

FEDERATION EUROPEENNE POUR LA SANTE ANIMALE ET LA SECURITE SANITAIRE

FESASS



TSE Roadmap

FESASS Position paper

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The FESASS greatly welcomes from the Commission this series of amendments related to the future of the management of TSEs in the European Union, since we had several times in the past expressed our concerns on this issue, especially to the EU Council. You will find below the remarks we wanted to share with you regarding some points of the document.

1°/ AMENDMENTS IN THE SHORT AND MEDIUM TERM (2005-2009)

- **Feed ban**

We consider that, sooner or later, relaxation of the current feed ban shall occur. Indeed, this source of animal feed can be economically interesting to use, particularly with the huge demand in meat from the European livestock industry that can be foreseen. Nevertheless, before a relaxation of any kind should occur on the total feed ban (for instance lifting feed ban provisions for non-ruminants), we wanted to highlight the importance of traceability for these materials. It would be necessary to make sure that none of those would be sold or used for ruminants.

Concerning non-ruminants species, the feed ban on bone meals seems like a very strict measure, since the bones that will be used to prepare these materials come from carcasses that have tested negatively to a BSE test and of which the meat has been used for human consumption.

- **Monitoring programmes**

Considering the favourable epidemiological evolution of the BSE prevalence in Europe, we totally share the views of the Commission to reduce the number of tests applied so far. We consider that these testing should be focused on any animal at risk of exposure to BSE or to infected feed, instead of testing cohorts for which few data are available. In the future, we do believe that the monitoring programme should sample fewer animals to be able to detect any new problem arising, but should not try to gain data on cattle cohorts with no exposure whatsoever to the disease agent. Those programmes should also be applied on much older animals, since the medium age of BSE positive animals found up to now is constantly increasing. Therefore, we think that the minimal age at testing for BSE should be reviewed accordingly to the epidemiological data.

- **Review of culling policy with regard to TSEs in small ruminants**

The proposed relaxation of the culling policy for all cases where BSE is excluded in small ruminants is a measure highly expected and awaited for goat breeders, since so far they

were not able to argue any genetic resistance, unlike what is found in sheep, to avoid the culling of the entire flock whenever a case of TSE was detected.

On the other end, as long as no BSE case has ever been isolated within a flock, the increased testing regimen within infected flocks doesn't seem quite adequate. Indeed the cost effectiveness of such a measure is to be questioned.

Scrapie has to be considered, with the use of molecular discriminatory testing, only as an animal disease, with no effect on human health. According to these tests, no BSE case should now be expected to be found behind a scrapie symptomatology. Therefore any non-BSE infected flock should be dealt with strictly on an animal health perspective.

Nevertheless, we would like to stress out that the **diverse breeding programmes** to increase the genetic resistance of small ruminants to TSEs infections that have been set up all over Europe these past years should be pursued, since they can ensure a good level of safety from BSE within small ruminant flocks.

Herd testing has to be viewed as a focal action, used to check that no BSE case can be detected, at a certain point in time, whenever a TSE is suspected, whereas genotyping has to be regarded as a pro-active measure, insuring the good level of resistance of a national flock to BSE infection and infectivity. Therefore, this programme should be applied, as it is now, as soon as a non-BSE case is found in a sheep flock, in order to protect the animals from any likelihood of BSE and to increase the level of resistance towards TSEs.

Focal testing and breeding for genetic resistance will remain, according to us, of much more effectiveness than increasing tests in infected flocks.

- **Cohort culling in bovine animals**

The proposal made to adapt the cohort culling to the present epidemiological knowledge and trend of the BSE outbreak in Europe seems to us fully adapted to the situation.

2°/ AMENDMENTS IN THE LONG TERM (2009-2014)

- **Surveillance**

We do not believe that a live test, at that point in the future of the BSE outbreak, would turn out to be cost effective and easily applicable on field. This amendment is considering what could be done in the long term, i.e. when BSE is much more rare than it is now. By then, we can only hope that the BSE prevalence will be such that testing all animal with a live animal test will come out to be too expensive to remain a viable option.

In addition, excluding animals above 10 years, should BSE cases be only found in this cohort, does not apply in this period. If by then the prevalence is as low as expected, the monitoring programmes as defined previously in the first series of amendments and

applied to that type of cohort should ensure that no infectivity reaches the European consumers.

- **Certification of cattle herds**

In our point of view, dealing in the future with BSE shall not include farm certification regarding BSE status, as it is the case for Tuberculosis and Brucellosis. Since the prevalence is expected to be much lower than it is now, certification for an almost extinct disease will be too costly and will be poorly efficient to achieve anything but introducing price distortions in the beef market.

Certification for a disease is useful when the considered agent can spread easily within and between herds, not for a disease which uses the alimentary route to spread between individuals. Since such type of exposure has been controlled at the beginning of the BSE outbreak, certification will have a poor value of interest.

- **Genetic resistance in goat**

We consider that, along researching for genetic resistance in goat, all the programmes implemented in sheep to increase the resistance of the European flocks to BSE should be also valued as such and fully taken into account in any future TSE policy.