

Opinion of the
Scientific Steering Committee
on the
GEOGRAPHICAL RISK OF
BOVINE SPONGIFORM
ENCEPHALOPATHY (GBR) in
INDIA

Adopted on 30/03/2001

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THE QUESTION

The Scientific Steering Committee (SSC) was asked by the Commission to express its scientific opinion on the Geographical BSE-Risk (GBR), i.e. the likelihood of the presence of one or more cattle being infected with BSE, pre-clinically as well as clinically, at a given point in time, in a number of Third Countries.

This opinion addresses the GBR of India.

THE BACKGROUND

In December 1997 the SSC expressed its first opinion on Specified Risk Materials where it stated, inter alia, that the list of SRM could probably be modulated in the light of the species, the age and the geographical origin of the animals in question.

In June 2000 the European Commission adopted a Decision on SRM (2000/418/EC), prohibiting the import of SRM from all Third Countries that have not been "satisfactorily" assessed with regard to their BSE-Risk.

In July 2000 the SSC adopted its final opinion on "the Geographical Risk of Bovine Spongiform Encephalopathy (GBR)". It described a method and a process for the assessment of the GBR and summarised the outcome of its application to 23 countries. Detailed reports on the GBR-assessment were published on the Internet for each of these countries.

In September 2000 the Commission invited 46 Third Countries, which are authorised to export products to the EU that are listed in annex II to the above mentioned SRM-Decision, to provide a dossier for the assessment of their GBR.

Until today 36 dossiers have been received, 6 are already assessed, and 30 are in different state of assessment.

This opinion concerns only one country, India. The Commission requested this opinion as essential input into its Decision concerning the treatment of SRM that will be requested from India in order to ensure that exports to the European Union are as safe as similar products within the EU. It is recommended that this opinion on the GBR of India be read in the light of the SSC's GBR-opinion of July 2000.

The SSC is concerned that the available information was not confirmed by inspection missions as they are performed by the FVO in the Member States. It recommends that BSE-related aspects are included in the program of future inspection missions, as far as feasible.

THE ANALYSIS

According to Eurostat live cattle as well as MBM was exported from BSE-affected countries, in particular DE and DK, to India. Only parts of the cattle exports are registered as imports in the Indian statistics. However, it cannot be excluded that the BSE agent did reach India by these routes.

In terms of the GBR assessment India was therefore potentially exposed to a **low external challenge** during 1980-1987, a **very low** one between 1988-1990, a **low** one in 1991-1992, a **very low** one in 1993 and a **negligible** one since 1994.

The BSE/cattle system in India is assessed as **very unstable**. It cannot be excluded that cattle have accidentally access to processed ruminant proteins, mainly the by-products from the rural rendering plants. These plants operate at atmospheric pressure and the applied processes could not reduce BSE-infectivity, should it be present. The modern rendering industry that was established in the 90s, operates at $133^{\circ}\text{C}/20^{\text{min}}/3^{\text{bar}}$ but no data on controls were made available. Until 1999 SRM were rendered in both systems but it is not clear how the 1999-SRM ban is implemented and controlled. Notification of BSE is compulsory only since 1998 and surveillance is only passive. Feed controls are apparently carried out in feed-mills but the methods, frequency and results are unclear. Nevertheless, due to segregation of cattle feed and poultry feed production, cross-contamination of cattle feed with MBM is unlikely but it cannot be fully excluded.

Given that the BSE-agent could have reached the Indian BSE/cattle system via MBM and cattle imports from BSE affected countries in the early 90s, and the Indian system is assessed as very unstable, it is possible that BSE is present in India.

It is therefore concluded that it is unlikely, but cannot be excluded, that one or several cattle that are (pre-clinically or clinically) infected with the BSE agent are currently present in the domestic herd of India (**GBR-II**).

A summary of the reasons for the current assessment is given in annex 1 to this opinion.

A detailed report on the assessment of the GBR of India is published separately on the Internet. It was produced by the GBR-task force of the SSC-secretariat and peer reviewed by the GBR-Peer group. The country had two opportunities to comment on different drafts of the report before the SSC took both, the report and the comments, into account for producing this opinion. The SSC appreciates the good co-operation of the country's authorities.

India – Summary of the GBR-Assessment, March 2001							
	EXTERNAL CHALLENGE		STABILITY				INTERACTION of EXTERNAL CHALLENGE and STABILITY
	1980-87: Low; 1988-90: Very low; 1991-92: Low, 93: Very Low; 94-99: Negligible.		1980-99: Very Unstable.				
GBR-Level	Live Cattle imports	MBM imports	Feeding	Rendering	SRM-removal	Surveillance, cross-contamination	
II	<p>Only one animal imported from UK.</p> <p>Other BSE-affected countries:</p> <ul style="list-style-type: none"> • 80-87: 928 from DE, 12 from NL, 565 from DK. • 88-93: 566 from DE, 110 from DK. • 94-99: 31 from DE and 309 from DK. <p>Source: Eurostat</p>	<p>No imports from UK.</p> <p>Other BSE affected countries:</p> <ul style="list-style-type: none"> ▪ before 91 : 7t from SP ▪ 91-93: 145 t from FR and BE. ▪ 95/96: 33t from FR, NL. <p>Only the exports from FR in 91-93 confirmed by exporting country, other exporting countries could not trace back their exports. No records in Indian import statistics. Possible explanation: transit.</p>	<p>Reasonably OK</p> <ul style="list-style-type: none"> • No (R) MBM feed ban but MBM not included in official composition for cattle feed. • Voluntary feeding unlikely for several reasons. • Feed controls but no evidence of any checks, hence accidental feeding not excluded. • Accidental access of cattle to residues/by-products of rural rendering seems possible. 	<p>Not OK</p> <ul style="list-style-type: none"> ▪ Modern rendering according to EU-standard but no controls. ▪ Rural rendering at atmospheric pressure. Therefore not adequate to reduce BSE infectivity. 	<p>Not OK</p> <p>SRM rendered.</p> <p>SRM ban since 1999, but no information on implementation and controls, particularly as regards to the rural rendering plants.</p>	<p>BSE-Surveillance: Notification of BSE since 1998. Only passive surveillance. Insufficient.</p> <p>Cross-contamination: Cross-contamination of cattle feed with MBM not likely.</p>	<p>The very unstable Indian BSE/cattle system was probably exposed to small, but not negligible external challenges, mainly from cattle imported in the late 80s. If any of these potentially infected cattle ended-up in rendering, i.e. until 1993/94 in rural rendering as the modern rendering did not exist, the BSE agent could have reached domestic cattle. If this happened, some cattle were infected in the mid 90s and could still be alive. The risk posed by the MBM imports is regarded to be small, but also not negligible. It seems, however, unlikely that imported MBM, if existing in the country, could have reached domestic cattle.</p> <p>Given the instability of the system, BSE-infectivity that is already in the country could be recycled and amplified, leading over time to an increasing GBR.</p>
GBR-trend	Only parts of these exports also recorded in the Indian import statistics.						INTERNAL CHALLENGE
							An internal challenge cannot be excluded to have occurred in the mid 90s, when imported, potentially infected cattle could have been rendered. It would still exist.