

Report of the Secretary's Advisory Committee on Foreign Animal and Poultry Diseases

Measures Relating to Bovine Spongiform Encephalopathy in the United States

February 13, 2004

Introduction

The Secretary's Advisory Committee on Foreign Animal and Poultry Diseases (hereafter referred to as the Committee) wishes to thank the members of the International Review Subcommittee (hereafter referred to as the Subcommittee) for their Report on Measures Relating to Bovine Spongiform Encephalopathy in the United States (hereafter referred to as the Report).

The Committee wishes to recognize the outstanding effort put forth by Secretary Ann Veneman and her staff at USDA following the discovery of bovine spongiform encephalopathy (BSE) in a cow in the state of Washington. Her leadership and transparent communication with the public, media and stakeholders were directly responsible for maintaining public confidence in the actions taken and in the safety of the food supply. This direct communication was extremely beneficial to prevent unnecessary interstate movement restrictions. She continually emphasized that actions, policies and regulations were based on the best available science to protect both public health and animal health.

Specific recognition is given to Dr. Ron DeHaven, Chief Veterinary Officer for the US for his tireless commitment to the investigation and his excellent communication skills in providing regular updates on the situation. In addition, the Committee wishes to recognize and thank all of the management and field staff at USDA, the State of Washington, and all other state and federal agencies that worked around the clock to complete this investigation.

Recognition of Positive Findings by the Subcommittee

The Committee wishes to recognize the many positive findings stated in the briefing by the Subcommittee representatives and further documented in the Report, including:

- The openness, full disclosure and access to personnel provided by USDA;
- Commending the Secretary on the open manner in which the investigation was conducted and for making their findings immediately available to the public;
- The epidemiological investigation as to the origin of the index case conformed to international standards, even though the trace was hindered due to the lack of a national animal identification system;

- The ability of USDA personnel to work cooperatively with their Canadian counterparts when it became obvious there was an epidemiological connection; this demonstrated a long-standing, close working relationship between countries;
- Tracing and recall of the rendered meat and bone meal possibly made from the positive cow was effective and appropriate;
- The U.S. ban on specified risk materials from cattle over 30 months of age removes the highest risk tissues from the human food supply and is in accordance with international standard;
- Prohibition of air injection stunning of cattle was appropriate to prevent cross-contamination of the carcass;
- Recognizing the merits of the ban prohibiting non-ambulatory cattle from entering the food supply, but also noted the unintended consequences of making it more difficult for surveillance of this high risk group;
- Agreement by the Subcommittee that testing of all cattle slaughtered for human consumption is unjustified in terms of protecting human and animal health.

Concerns Regarding Differing Opinions on Risk

The Subcommittee made many additional recommendations. However, the Committee cannot adequately resolve the differing BSE risk assessment presented by the Subcommittee as compared to the assessment by Harvard University. A major discrepancy exists with the Subcommittee's conclusions that BSE continues to circulate, or even amplify, in the US and North America, when compared with the Harvard risk assessment. The Committee must have this issue of risk resolved prior to completing its recommendations to the Secretary. **It is imperative that the Secretary has the best available science and more precise risk assessments in order to make appropriate regulatory decisions.**

Recommendations by the Committee

- Prior to implementing regulatory changes in addition to what USDA and FDA have already announced, **the Committee recommends that representatives of Harvard University be asked to review the Subcommittee Report and its findings (Harvard and the Subcommittee should communicate directly and come to consensus if possible) in light of the risk model they have previously developed and report back to the Secretary and this Committee;**
- Immediately develop and implement an enhanced national surveillance program for BSE to increase testing of high risk animals (cattle showing symptoms of central nervous system disease, non-ambulatory cattle, and cattle that die on farms); this action will further the scientific evaluation of risk for BSE in the U.S. and North America;
- Concurrent with an enhanced surveillance for BSE, a comprehensive system must be implemented to facilitate adequate pathways for dead and non-ambulatory cattle to allow for collection of samples, and for proper, safe disposal of carcasses; this must be done to ensure protection of public health, animal health

- and the environment; such as system will require expending federal resources to assist with costs for sampling, transport and safe disposal;
- Supports the Secretary's announcement to move quickly to implement a verifiable national animal identification and tracking system as envisioned by the United States Animal Identification Plan (USAIP) that has been endorsed by the United States Animal Health Association; however, provisions must be taken to allow for incorporation of new technologies as they become available;
 - Enhance development of the National Laboratory Network, specifically to approve additional regional laboratories to conduct rapid screening tests for BSE, but maintain confirmatory testing with the National Veterinary Services Laboratory; there will be a need to provide more rapid results to packers, renderers and others for testing and release of carcasses in the food, rendering and disposal systems;
 - Enhance development and dissemination of BSE information to the media, public and all industry stakeholders to ensure that everyone understands the mechanisms of BSE transmission (not contagious) and safeguards necessary for its control;
 - Encourages major beef exporting nations to work through the OIE to rationalize trading protocols that apply to countries with a low number of BSE cases which have adequate safeguards in place.

Conclusion

The Committee again wants to commend the Secretary and all of her staff at USDA and officials in the State of Washington and FDA for their efforts and swift action to address the first case of BSE in the U.S. **It is imperative that all future decisions be based on the best available science and that all necessary steps be taken to protect the safety of the public as well as the economic viability of animal agriculture in the United States.**