animals.

On the basis of the available information it is concluded that the OTMS in combination with the SRM-ban and the total feed ban reduces effectively the risk for humans to be exposed to the BSE agent. The total feed ban also prevents recycling to cattle and therefore reduces the risk for animals. It is not envisaged that culling the birth cohort of index cases could further reduce these risks, because most of the culled animals would be too old for entering human consumption.

Also Germany suggested that culling risk animals epidemiological linked to index cases would not be necessary because of the measures in place, namely the systematic testing of all normally slaughtered cattle over 24 months and the exclusion of SRM. As in the case of UK this would imply that incubating animals that normally would be culled could enter the human food chain. For the time being, these animals are likely to be born before the total feed ban (01/01/2001) and could be older than 30 months when slaughtered. It cannot be excluded that negative tested cattle could be approaching the end of their incubation period while the PRP<sup>res</sup>-concentration in their brain is still below the detection level of the available tests. This risk increases significantly with the age of the slaughtered animals. The exclusion of SRM reduces the remaining risk but should not be seen as a sufficient guarantee. As regards to animal health risks the total feed ban prevents recycling and reduces the risk, if effectively implemented.

Under the conditions described by Germany, culling at-risk animals epidemiological linked to BSE-index cases would therefore reduce the risk for humans beyond the level that is reached with the other measures alone.