REPORT

OF AN FVO MISSION TO THE UNITED KINGDOM (GREAT BRITAIN) WITH REGARD TO IMPLEMENTATION OF COMMISSION DECISION 98/272/EC AND A FOLLOW-UP ON DATE BASED EXPORT SCHEME (20 - 24 March 2000)

Please note that certain comments from the United Kingdom Authorities have been reflected in the text in bold, italic type or as footnotes.
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Acronyms used in the text:

AHDO       Animal Health Divisional Office
ANIMO      computerised network linking veterinary authorities
BAB        Born after the (feed) ban
BCMS       British Cattle Movement Service
BOC        Bovine Offspring Cull database
BSE        Bovine Spongiform Encephalopathy
CCA        Central Competent Authorities
CII        Cattle identification inspection
CPS        Cattle Passport System
CTS        Cattle Tracing System
CVL        Central Veterinary Laboratory
DBES       Date Based Export Scheme
FVO        Food and Veterinary Office
GB         Great Britain
ICC        immuno-cytochemistry
ID         Identity (of an animal)
LVI        Local Veterinary Inspector
MAFF       Ministry of Agriculture, Fisheries and Food
MHS        Meat Hygiene Service
MS         Member state
OTMS       Over Thirty Month Scheme
OIE        Office International des Epizooties
OVS        Official Veterinary Surgeon
VO         Veterinary officer
SAF        Scrapie Associated Fibrils
SVS        State Veterinary Service
TSE        Transmissible spongiform encephalopathy
UK         United Kingdom
WB         Western Blot
I. Introduction

I.1 Mission details

The mission was carried out in Great Britain (GB) from 20 to 24 March 2000. The mission team comprised four veterinary inspectors of the Food and Veterinary Office and two Member State experts.

The programme included an initial and a final meeting with Great Britain Veterinary Services (Ministry of Agriculture, Food and Fisheries = MAFF), which is the central competent authority (CCA) and a series of visits and meetings carried out by the mission team in co-operation with CCA and regional authorities:

- DBES-unit of MAFF in Gloucester;
- Three Animal Health Divisional Offices (AHDO);
- Two slaughterhouses, one for Over Thirty Months Scheme (OTMS) cattle, one slaughtering for human consumption;
- Three cattle farms (beef/dairy);
- An incinerator;
- A knackery;
- Two private practitioners.

Representatives of the CCA accompanied the team during all visits and meetings. The initial and final meetings were held at the headquarters of the CCA. The main findings and conclusions of the mission were communicated to the CCA during the final meeting.

I.2 Scope of the mission

1. Implementation of Commission Decision 98/272/EC on epidemi-surveillance for transmissible spongiform encephalopathies in particular as regards BSE;

2. Follow-up on the implementation of Council Regulation (EC) No 820/97 establishing a system for the identification and registration of bovine animals and in particular Commission Regulation 494/98;

3. Follow-up on the implementation of Commission Decision 98/256/EC as amended concerning the export of beef under the Date Based Export Scheme (DBES).

I.3 Legal basis for the mission

The mission was carried out under the general provisions of Community Legislation, in particular Commission Decision 98/139/EC, and Commission Decision 98/272/EC, article 6.
I.4 Background

Reports from previous missions to the United Kingdom provide detailed information on the following items:

Identification, registration and tracing of bovines
- 12 to 16 April 1999, report: XXIV/1054/99
- 4 to 8 October 1999, report: DG (SANCO), 1230/99

DBES procedures at meat plants, eligibility checks
- 12 to 16 April 1999, report: XXIV/1054/99
- 4 to 8 October 1999, report: DG (SANCO), 1230/99

Incineration of bovines (offspring to BSE cases) and disposal of fallen stock (knackers yards)
- 12 to 16 April 1999, report: XXIV/1054/99

II. Findings

II.1 Provisions for emergency slaughter in GB

Most emergency slaughters are thought to be of OTMS animals. The number of OTMS animals slaughtered as emergency cases was 83,181 for GB (March 99 until February 2000).

Because of welfare considerations, most emergency slaughters are carried out on the farm and the ante mortem inspection is carried out by veterinary practitioners, who have to fill a special form, which accompanies the carcasses to the slaughterhouse or, in the case of OTMS animals, to the incinerator. The following information is recorded: animal identification, date and time of ante mortem inspection, clinical symptoms and diagnosis and signature of the practitioner.

The slaughter has to be carried out either by a practitioner, a veterinary officer (VO), a knackerman or a slaughterman. If the animal is slaughtered by a knackerman or a slaughterman, the veterinary practitioner (or VO) has to indicate on the form by when the animal has to be slaughtered. This may not exceed 24 hours. The person who slaughtered the animal has to sign the form indicating the time of slaughter.

An animal, which is sent to a slaughterhouse for emergency slaughter, has to be accompanied by a farmer declaration that it is fit for travel. At the slaughterhouse, the official veterinary surgeon (OVS) has to declare whether the carcass is fit for human consumption. In the case of OTMS animals, this is a prerequisite for entry to the scheme.

II.2 General aspects of the legislation and administrative framework

The main national legislation and administrative instructions are the following:

II.2.1. Legislation and administrative measures as regards BSE

A complete list of legal instruments related to BSE is provided on the internet website of MAFF: [http://www.maff.gov.uk/animalh/bse/index.html](http://www.maff.gov.uk/animalh/bse/index.html). The most relevant legislation in the framework of BSE eradication and epidemi-surveillance is summarised below.
BSE was made a notifiable disease in Great Britain on 21 June 1988. BSE (No 2) Order 1996, No 3183 as amended by BSE (No 2) (Amendment) Order 1999, No 921 contains the current legislative controls on BSE in GB (compulsory notification, veterinary inquiry, requirements relating to exposed animals, movement restrictions, seizure of carcasses, prohibition of sale, supply and use of milk from affected or suspected animals, cleansing and disinfecting).

Specified Diseases (Notification) Order 1996, No 2628 is the current legislation for the notification of diseases in GB. The definition of “disease” is thereby extended to comprise any form of spongiform encephalopathy not related to bovines, sheep and goats.

BSE (Feeding Stuffs and Surveillance) Regulations 1999, No 882 also allow the investigation of animals, which are not suspect of being affected with BSE. These provisions provide for continuing surveillance for BSE after the incidence of disease has fallen below the minimum number of animals which must be examined for the presence of TSEs under 98/272/EC.

BSE Compensation Order 1996, No 3184 lays down provisions for the payment of compensation to the owners of animals which are slaughtered as BSE suspects. Compensation paid is the value of the animal, up to a ceiling based on the indicative market price. The ceiling for animals, which are confirmed as suffering from BSE, is 100% of the indicative market price. The ceiling for animals, which are found not to have been suffering from BSE, is 125% of the indicative market price.

BSE Offspring Slaughter Regulations 1998 provide for the slaughter of offspring of confirmed BSE cases.

The relevant administrative instructions are described in the chapters below as appropriate.

II.2.2 Legislative and administrative measures as regards DBES

All these measures were already explained in a previous report (XXIV/1054/99). However the following amendments came into force since then:

- Chapters 22 T and 22 W were amended as regards recall provisions in case an animal is found not to have been eligible at the time of slaughter and the products of the animal were already exported: “There are no time restrictions on when recall or notification might be carried out”.

- In Chapter 22 U “Date Based Export Scheme” (dealing amongst others with recall procedures) a paragraph “Post-slaughter cattle identification report” was included. This report includes all animals which have been slaughtered at a DBES slaughterhouse in the last two weeks and for which cattle identification discrepancies have been reported since the date of slaughter.
II.3 Epidemiological situation of BSE


A brief summary of the current situation is provided below.

Figure 1: confirmed BSE-cases in GB

Since the start of the disease in United Kingdom (UK) in 1986 up to 1999, 176,443 cases of BSE have been confirmed on 35,000 farms. In 2000, until 10 March, 125 cases were confirmed while 15 results were still outstanding.

40,819 confirmed cases in GB were born after the feed ban in July 1988. None of the confirmed cases were born after the reinforcement of the feed ban on 1 August 1996.

Figure 1, based on data provided by the British authorities, shows the BSE cases in GB by year of restriction.

Until 25 February 2000 around 62% of all dairy herds and around 16% of all suckler herds experienced at least one case. In total 37.4% of all herds were affected. The annual incidence rates in 1998 and 1999 were 0.06% and 0.04%, respectively. The oldest BSE animal was older than 18 years and the youngest only 20 months.

Most of the confirmed cases were detected in agricultural holdings (farms), 697 confirmed cases were reported on markets and 667 cases in abattoirs (data from 1990-1999).

As regards the geographical distribution, England is the most affected area with 151,175 confirmed BSE cases from 1988 to 2000. Of the confirmed cases, 16,250 were in Wales and 8,167 in Scotland.

In 1999, England had 2039 confirmed cases, Wales 146 and Scotland 36. Within England, the number of confirmed cases was 760 in the South West region, 498 in the...
Midlands & Western region, 301 in the Northern region, 243 in the South East region and 237 in the Eastern region.

The overall ratio of confirmed/suspect cases in 1999 was 0,79 i.e. 21% (598) of suspects were not confirmed as BSE cases. MAFF is monitoring this ratio by comparing the results of different AHDOs.

II.4   Implementation of Commission Decision 98/272/EC as regards BSE

a) Article 1: Vigilance

All State Veterinary Service (SVS) veterinary staff have detailed operating instructions on dealing with BSE and they receive practical training in BSE diagnosis from experienced colleagues. Exchange of experience and knowledge is ensured by using officials from the most affected areas to train colleagues in areas where the disease is less frequent. Video presentations have been distributed in 1988, 1992 and 1998. All new entrant SVS veterinary staff attend an induction course, generally held once each year.

All private veterinarians carrying out work on behalf of the SVS receive training from the responsible AHDO, which includes a showing of the video presentation on BSE. AHDOs hold meetings with their local veterinary inspectors (LVIs) and other private veterinarians, usually at least once per year. AHDO staff will also attend regional meetings of their professional organisation and will provide briefings on TSEs as required.

An information leaflet was distributed to all registered cattle farmers in June 1990, revised in 1996, has just been updated again and will be circulated to all known cattle farmers in April 2000. The leaflet explains symptoms of BSE and provides details of the action that farmers should take if they notice such symptoms. To give farmers easy access to the information, further copies of these leaflets can be obtained free of charge from MAFF, and are available on the internet web-site of MAFF.

The various training activities (together with the fact, that most practitioners and farmers have personal experience of the disease) have resulted in good awareness and knowledge of clinical signs of BSE amongst all stakeholders. This could be verified during the visits to farms, private practitioners, slaughterhouses and divisional offices. Although emphasis is mostly placed on recognising typical signs of BSE, practitioners in particular seem to be aware of the need for examining animals with atypical clinical picture.

b) Article 2.1: Compulsory notification

“A person who has in his possession or under his charge an affected or a suspected animal, or the carcass of such an animal, and any veterinary surgeon or other person who, in the course of his duties, examines or inspects any such animal or carcass shall, with all practicable speed, notify the fact to the divisional veterinary manager” (The BSE (No 2) Order 1996).

The fairly generous compensation system (II.2.1, 4th bullet point) seems to encourage reporting rather than under-reporting by farmers (or practitioners). On the contrary, notifying a sick animal as a BSE suspect is a convenient and profitable way of getting rid of otherwise costly animals. Therefore, the subsequent steps taken by MAFF (see ruling out below) are to satisfy itself that the case is a genuine BSE suspect.
During the visits, the mission team could verify that farmers and practitioners in general present also atypical cases to AHDOs.

c) Article 2.2 and 3.1: Definition of a BSE suspect

a) Definition of Commission Decision 98/272/EC

Decision 98/272/EC defines a BSE suspect as a bovine animal over 20 months with behavioural or neurological signs where the disease cannot be ruled out by treatment response or following laboratory examination (art.2.2.).

The competent authority shall decide on maintaining or ruling out the suspicion on the basis of clinical and epidemiological investigations (art. 3.1.).

b) GB Definition

The Bovine Spongiform Encephalopathy (No 2) Order 1996 does not provide a specific definition of a suspect animal. The definition of “disease” in the Animal Health Act 1981 is extended to comprise BSE. The definition of “animals” is extended to comprise any kind of mammal except man and any kind of four-footed beast, which is not a mammal.

This definition is further clarified by means of administrative instructions that have to be followed in suspect cases (see “ruling out of BSE” below).

d) Article 2.2: Ruling out BSE by means of treatment response

Private practitioners in general attempt to rule out BSE before contacting AHDOs unless the case is an obvious BSE suspect. The VO can subsequently rule out BSE on the basis of anamnestic data and clinical examination. Ruling out by means of treatment response is carried out by practitioners, either before notifying the case or after the VO has examined the animal.

Two practitioners were interviewed during the mission and a number of example cases were discussed. These practitioners could describe several cases where response to treatment led either to ruling out of BSE or to notification. Despite their considerable experience in BSE, they seemed to be fairly cautious in their ruling out procedures. A few examples could be verified from the records at an AHDO.

Three VOs from two different AHDOs explained and demonstrated their ruling out procedures. All cases were well documented and the mission team could verify the following:

- All notifications received by telephone are recorded;
- All notified cases are visited and examined by a VO;
- Results of the examinations as well as justifications for the decisions made by the VO are well documented; and
- Response to treatment is frequently used to evaluate suspect cases and the response is also recorded appropriately.
e) Article 2.2: Ruling out BSE by means of laboratory examinations

Ruling out by means of laboratory examinations is carried out by practitioners either before or after the involvement of AHDOs. The most common laboratory tests applied are measuring of blood calcium and/or magnesium levels. Several examples were presented to the mission team during the visits to private practitioners.

f) Article 3.1: Movement restrictions in case of suspicion and ruling out of BSE on the basis of clinical signs (including anamnestic data) and epidemiological investigations

When farmers or practitioners notify suspects to AHDO, the notifications are recorded in a diary and visits are scheduled and prioritised according to the anamnestic data. At this second level, five different outcomes can be identified:

1) If the VO suspects that the animal is affected by BSE, he/she serves Form A (movement restriction of the suspect animal). In GB, the identity of the suspect BSE case and its progeny are entered on the BSE Offspring Cull (BOC) database and the case details are entered on the central BSE database. The progeny, if still alive and born after 1 August 1996, are also placed under restriction. If the animal either recovers spontaneously or responds to treatment during a follow–up period, the movement restriction will be lifted (by serving Form B). There is no systematic further follow-up of such cases.

2) If the VO, either during the first visit or during a follow-up, believes that the animal is a genuine BSE case, he/she serves Form C (notice of intention to slaughter). The animal is slaughtered and its brain is sent for examination to one of the approved laboratories to confirm the diagnosis. The remainder of the carcass and the head (once samples have been taken for examination) are incinerated at the Government’s expense.

3) If the VO, after clinical examination of the animal, concludes that the clinical signs are not indicative of BSE, he/she produces a negative report (Form BSE 15). This report gives details of the animal, a summary of clinical signs presented, reasons why Form A (restrictions) was not served and alternative diagnosis if possible. Such animals are not systematically followed up (see also point 1 above).

4) Particularly in cases of ‘downer cows’ or progressive conditions, where the VO is not convinced of BSE but can not exclude the disease for sure, he/she can make a recommendation for ‘Ex-gratia compensation’. This means that the animal is slaughtered under welfare grounds, examined for BSE and the compensation depends on the outcome of laboratory examination. If the animal turns out to be a BSE case, full compensation is paid. If the result is negative for BSE, the maximum payment is £ 50.

5) Movement restrictions are in some cases lifted but at a later stage, the animal is placed under restriction for a second time followed by slaughter and sampling. In 581 cases clinical signs have recurred after serving Form B (lifting of restrictions) and the animal has been sampled for BSE.

Several examples of each outcome were studied in two different AHDOs. The mission team could verify that the national rules and procedures are complied with. Eight animals falling in the category 3 above were followed up on the request of the
mission team. In some cases such animals have been destroyed shortly after the negative report without a definite alternative diagnosis or sampling for BSE.

g) Article 4: Annual report.
Annual report for 1999 was provided to the mission team.

h) Article 4, Annex A and B of Commission Decision 98/272/EC (Monitoring program)

Sampling of sub-populations

1. Native-born animals displaying clinical signs compatible with BSE
   • Animals displaying behavioural or neurological signs lasting for at least 15 days and resistant to treatment;
   • Moribund animals without signs of infectious or traumatic illness; and
   • Animals displaying other progressive disease conditions.

The first sub-population is covered by sampling official suspects. A number of these animals displayed behavioural or neurological signs lasting for at least 15 days and were resistant to treatment.

The second and third categories are covered by “Ex gratia” slaughters (see II.3. f) 4) above). The number of such examinations in 1999 was approximately 320 and the total since 1988 until March 2000 was approximately 18 300. The ‘diagnostic performance’ in this group has been around 60% during the last 9 years.

Until now, monitoring has been more or less passive i.e. sampling of the second and third categories only occurs as a ‘by-product’ of officially notified cases. Samples are not systematically collected from OTMS slaughterhouses, incinerators or knackeries in the framework of a monitoring program. The mission team could easily identify a number of cases, which would fall into the second and third sub-populations above and could have been sampled without significant additional costs.

According to GB authorities, arrangements to sample animals which are not showing clinical signs compatible with BSE in order to meet the numbers with 98/272/EC will not need to be introduced until 2001 (at the earliest).

2. Higher risk animals
   • Animals originating from countries with indigenous BSE;
   • Animals which have consumed potentially contaminated feed-stuffs; and
   • Animals born or derived from BSE infected dams and/or sires.

The first sub-population is not applicable to GB.

The second sub-population is covered by a survey carried out on animals slaughtered under the OTMS. A further survey of OTMS animals has commenced. It is planned to sample birth cohorts of BAB cases (born after 1st of January 1996).
Only offspring born after August 1996 are currently being killed under the offspring cull. According to MAFF, these animals are most likely to be negative due to their age and are therefore not examined.

**Age of the targeted animals of the sub-populations**

Most of the ‘targeted’ animals fulfil the age criteria as laid down in Annex A. In 1999, only 9 bovines out of 1850 examined, were under two years of age.

**Sample size**

The number of bovine animals examined as official suspects in 1999 was 2850. Out of this total number, 598 were non-confirmed suspects. The ratio of confirmed to suspect cases is fairly constant in different divisions. The CCA monitors this ratio of the different AHDOs.

In addition to the official suspects, 3951 OTMS animals were examined in 1999.

**i) Article 5: sampling and laboratory testing.**

The majority of brains are examined at the level of obex only. A proportion of cases have always been subject to additional examination of whole brain in Central Veterinary Laboratory (CVL) Weybridge (currently all animals born since 1.01.1995). This is to ensure that any variation in lesion profile possibly associated with new strains or routes of transmission are detected.

Currently slide reading is confined to two Regional Laboratories and CVL Weybridge, the latter being the OIE Reference Laboratory. Quality assurance procedures (blind testing of known positives/negatives) are in place to check performance. Other techniques – Scrapie Associated Fibrils (SAF), immunocytochemistry (ICC), Western Blot (WB) - are all confined to CVL Weybridge and subject to past and on-going validation in ring trials with other scientists (UK and abroad) which are aimed at maintaining expertise and comparing specificity and sensitivity.

If the initial diagnosis by histopathology is positive no second check is necessary. All inconclusive and negative results have to be sent to CVL Weybridge for confirmation or further testing using a second test. Consideration is being given to the routine introduction of ICC and/or WB for certain categories of cases.

**II.5 Cattle identification**

Details on the cattle identification system, the central database and the procedures as regards tracing of offspring are laid down in previous reports (XXIV/1054/99 and DG (SANCO), 1230/99).

**II.5.1 Administrative sanctions for holdings failing a CII**

The mission team was able to confirm on the spot that animals from holdings, which failed a cattle identification inspection (CII) (more than 20 % of the records/animals failed to meet the requirements of article 3 of Council Regulation (EC) No 820/97), would have been accepted for slaughter under the DBES if they passed DBES checks. The GB authorities confirmed that Commission Regulation 494/98 is still not
implemented in the field. This shortcoming was already mentioned in the last report (DG(SANCO)/1230/99-MR-Final).

II.5.2 Written procedures for CIIs

The instructions for field officers for carrying out CIIs were revised taking into account most of the recommendations made in the last report (DG(SANCO)/1230/99 MR-Final). The most important amendments are:

- CII reports have to be returned to the British Cattle Movement System (BCMS) within 8 working days or alternatively the identities (IDs) of DBES critical cattle can be e-mailed or notified by phone to BCMS.
- Discrepancy codes are better described
- Animal lists (herd inventories) should not be older than 3 days

A chapter dealing with sanctions such as restrictions etc. is still missing.

The revised “Instructions for field officers” contain a reference to a document called “Field Inspection Specification” which was not provided to the mission team.

The guidance (“working document: guidance on action to take in cases of serious non compliance with cattle identification and record keeping rules”) aimed to supplement the “Instructions for Field Officers”, which was provided by the GB authorities shortly after the last mission seems not to be distributed to the CII inspectors so far.

II.5.3 Re-visits of holdings which failed a CII in 1998

All holdings, which failed a CII in 1998 were revisited during the 1999 CII series. Of the 1256 holdings visited 439 (35 %) failed again. A total of more than 15,000 animals were found to have discrepancies (DBES-critical and non-critical) whereas only around 1,300 animals remain marked because their DBES-critical discrepancies could not be resolved. When a CII reveals an inaccuracy relating to an animal’s date of birth or its dam’s identity, its passport is collected and sent to BCMS for amendment. In this way, the movement of these animals is restricted until the discrepancy is resolved by amending the passport according to the information found in the holding register. If the CII reveals a problem with the animal’s movement history, the animal is flagged as ineligible for DBES on the computer database.

II.5.4 Visit to a farm

Detailed information on how CIIs are carried out is available in a previous report (DG (SANCO), 1230/99).

A beef farm was visited, which was recently inspected during the 1999 series of CIIs. An up to date herd inventory printed of the CPS/CTS database, the herd inventory the inspector used to carry out the CII and the report produced after the CII were provided to the mission team by the AHDO. The mission team checked the accuracy of the inspection result by verifying information for several randomly picked animals from

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1 GB authorities stated in their comments on the draft report that the document “Field Inspection Specification” was included in the “1999 CII Field Instructions” and was not issued as a separate document. This misleading reference will be removed from the current instructions.

2 GB authorities informed in their comments on the draft report that this document was provided to the CII teams that had to deal with such cases. This document will be included in revised procedures.
the herd inventory. Also the two herd inventories were compared in order to check if the data collected by the inspector during the CII were put on the CPS/CTS database.

The herd inventory the inspector used to carry out the CII was up to date. During the CII the inspector recorded the numbers of the replacement tags of the dams to animals born since 1 January 2000 which he found in the farm records (in total 20 dams were re-tagged). These numbers are not put on the CPS/CTS database after the CII. The farm records are kept in electronic form comprising all necessary data including the correlation of original and replacement ear tags of older animals. The farmer explained to order replacement tags via e-mail. The inspection report seemed to be accurate.

II.5.5 Re-tagging of dams, change of animal identity number

The authorities explained that farmers are obliged only to notify “new” identity numbers for animals born between 1 July 1996 and 31 December 1997 in order to issue a new passport if the identity number changes. These “new” identity numbers are recorded in the database. *Animals registered since 1 January 1998 must retain a unique identity number.*

For the tracing of offspring to BSE-suspected animals born before 1 July 1996 the holding register has to be consulted because the suspects could have been re-tagged with new identity numbers in the past.

II.6 Date Based Export Scheme

II.6.1 Experience gathered with the DBES

Up to 16 March 2000, pre-movement eligibility checks for around 34,000 cattle were performed. Nearly 6,000 failed initial checks (late passport application, outside age range, animal identification discrepancies, offspring) and for around 9,000 dam survival could not be established. As result around 19,500 (57 %) animals passed the pre-movement checks.

So far, 164 animals were rejected during the pre-slaughter check in the abattoirs for several reasons: no ear tag, wrong animal (not corresponding to delivered passport), not all movements recorded in the CPS passports etc.

So far no carcass had to be removed from the chill or cutting plant of DBES approved premises following the 24 hours post slaughter check.

Less than 10,000 animals were slaughtered under the DBES up to 16 March 2000.

Only for a very limited number of animals (less than 20) dams survival was confirmed using the LVI attestation.

II.6.2 Visit to a DBES approved slaughterhouse and cutting plant

The different control steps to be established in DBES premises were already described in earlier reports (XXIV/1054/99 and DG (SANCO), 1230/99).

The slaughterhouse and the attached cutting plant visited were approved in September 1999 and belong to a company which owns also other slaughterhouses and cutting plants producing meat for the domestic market. Red offal is correlated to individual animals but not exported so far. Green offal is collected in daily batches.
Both premises – the slaughterhouse and the cutting plant – were audited twice by a specialist VO (divisional audits) of the responsible AHDO and once by a regional auditor. In general the auditors were satisfied with the procedures in place and the performance of the Meat Hygiene Service (MHS) and plant staff. Several recommendations were made on details in order to improve the whole process.

II.6.2.1 Training of staff
Records on training of OVS assistants and plant staff (lymphnode removal) were available.

II.6.2.2 Official controls
Identity checks in the lairage and the pre-slaughter DBES eligibility checks are performed by the OVS. At this slaughterhouse, 14 animals had been rejected for various reasons (animal was never DBES checked before, animal and passport did not fit together etc.). All stages of slaughter, dressing, storage, handling and despatch are under official MHS supervision. Permanent supervision of the ante mortem and post mortem inspection by OVS is given. The OVS performs reconciliation exercises using data supplied by the company. The co-operation between MHS staff and slaughterhouse staff seems to be good.

In case an ineligible animal was slaughtered the OVS declared that he would detain also the following carcass as well. If the ineligible carcass was already in the chill he would eventually detain more carcasses if necessary.

II.6.2.3 Slaughter process
Due to the clear designation of tasks the slaughter process seems transparent and a clear assignment of carcasses, skulls and offal seems to be guaranteed.

To maintain the identity of the carcasses after de-hiding 2 temporary tags (containing ear tag number, kill number and kill date) are attached to every side of the carcasses and to the red offal. If an animal has to be detained a detention tag is produced and the carcass is removed from the slaughter line. After grading 3 luggage labels are attached to each sides forequarter, flank and hindquarter.

II.6.2.4 Chill
In the chill carcass halves and wholesale cuts (forequarters, hindquarters or flanks) are stored. The cutting plant is exclusively supplied with wholesale cuts from this chill. The chill is lockable and was declared to be sealed if MHS staff is not present on the premises.

II.6.2.5 Cutting plant
If an order has to be build up, the butchery manager determines which and how many wholesale cuts have to be processed during the boning day. The wholesale cuts processed during one boning day may come from different slaughter days (kill dates). Before the wholesale cut enters the cutting plant different primary labels are printed and attached to the wholesale cut. These labels indicate which single cut is foreseen for export and gives information on: name of the cut, ID number of the animal, batch number and a bare code label. The label follows the cut and enters even the packaging.
Labelling of boxes destined for export takes place after all boxes for domestic market have been labelled. By this it is achieved that boxes for export consignments contain successive numbers for the health marks and additional marks. The health and/or additional marks are applied on the boxes in a way, which makes it impossible to open a box without destroying at least one of the marks.

Boxed meat is stored in a chill, which is sealed if no MHS staff is on the premises.

Trucks transporting DBES meat for export are not sealed as such, but the consignments in the trucks are sealed in “cages”. A cage consists of boxes piled up on a pallet, which is wrapped with foil and secured with plastic strips. Seals are applied in a way as to avoid any removal or addition or replacement of boxes.

II.6.2.6 Traceability

The company is running a database to keep the traceability of meat from the farm to the final packaging in the cutting plant since a long time. In fact the animals ID is shown on every piece of packaging leaving the cutting plant.

Several forward and backward tracing exercises were performed either using animal ID numbers or serial numbers present on the health mark label during the visit. With the help of the OVS and plant staff it was possible to trace in either way without difficulties.

II.6.2.7 Certification

Once an export consignment is build up, the 
**exporter**
applies by fax to the AHDO to issue a Health Certificate giving the relevant information (consignor, consignee etc.). The AHDO in turn issues the certificate on water marked paper giving a unique health certificate number and sends it back by mail to the OVS. A number of support documents, including an ANIMO trigger document, are also included. The OVS completes the certificate with the necessary information and gives it to the exporter who in turn passes it to the truck driver to accompany the consignment. A copy of the certificate is send to the AHDO by fax and a certified copy by mail. After signing the certificate the OVS sends a completed ANIMO trigger document to the AHDO by fax asking for an ANIMO message to be send to the veterinary services of destination. As most consignments are send in the end of the week, the ANIMO messages are normally send on morning of the following Monday. Consignments sent to MS neighbouring UK will most probably have already arrived in the MS of destination before the ANIMO message is send to announce the consignment.

Since March 2000 copies of ANIMO messages sent by AHDOs are returned to the OVS who filled in the trigger document to enable him/her to check for accuracy.

II.6.3 DBES unit of MAFF

During a visit to the DBES unit the recall provisions were discussed again. In order to guarantee that cattle slaughtered under the DBES are eligible at the time of slaughter in respect of cattle identification and dam survival, the DBES unit produces a post-slaughter cattle identification report every day according to the procedures laid down in Chapter 22 U. It includes all animals, which have been slaughtered at a DBES plant in the 14 past days and will highlight these animals for which DBES critical discrepancies have been found during a CII (these animals would be flagged in the CPS/CTS database) since the day of slaughter. This report is the result of an active search by the DBES database for flagged animals in the CPS/CTS database. The need
to undertake post slaughter checks against the results of CII up to 14 days after slaughter reflects the maximum time delays that can occur in placing results on the CPS/CTS database. It also ensures that the outcome of an CII carried out up to the time an animal is being slaughtered is taken into account in determining its eligibility for DBES.

If during these 14 days an animal being slaughtered under the DBES is found to have been ineligible at the time of slaughter the GB authorities would organise a recall of products from that animal.

The GB authorities interpret Annex III, point 4 to Council decision 98/256/EC that cattle slaughtered under the DBES have to be eligible at the time of slaughter.

If the DBES unit comes across problems with regard to animal identification during DBES eligibility checks, this is explained in a letter, which is sent to the farmer detailing the results of eligibility checks on his/her animals. BCMS are also sent a copy of the letter and are thereby made aware that the farmer needs to take corrective action within regard to the records for these animals held on the CTS.
III. Conclusions

III.1 Bovine Spongiform Encephalopathy

- High awareness and knowledge of typical signs is not only the result of high incidence but also of active and frequent measures by Ministry of Agriculture, Fisheries and Food. Great Britain can be considered as complying with article 1 of Commission Decision 98/272/EC.

- A fair compensation system seems to encourage farmers to notify suspect cases. Furthermore, the current eradication measures only affect the suspect case. Therefore, under-reporting by farmers or practitioners can be considered minimal and unintentional if it occurs. Great Britain can be considered as complying with article 2(1) of Commission Decision 98/272/EC.

- Particularly farmers and also practitioners to some extent notify atypical cases to Animal Health Divisional Offices. The provisions of articles 2 and 3 of Commission Decision 98/272/EC are complied with as regards movement restrictions, clinical investigations and ruling out of BSE.

- It is probable that some atypical cases are excluded from sampling. As long as the Over Thirty Months Scheme is operational, such cases will not enter food or feed chain and do not pose any health risk.

- The sub-populations defined in Annex A 1 “of native born animals displaying clinical signs compatible with TSEs” have been sampled throughout the epidemic. However, this sampling has occurred as a ‘by-product’ of official notifications. As the total number of suspects is decreasing each year, also the number of samples from these sub-populations is decreasing.

- Of the sub-populations defined in Annex A 2 “higher risk animals” only the “animals which have consumed potentially contaminated feedingstuffs” can be regarded as being included in the sampling activities by the OTMS survey. Animals originating from countries with indigenous BSE do not have to be sampled in the United Kingdom. The sub-population “animals born or derived from TSE infected dams (=offspring)” have not been included in the monitoring activities so far although they have to be traced and destroyed if born after 1 August 1996. The Great Britain authorities justify this with the fact that these animals are relatively young and the probability to find a BSE positive animal in this sub-population seems to be low.

- Apparently the ‘cost-benefit ratio’ of sampling the different sub-populations varies significantly and the number of animals, particularly in the groups of offspring and potentially exposed animals is large. Therefore, the approach chosen by Great Britain authorities to further target the sampling of these sub-populations seems reasonable and well justified.

- The number of annual examinations is above the minimum number laid down in Annex A of Commission Decision 98/272/EC. As even the number of non-confirmed suspects exceed the minimum requirement it can be concluded that Great Britain complies with the Decision as regards the volume of monitoring.

- However, as the incidence declines further, passive monitoring will not be sufficient in terms of neither quantity nor targeting.
III.2 Animal identification and Date Based Export Scheme

- The mission team found that Commission Regulation (EC) No 494/98 is still not fully enforced in Great Britain. This means in practical terms that cattle for which no discrepancies were found but were kept in a holding with more than 20% discrepant cattle can enter the Date Based Export Scheme because a legal basis to restrict these animals is not existing.

- Consequently the corresponding measures (sanctions) are not included in the manual ("Instructions for Field Officers") for the field officers carrying out the cattle identification inspections.

- The arrangements seen in the Date Based Export Scheme premises were transparent and easy to follow. The traceability system is satisfactory.

- The certification process seems to be quite laborious and heavy.

- ANIMO messages to announce Date Based Export Scheme meat consignments were sometimes sent late and for some cases it can be assumed that they will have arrived later than the consignments.
VI. Recommendations

VI.1 Recommendations to the Great Britain authorities

Unless another deadline is indicated, the Great Britain authorities are required to inform the Commission Services of the action taken or planned to address the following recommendations within 25 working days, including deadlines for completion of these actions where appropriate, after receiving the final report.

IV.1.1 Bovine Spongiform Encephalopathy

- The Great Britain authorities should implement more active epidemiological surveillance to ensure that the level of monitoring remains at an acceptable level even after the incidence has further decreased. To achieve this, the Great Britain authorities should consider sampling of animals entering slaughterhouses, incinerators and knackeries, in particular where the necessary infrastructure for sampling already exists.

- The Great Britain authorities should consider a mechanism to follow-up notified cases with negative reports and cases with restrictions lifted. If such animals subsequently died or were destroyed, they should be sampled in the framework of a monitoring program.

- The Great Britain authorities should include in the future also offspring of infected dams (at least the oldest offspring born after 1 August 1996) in their monitoring activities.

IV.1.2 Animal identification and Date Based Export Scheme

- The Great Britain authorities are again asked to fully enforce Commission Regulation (EC) No 494/98 in order to avoid that any cattle from holdings with more than 20% discrepant cattle can enter the Date Based Export Scheme.

- The Great Britain authorities should guarantee that ANIMO messages pre-notify Date Based Export Scheme consignments.

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3 GB authorities acknowledged in their comments on the draft report that they will need to undertake pro-active surveillance in the future. They informed that a further survey of OTMS cattle has commenced already.

4 GB authorities informed in their comments on the draft report that they will consider whether it is possible to include such cases within the required monitoring activities as laid down in CD 98/272/EC (as amended).

5 GB authorities stated in their comments on the draft report that if maternal transmission exists, the animal most at risk will be the last born offspring to a BSE case and not the oldest offspring born after 1 August 1996 and that no reliable test is available which can identify animals affected with BSE at an early stage in infection.

6 GB authorities re-affirm their commitment to enhance its implementation of Commission Regulation (EC) No 494/98. Detailed procedures for CII inspectors and the BCMS on the imposition of administrative sanctions are being prepared at the moment. They hope to introduce these during September 2000.

7 GB authorities informed in their comments on the draft report that in case an ANIMO message cannot be sent on the day the export health certificate is signed, the certifying OVS/LVI will fax a copy of the completed ANIMO trigger document to the headquarters of the competent veterinary authority of destination. If this has to be done for an export certificate to another member state the electronic ANIMO message will be sent to the local veterinary unit of destination on the next working day.
Great Britain Competent Authority response to the recommendations in the report

1. On the recommendation to implement a more active epidemi-surveillance, the authorities acknowledge that it will need to undertake pro-active surveillance in the future. A further survey of OTMS cattle has already commenced.

2. On the recommendation to establish a follow-up for notified cases with negative reports and cases with restrictions lifted, the authorities will consider whether it is possible to include such cases within the monitoring programme we are required to implement under Commission Decision 98/272 (as amended).

3. On the recommendation to include in the future also offspring of infected dams (at least the oldest offspring born after 1 August 1996) in their monitoring activities, the authorities point out that if maternal transmission exists, the animals most at risk will be the last born offspring to a BSE case. These will not be the oldest offspring born after 1 August 1996; they will be the youngest. In addition, as there are no validated tests available, which can reliably identify animals affected with BSE at an early stage in infection this detracts from the value of including such offspring in monitoring activities.

4. On the recommendation to fully enforce Commission Regulation (EC) No 494/98, the authorities re-affirm its commitment to enhance its implementation of Commission Regulation (EC) No 494/98. Detailed procedures for Field Staff and the BCMS on the imposition of administrative sanctions are nearing completion and copies of these draft instructions will be submitted to the FVO when they are available. They announced to introduce the implementation during September 2000.

5. On the recommendation to guarantee that ANIMO messages pre-notify DBES consignments, the authorities announced the following procedure: If ANIMO messages for consignments of DBES goods cannot be sent on the day the export health certificate is signed, the certifying OVS/LVI will be asked to fax a copy of the completed ANIMO trigger document to the headquarters of the competent veterinary authority of destination. The OVS/LVI will be asked to liaise with the AHDO in such cases. In the case of exports to other EU Member States, an electronic ANIMO message will be sent to the Local Veterinary Unit of destination on the next working day.