

PROPOSAL TO REVIEW PROHIBITIONS
CONCERNING ANIMAL FEEDING OF
PROCESSED ANIMAL PROTEINS (PAPS)
DERIVED FROM NON-RUMINANT
ANIMALS – BEUC COMMENTS

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Past crisis such as the BSE outbreak in the 1990's have lowered consumer confidence in food safety. In the case of BSE, epidemiologial studies suggest that the source of the disease was cattle feed prepared from animal tissues (brain, spinal cord etc) which was contaminated by the BSE agent. It is widely recognised that the feed ban which consists of a ban on the use of animal proteins in feed for farmed animals has been the key animal health protection measure against the spread of TSEs.

We are aware of the proposal to ease restrictions concerning the use of processed animal proteins (PAP) derived from non-ruminants in the feed chain. We would urge caution on this as the feed ban is a crucial measure in terms of the spread of BSE. In the EFSA opinion on the revision of the quantitative risk assessment (QRA) of the BSE risk posed by processed animal proteins (PAPs) published earlier this year<sup>1</sup>, the BIOHAZ panel highlighted a number of knowledge gaps which we believe should be addressed prior to any relaxation of the feed ban.

The EFSA Panel has assessed the cattle BSE risk posed by bovine derived PAPs in feed. Although they estimate the risk as meaning that less than one additional BSE infected cow could be expected in the EU cattle population per year with an upper 95% confidence. However, they make it clear that this assumes other measures such as SRM controls and monitoring are carried out effectively. It was also highlighted by the BIOHAZ panel that, considering the many uncertainties related to atypical BSE (prevalence, tissue distribution of the infectious agent, efficacy of rendering process for agent inactivation), the risk of atypical BSE transmission through PAPs cannot be assessed but should not be disregarded. It was recommended to continue the development of analytical methods to improve the limit of detection of animal proteins in feed and to take into account the risk of (re-)emergence of TSE in cattle in case the use of some mammalian PAPs for feeding animals should be reintroduced. Additionally, in case of modification of the mitigation measures against BSE, they advise that the assessment should be updated.

It is important to note that all of the EFSA biohazard panel opinions emphasise the potential risk of atypical BSE. It is clear that more emphasis should be placed on this issue both at Member State and EU level. BEUC calls for further work to be undertaken to collect specific data related to the PAP production and distribution system and expand specific knowledge related to Atypical BSE (in particular as regards to prevalence, pathogenesis in natural host, capacity to propagate in other animal species and resistance to inactivation processes applied in rendering plants). It is also important to bear in mind any potential for inadvertent cross-contamination of different sources feed. This contributed to the spread of BSE and reinforces the need for a comprehensive and precautionary approach to any review of the ban. It is essential that the supply chain is risk free prior to the lifting of any controls.

End

<sup>&</sup>lt;sup>1</sup> http://www.efsa.europa.eu/en/efsajournal/pub/1947.htm