

PAPER 03/07/02

**OTM RULE REVIEW: CORE STAKEHOLDER GROUP REPORT  
CONSULTATION RESPONSES**

Overview and general comments

Company/Organisation	Which Option?	Why and General Comments
Association of Independent Meat Suppliers (AIMS)	Oct 98 as an interim	As a basis for addressing concerns raised in consultation process but only for one year while those concerns are addressed.
British Institute of Agricultural Consultants (BIAC)	All Cattle	Aug 96 invites arguments about food safety and raises complications about verification of age. Believe market will take time to adjust. Important to recognise market pressures & effect of CAP reform if headage payments removed wef 01.01.04 though no reason to affect decision on OTM rule. Strongly oppose EU buying-in scheme to manage short-term disruption Recommend seek re-classification of UK to moderate BSE status; allow market to adjust to new situation and close monitoring of market to provide information to farmers who can manage their own marketing.
British Leather Confederation (BLC)	Prefer gradual approach: 01.10.98	Would allow reduced number of cattle back into food supply, reduce consumer reaction, market disruption and assist transition in putting less strain on new tests and procedures. Main concern that no action taken which might destabilise consumer confidence in the market and supply of raw material (cattle hides). Concern about logistics of allowing 15-60% or 100% OTM cattle back onto market without phasing after 7 year gap and impact on consumer confidence: justification risk assessment and cost but risk assessment difficult for non-specialist to evaluate so not strong basis for promoting consumer confidence.
British Meat Federation (BMF)	August 96	Consumer confidence - seek positive steer from FSA & politicians. Do not want to see "BSE tested" labelling. Must be coupled with market support. Expect majority of plants would want to be able to slaughter OTM if market justifies it. Do not support "gradual" reintroduction.
British Meat Manufacturers Association (BMMA)	Phased - starting with 01.01.00	Phased approach would allow confidence in testing procedures to build on sure foundations, help market to adjust with limited impact on prices and retain consumer confidence. Welcomes conclusion that move away from OTM rule unlikely to increase the risk of an additional vCJD death. Utmost importance that consumer confidence not lost as result of change: communication vitally important. FSA role to ensure procedures in place to provide food safety assurance and risk communication key responsibility but urge FSA to recognise potential impact of over supply and collapse in market prices on consumer confidence. There may be benefits to manufactures in cost terms but consumer confidence would be unsustainable if retail sector did not source OTM beef. Export restrictions must be lifted to help market stabilise and provide message to consumers.
British Medical Association	xxxxx	No comments

General

British Retail Consortium (BRC)	01.01.00 followed by 01.10.98	Traceability, testing capacity, market demand, consumer confidence. FSA has pivotal role in communication strategy to maintain consumer confidence. All cattle option not viable - cohort cull.
British Veterinary Association, Scottish Branch (BVAS)	August 96	Agree risk disproportionate to cost. All cattle option could affect confidence; potential welfare problems & place burden on labs. Concerned total or rapid removal of the rule could result in dramatic fall in value of animal which could compromise an already cash strapped industry; serious animal welfare and possibly animal health implications - FSA and Defra should consider side-effects of finalising OTMS. Must be discussion with agriculture industry and BVA to make transition as smooth as possible.
Comhairle nan Eilean Siar	All Cattle	Testing would prevent infected carcass entering food supply; enforcement difficulties associated with other option. Welcome review as changes will benefit crofters by allowing OTM into food supply and less wasteful than at present. Slow to mature Highland cattle particularly suited to climate and grazing. Extra costs could lead to increase in illegal kills and fewer crofters prepared to be involved in cattle - reduction in demand could make things more difficult re slaughter facilities. Advocate gradual changeover to prevent rapid reduction in price of stock. Important issues for crofters to be addressed - costs, storage etc
Consumers Association (CA)	No Change	Number of outstanding questions which need to be addressed before could support change: extent to which epidemic declining; reason for cases born after 01.08.96; reliability of cattle id. Greater transparency about the risk assessment and assumptions are required. Number of detailed questions raised about the risk assessment. Agree consumer confidence important. Reason for change in control measures should be clearly communicated so consumers can make informed decisions. Query appropriateness of phrase "sound science". If date of birth option chosen, there should be an initial pilot study, followed by phased introduction.
Crofters Commission (CC)	Phased/Aug 96	Favour phased removal so that market can absorb expected increase in animals. Occasional BSE case in cattle born before Aug 96 justifies retention of OTM scheme for stock born before Aug 96.
Defra	August 1996 from Jan 04 - with review early 2005 if all cattle option preferred and cohort cull complete if embarked upon.	Practical consideration of cohort cull needs to be taken into account which will fall to Defra - no difficulty re August 1996 but pre-August 1996 would be a massive task which would take one or two years to complete. Supports January 2004 as date for change in rule. Congratulates FSA on thorough and open way in which review has been carried out.
Edinburgh City Council	xxxxx	Request for information about testing
EM Consultants	Neither: Phased - based on date of birth	To allow an ordered and safe development of the market. Market management. Collapse in market would lead to animal welfare problems and damage confidence if fringe operators do not comply with testing etc

## General

English Beef & Lamb Executive (EBLEX)	Supports MLC response	Concern nothing jeopardises consumer confidence. OTM rule change should not be done in isolation to DBES change.
European Commission, Health & Consumer Protection Directorate-General	xxxxx	Asked to be kept informed of developments arising from the consultation.
Faculty of Veterinary Medicine, Glasgow University	All Cattle	Simplest and cheapest option would prevent confusion. Reduced need for birth date and dentition checks and reduce chance of fraud.
Family Farmers Association (FFA)	August 96	All cattle option would cause severe disruption at abattoirs, testing service and market. Phasing may be necessary to avoid too much OTM coming onto market in very short period. Vitally important to retain consumer confidence.
Farmers For Action (FfA)	Neither: Phased increase in age limit	Market impact. Fear another vCJD death if OTMS scrapped and media would destroy the UK beef industry forever. Hope FSA will take great care when take decision not to scare public in respect of this terrible disease which would destroy the UK beef industry.
Farmers Union of Wales (FUW)	Phased - starting with 01.01.00	Over supply and implications for consumer confidence. Export restrictions must be lifted before change introduced. Market support needed (purchase for destruction scheme) if phased approach not accepted. Consumer confidence paramount: phased approach represents prudent way forward.
Foodaware: the Consumers' Food Group (F-CSG)	No change	Uncertainties remain about TSEs. There is a need for greater transparency over the risk assessment. Rule should not be replaced unless and until testing is certain to work as effectively [as the rule]. Testing regime should be demonstrated to be effective, reliable and transparently audited before considered as a replacement. Research into consumer response to change in controls is needed.
Food Commission (FC)	No Change	Believe consumer organisations need considerable assistance to understand how modelling has been applied eg basis for number of id 50s entering food supply. Queries validity of revised 2003 vCJD forecast published by Imperial in BiMed. Concern that if +ve appendix not Met-Met genotype, forecasts should be much larger making it difficult to change the rule now. If incubation period 50 years, current cases may be due to infections in the mid 1970s. Degree of error in previous BSE model predictions would have serious implications for vCJD forecasts. Use of modelling in policy making needs careful handling - unfortunate if disputes which arose over FMD modelling after policy affecting public health were fixed. Reluctant to accept modelling without more open scientific debate: recommends open scientific debate to determine robustness of vCJD forecasting and effects on removing OTMS. Should be 3 month dry run of testing before implementation.

General Consumer Council, Northern Ireland (GCCNI)	Supports change	Public health should take precedence over cost:benefit analysis. Decisions must be communicated to consumers in way which maintains consumer confidence.
Grazing Animals Project (GAP)	August 96	Bring into line with EU. Conservation advantages. Market advantage to tested, grass-reared prime beef. Hope that relaxation of OTM rule will improve situation as regards local sourcing of environmentally friendly meat.
Health and Safety Executive (HSE)		Not in a position to comment on whether OTMS should continue. Interest lies in health & safety of employees involved.
Human BSE Foundation (HBSEF)	No Change	Cannot accept any change which might increase vCJD risk. Pleased to attend meetings in capacity as an observer.
International Meat Trade Association Inc	All Cattle	To be on same footing as other member states
JM<wisebarin@yahoo.co.uk>	All Cattle	Advantages reference cattle identification. Advocates OVS should take samples, rather than trained industry operatives.
Livestock and Meat Commission for NI (LMC)	August 96	If selection criteria based on market confidence. Fully supportive of conclusions. Will seek to participate in Defra-led discussions on effect of change on the market. Highlight critical importance of ensuring open and transparent communication to the market place and to consumers to ensure high level of confidence in UK beef is sustained.
Meat and Livestock Commission (MLC)	01.10.98	Consumer confidence important - will monitor consumer opinions over next few months. Plan to provide briefing to industry to complement FSA activity. Consumption 901k tonnes in 1995, 985k tonnes in 2002.
MRC Biostatistics Unit, Cambridge University	xxxxx	Unacceptable to base decisions on uncheckable data. Any change should be reversible if OTM testing suggests estimates of risk on which policy is based were wrong.
National Beef Association (NBA)	All Cattle	Disruption to the beef market could be interpreted as evidence that consumers have rejected older beef on safety grounds and undermine credibility of beef. Unequivocal FSA endorsement essential - early indications that consumers ready to accept older beef. Believe market safety net need only be temporary to assist maintaining consumer confidence.
National Blood Service	xxxxx	No comments

Public health concerns should remain paramount and highly precautionary approach continues to be warranted. Before changes are made would wish to be assured that arrangements, including testing, would offer no less significant consumer protection. Vital to maintain public trust and confidence in measures to protect public health: questions over competence of introduction likely to have negative impact on consumer confidence and ultimately Agency credibility. Recommend FSA undertake research to gauge how changes would be perceived. NCC research shows BSE remains high in list of consumer concerns. Given controls in place to protect consumers find FSA 2002 Consumer Attitudes Survey indicative of need to consider extremely carefully management of changes to existing regime and potential impact on consumer risk perceptions.

National Consumer Council (NCC) & Scottish Consumer Council	Before changes are made would wish to be assured that arrangements would offer no less significant consumer protection.	Impact on beef market may have indirect effect on consumers and their confidence would need to be considered by FSA - may be felt to be more significant to those who eat meat products (pies, sausages, burgers etc) ie poorer and younger consumers. Significant quantities of older beef coming onto market could lead to collapse in prices. While many consumers may welcome cheaper meat, this could impact on risk perceptions. May ask if cheaper meat is also lower quality and hence raise questions about safety. Recommend consideration be given to managing how changes will impact on the market including communication to consumers.
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National Council of Women of Great Britain (NCW) No Change	Too many questions remain. Accept change could lead to stronger meat industry; prevent the slaughter of healthy animals; allow cheaper cuts of meat to be sold in the UK and lead to reduction of imports. Raise a number of concerns particularly about testing, enforcement, the market and resources. Conclude it would be disastrous if new information were to erode public confidence. Need for rapid diagnosis, particularly BSE apparent and ask if sufficient resources are being applied in this area. Short term major expense could result in long term savings.
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Enhanced consumer confidence and safety. Follows start of BCMS operations which established computerised records: consultation refers to need for effective cattle tracing. Indications that this would be preferred by the multiple retailers. Pleased to have been represented on the Group. FSA's approach has been thorough and considered. Vital change implemented in equally thorough and considered way. Findings highlight continuing rapid decline in BSE and testify to effectiveness of controls. This positive message should be conveyed to British consumers.

National Farmers Union (NFU)	Oct 98	Recommend pilot before full implementation to maintain consumer confidence, test operational procedures and reduce market disruption. Vital FSA communicates clearly, carefully and effectively to maintain consumer confidence in beef regardless of its age. Critical entire food chain works together to ensure consistent, unambiguous message. Concerned about market impact - any change must be accompanied by appropriate changes to DBES. Insist on retention of OTM Scheme for cattle born before relevant date. Want to be satisfied that cohorts can be properly traced and about compensation terms.
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NFU Scotland (NFUS)	01.01.00 pilot followed by 01.10.98	<p>Impact of significant volumes of OTM beef is an issue for FSA as this has potential to undermine consumer confidence: consumers reject meat and meat products which, because of market distortion had significantly reduced in price, rather than viewing price cuts as value for money.</p> <p>Would not support Purchase for Destruction scheme or other market support in favour of gradual unwinding. FSA duty to ensure consumer confidence not undermined by PFD scheme which gradual approach would negate.</p> <p>Exports essential part of market stability. Must be substantial changes/removal of DBES to coincide with OTM rule changes. Gradual reintroduction necessary interim step to allow DBES changes so surplus generated do not undermine whole home market. FSA must play part in securing support and acceptance for changes to the OTM rule from European FSA.</p>
Northern Ireland Meat Exporters Association (NIMEA)	All cattle preceded by August 96	<p>Little point in differentiating between cattle born before or after Aug 96 if tested, age of little consequence. FSA should confine itself to deciding on basis of science that OTM rule is no longer needed and leave it up to Govt implementers to introduce opinion in a practical manner and if necessary, apply a birth date control. Understand further cohort culls would be required if All cattle option accepted - this may cause problems in GB which would not apply in NI - should not hinder NI from implementing a different regime to GB.</p> <p>Pilot scheme should be introduced forthwith as a transitional measure to have the system running smoothly and efficiently by the switchover.</p> <p>Change must be subject to safeguards: no food safety confidence issues; retailers must be prepared to accept sale of OTM; support system similar to "Product for destruction" to underpin market; once changes adopted, DBES must be replaced with total lifting of export ban; essential all OTM beef Farm Quality Assured to ensure marketability.</p>
PRS & EB Scott, Moorland Farm	xxxxx	<p>Concerns regarding cost and slaughterhouses being prepared to handle OTM cattle. Require FSA to ensure that farmers who retail their beef to the public are able to get OTM cattle slaughtered at local abattoirs by providing a practical and workable protocol.</p>

		Weaknesses in cattle id and traceability prior to 1998. Doubtful if 1996-98 records meet requirements to have evidence of comprehensive and reliable id procedures. Testing system untried - should be in two steps: Year 2000, review and then extend to 1998. Reopening of export markets vital. Gradual approach necessary to maintain consumer confidence - May 03 Guardian poll shows only 38% trust government on food safety supporting earlier work that government least trusted source of food safety information: FSA should undertake consumer attitude research before decision is taken. Some evidence of collapse in price of cull ewes and cull sows leading to over supply and cheapness led some consumers to ask what was wrong with it. FSA has responsibility to take account of consumer confidence. Cannot afford a single failure with +ve animal entering food supply - pointing to precautionary, gradual approach to introductory period.
Quality Meat Scotland (QMS)	01.01.00 then Oct 98	
Royal (Dick) School of Veterinary Studies, Edinburgh University (RSVS - E)	August 96	Risk substantially higher in cattle born before August 96. Marketing problems with sudden release of all OTM cattle
Royal Pharmaceutical Society	xxxxx	No comments
RSPCA	xxxxx	Concern for welfare if value of older animals reduced if export market not reopened in line with OTMS closure. Interim market support may need to be needed as well as persuading the consumer that the consumption of older, tested beef is safe to eat. Do not want to see resumption of live exports for slaughter.
SAC Veterinary Services, Perth	01.08.96 but give due regard to phasing in	Feed ban; animal id; BSE prevalence; enforcement cost modest compared to potential adverse impact on consumer perception. Essential that BSE survey of fallen stock continues to ensure level of BSE continues to decline. Due regard should be given to health and welfare of cattle - potential implications to sudden drop in value. As ethical organisation FSA should give due regard to phasing in arrangements to avoid sudden drop in value.
Sainsbury's Supermarkets Ltd	01.01.00 for one year, then Oct 98	Accept lifting restrictions is justified but conscious customers may view change as erosion of safety standards in interest of costs - refuting allegations difficult while DBES bars OTM beef. Urge FSA to adopt precautionary approach and recognise need for effective customer education programme in advance of change. Real risk of market disruption caused by supply outstripping demand.

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Scottish Association of Meat Wholesalers (SAMW)	01.01.00 then Oct 98	<p>Too many market issues and ultimately consumer confidence make All/August 96 options untenable: cautious reintroduction more appropriate in particular for complete confidence in testing regime and pilot trial of system. Too much emphasis on budgetary savings - getting it wrong would be disastrous and costly. FSA should give careful consideration to communication with consumers, retailers, caterers &amp; manufacturers to ensure understanding. Food safety and market impact intertwined with consumer confidence. Need to ascertain if EU would accept testing less than 100% OTM cattle or further delay reopening export market. Without proper support measures, additional abattoir costs will create price pressure which may cast doubt with consumers. Implementation caveats set out in the report underline need for extreme caution.</p>
Scottish Federation of Meat Traders' Associations (SFMTA)	Oct 98 after Jan 01 pilot	<p>Official records for animals born before Oct 98 are incomplete and so could not provide required level of identification and traceability. Gradual approach would be prudent with pilot testing period using animals born after Jan 01. If public link cost with a public health issue they could lose confidence in scientists, Government etc as happened in 1996. Removal of OTMS has to be projected as a justifiable scientific decision. Need to explain that vCJD cases will still occur. Given delicate consumer confidence, important do not do anything too quickly and to build up robust testing and systems that will give consumer assurance. Assurances must be given over effectiveness of testing. Transparent and reliable testing system is key to consumer confidence. Abattoirs have not indicated their level of interest in accepting OTM cattle where UTM are killed so cannot assess practicality of accepting both age groups. Danger that some abattoirs will not take OTM which would cause animal welfare problems.</p>
Scottish Food Advisory Committee (SFAC)	Oct 98	<p>Unanimous agreement that risk assessment indicated no scientific reason to continue current regime and that current measures disproportionate to risk. Any change would have to be proportionate, not driven by cost to Government.</p> <p>In interest of maintaining consumer confidence, preferred an initial move to a date cut off even if risk assessment showed risk very similar and very low whether birth-date cut off used or not. Preferred 1998 date as move away from 1996 would only affect small number of 5-7 year old cattle but allow greater consumer confidence in cattle traceability, with double tagging and cattle passport system more robust. Support heavily qualified that new regime would have to be transparent and demonstrably robust in testing and traceability. Advance explanation to public and media would be crucial to avoid loss of consumer confidence in Govt handling of food issues. Fact that vCJD cases will continue to occur irrespective of a change in the OTM rule needs to be explained to the public.</p>

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Scottish Landowners Federation (SLF)	Neither: 01.01.00	Maximum confidence and minimal risk. Would allow beef industry to adjust. Enable consumer choice of a different product, adding to public confidence and securing public health. Consumer confidence - cattle traceability prior to 1998. Progressive dismantling of the rule and OTMS is more important than using such public health measures to ensure market stability and support.
Soil Association	August 96	Eliminates any cattle born before feed ban fully effective and would not cause cohort problem. If adopted, there should be continued compensation payment for those cattle not eligible to enter food supply. From marketing, as well as public health point of view, date later than 1996 would be preferable. Any relaxation of current regime which has helped grow confidence in beef consumption and return of exports must not result in consumer confusion over safety of beef resulting in consumption downturn, nor cause reduction in income of crofters and hill farmers.
Somerfield Stores Ltd	August 96	Date feed ban became truly effective and those born before pose higher BSE risk. Own use of OTM beef likely to be limited - certainly not likely to feature in fresh meat offer: will review use for processing but will follow views of customers.
State Veterinary Officer, Jersey	All Cattle	Agree maintaining the OTM rule is disproportionate.
Tenant Farmers Association (TFA)	Over 48 month rule with continued buy-up scheme	If 48 m rule not acceptable, then a time after which the age would not be a barrier - to allow an orderly transition towards complete removal of the rule. Essential to have a disposal scheme for animals which continue to fall outside. Would not support any proposal for complete removal overnight. Concerned no consumer research into relaxation of the scheme - fear backlash if rule is removed. Has any research been done and would FSA be prepared to share it?
The Cibus Group	All Cattle	8/96 option sends wrong signal to public, and more complex to manage. No doubt we need these animals in the food supply and that public health can be protected by proposed measures rather than wasteful and costly destruction programme.
The Co-operative Group	August 96 plus 2 years	Some concerns that Aug 96 might be risky as close to feed ban which may have been flouted in early days. Support date based option on basis that cattle born after Aug 96 have reduced risk of developing BSE. If date born scheme chosen, there should be a progressive lifting of the ban. One approach would be to allocate slaughter periods for designated age categories until such time as the market is stabilised.
The Countryside Agency	xxxxx	Welcome work in progress but OTM rule not an area of particular expertise: No comments
The Highland Council		Change must take account of consumer confidence, food safety and market for beef. Imperative consumer confidence not jeopardised, commitment to protecting consumers from unacceptable risk must be ensured. Resumption of exports will be important to mitigate effect of OTM change. Timing should take account of CAP changes. OTM test & vertebral column requirements should be made clear to the public in an appropriate way.

## General

UK Association of Frozen Food Producers (UKAFFP)	01.08.96 (or later)	All cattle option implies no need for rule in first place and traceability impossible; later date would minimise market disruption
Ulster Farmers' Union (UFU)	October 98, with 01.01.01 pilot	<p>More effective and reliable traceability of all animals throughout the UK; market impact would be lessened and markets more time to adjust; provide more breathing space for testing logistics to become established; would like to see DBES changes in parallel. Imperative scheme remains in place for animals born before cut off date which continues to offer a fair price. FSA cannot ignore potentially severe market consequences if handled poorly. A well co-ordinated approach involving staged withdrawal, rebuilding domestic and export markets, education and support for consumers, practical and workable testing will be vital to successfully moving forward.</p> <p>Back calls for pilot to be conducted on animals born after 01.01.00 to test reliability and practicality of new arrangements and ensure worst fears do not materialise.</p> <p>Decisions on hasty withdrawal should not be taken without full and in-depth evaluation of the consequences.</p>
Veterinary Public Health Association (VPHA)	01.08.96	<p>More acceptable to the trade and public. Many [pre Aug 96] would come from high risk age bands which public might consider unacceptable. Fully endorses proposed action but to make it work effectively detailed work will be necessary and more important to get it right than to launch on a particular day when adequate preparations have not been made.</p>
Welbatch Farm	August 96	<p>Because know when born. Allowing all cattle would be political disaster.</p> <p>Important OTMS continues at price level comparable to value of younger barren cows - otherwise farmer may be tempted to have supplies of duplicate tags and if younger cow dies, swap identities. Only evidence would be freeze brands. If price differential arose, lot of farmers would be tempted to cheat, with inevitable loss of consumer confidence.</p>

**OTM RULE REVIEW: CORE STAKEHOLDER GROUP REPORT  
CONSULTATION RESPONSES**

Changing from the OTM rule is justified

1. While bearing in mind the considerable uncertainties which still surround BSE, the Core Stakeholder Group concluded (paragraphs 47 to 50):

the results of the risk analysis indicated that the additional public health benefit provided by the OTM rule was small;  
the cost of maintaining the OTM Scheme and OTM rule was large; and

maintaining the rule was therefore disproportionate to the level of public health protection and that a move to replacing the rule by testing OTM cattle justified.

Do you agree with this conclusion?

<b>Company/Organisation</b>	<b>Do you agree with this conclusion?</b>
Association of Independent Meat Suppliers (AIMS)	Provided FSA handles public confidence issue successfully and abattoir practices workable and cost effective, committed to using share of OTM throughput that comes back on to the market.
British Institute of Agricultural Consultants (BIAC)	Agree risk analysis conclusion that cost of maintaining OTMS at present given low and declining incidence of BSE is disproportionate. Concern that any change should be workable without compromising beef safety.
British Meat Federation (BMF)	Note RAG had concluded risk had reduced to the point where there appears no scientific reason for not adopting either option.
British Meat Manufacturers Association (BMMA)	Encouraged by recommendations following risk assessment that FSA feels move to replace the rule would be justified. Applauds emphasis on scientific risk assessment and welcomes progress in elimination of BSE.
British Veterinary Association, Scottish Branch (BVAS)	Delighted risk assessment shows relaxation of the rule is possible. However number of concerns about implementation. BSE risk remains not proven. Theoretical risk will fall further with gradual fall in cattle population born before Aug 96. Testing should greatly diminish the risk. Therefore appears risk is disproportionate to cost.
Comhairle nan Eilean Siar	Welcome view that changes unlikely to give rise to an additional death and note options considerably less expensive than the rule.
Consumers Association (CA)	Number of outstanding questions which need to be addressed before could support change. Agree highly precautionary approach still needed. Cannot at this stage state controls "robust and effective". Important to consider how BSE risk perceived by the industry - essential that do not perceive relaxation of controls that BSE measures no longer a priority.

Change

Crofters Commission (CC)	Crofters do not make great use of OTMS other than to dispose of breeding cows at end of breeding capability. Crofters produce store cattle. Price paid by finisher determined by slaughter price. Increase in supply will push down price and influence revenue breeders get.
EM Consultants	Appreciate the argument.
Family Farmers Association (FFA)	Fully supports termination of OTMS - continuation would be damaging because it suggests beef may still be a danger, represents a waste of nutritious food, replaced by imports, current scheme costs the taxpayer £700 million a year. Additional risk would be infinitesimal.
Farmers For Action (FfA)	Disastrous to scrap the present scheme or even reduce age to post 1996. Biggest danger would be another death from vCJD - only a matter of days before media would destroy the UK beef industry forever. BSE not the fault of UK farmers. Appreciate Govt cannot be expected to fund OTMS indefinitely but who is going to put price on the head of one unnecessary vCJD death? Hope FSA will take great care when take decision not to scare public in respect of this terrible disease which would destroy the UK beef industry.
Farmers Union of Wales (FUW)	Welcomes decision to review OTM rule as this reflects success of combating BSE. However universal concern of impact of sudden, substantial, or total lifting of the rule.
Foodaware: the Consumers' Food Group (F-CSG)	<p>Accepts need to review the rule given scientific and legal developments since its introduction. However, public health concerns must remain paramount, whatever the economic considerations and convinced this must be so perceived by consumers if public confidence is not to be eroded.</p> <p>Decline in BSE cases is not in line with predictions and inadequate explanation of cases born after 1996. Uncertainties remain about TSEs. NCC and FSA research shows consumer risk perceptions remain salient and change risks being viewed in a negative light. Research into consumer response to change in controls is needed.</p> <p>Rule should not be replaced unless and until testing is certain to work as effectively [as the rule].</p> <p>The extremely small predicted increase in risk may be some grounds for argument in favour of change to birth date limit for specialist beef herds. Need greater transparency over risk assessment issues as unclear what assumptions and judgements have been made in the model.</p>
Food Commission (FC)	Reluctant to accept modelling without more open scientific debate. Cannot judge number of contaminated animals entering food chain until more animals are tested.

General Consumer Council, Northern Ireland (GCCNI)	Support proposal to move away from OTM rule and recognise need for realistic, proportionate action. Welcome recommendation that OTM rule should not be changed until an effective BSE test in place. Strongly believe acceptable levels of public health protection should be based on robust science. Recommend quality and safety standards should be harmonised with the UK at EU level. Research should be on-going and FSA position on OTM rule should reflect new knowledge. Recommend precautionary principle still be applied. Concerned that change may cause some irregularities in vCJD statistics.
	Enthusiastic about possible resumption of OTM sales. Imposition of OTM ban had serious implications for the conservation sector. Graziers withdrew from long established tenancy arrangements when it became clear slower growing, traditional breeds adapted to grazing semi-natural unimproved land would be placed at a disadvantage leaving important wildlife sites without main form of management.
Grazing Animals Project (GAP)	Strongly in favour of OTM relaxation which will benefit extensive and conservation grazing systems as long as FSA confident human health risks are small enough. Change would bring UK in line with other Member States. This is reasonable since disease rates have reduced to levels comparable with other countries. OTM rule has decreased availability of mature animals due to loss of income as most breeds that can be fattened on grass do not mature until OTM. To grow to full killing weight at 30 months ironically usually requires it to be fed concentrates.
Health and Safety Executive (HSE)	Not in a position to comment on whether OTMS should continue. Interest lies in health & safety of employees involved.
Human BSE Foundation (HBSEF) JM<wisebarin@yahoo.co.uk>	Notwithstanding cost considerations, cannot accept any change which might increase vCJD risk, no matter how small that risk. Agrees there should be change.
Livestock and Meat Commission for NI (LMC)	Agree with the conclusion on the basis that assume FSA has fully evaluated relationship between potential additional vCJD deaths and the two options.
Meat and Livestock Commission (MLC)	Agree justified on basis of risk assessment but should set out circumstances which would trigger reappraisal.
National Beef Association (NBA)	Disruption to the beef market could be interpreted as evidence that consumers have rejected older beef on safety grounds and undermine credibility of beef. Pleased FSA regards risk associated with older beef so slight that it can now be re-introduced. If August 96 chosen would like to see further review with view to allowing all cattle in at a later date.

National Consumer Council (NCC)	<p>Welcome the report and process by which it was produced. Understand both economic and legal drivers to review the OTM rule, but public health concerns should remain paramount and highly precautionary approach continues to be warranted. Before changes made would wish to be assured that arrangements, including testing, would offer no less significant consumer protection. Plus, testing regime should be shown to be capable of competent and effective introduction and operation. Highlight need for greater consideration to be given to impact of changes on consumer risk perceptions and how changes will be communicated to consumers. Accept on basis of model that increase in risk likely to result in less than 1 additional vCJD death. Also note model based on considerable uncertainties and assumptions - not clear extent to which uncertainties are accepted by other researchers. Recommend need for peer review to determine robustness of the forecasting model. Such uncertainties warrant need for continuation of highly precautionary approach.</p>
National Council of Women of Great Britain (NCW)	<p>Accept need for review from both proportionate risk and economic standpoints. However public safety must be main issue. Questions about BSE cases in new herds have not been answered. Is suspected contaminated feed route sufficiently supported by scientific evidence?</p>
National Farmers Union (NFU)	<p>Risk assessment and balance of risks and benefits justify a change. However, essential to maintain consumer confidence by ensuring accompanying measures are fully in place, resourced and tested to verify workability and reliability. Recommend pilot before full implementation to maintain consumer confidence, test operational procedures and reduce market disruption.</p>
NFU Scotland (NFUS)	<p>Agrees OTMS should be unwound on basis of risk assessment providing measures are taken to ensure current confidence is not affected. While unwinding the OTM rule may be justified on risk assessment, consumer confidence would best be served by a gradual approach to allow all aspects surrounding reintroduction to be properly tested and analysed.</p> <p>FSA must carefully consider impact of changes and communicate these in a clear and concise manner to the public before any changes are implemented. Quotes from FSA Feb 03 research "Public Knowledge of BSE" and believes general public's reaction to change, which may be media driven, must be given serious consideration and merits a cautious approach from the FSA to public acceptance. From consumer perspective costs of maintaining the rule should not be a factor but have been referred to in the consultation. Such comments open FSA review up to criticism that monetary concerns, rather than food safety or consumer issues are driving it. Reference to cost of maintaining the OTMS and rule as "large" are therefore misleading. FSA should focus on consumer health and consumer confidence: consumers best served by a gradual reintroduction.</p>

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NIMEA	Agrees risk analysis conclusion that OTMS should be phased out. The rule should be replaced by testing in line with the rest of the EU. Given most recent scientific opinion, either option is justified. Changing the rule will also affect marketing of UK beef which will have a ripple effect on other Member States. To ensure least upset and highest acceptance of OTM beef caveats apply: change must be accompanied by full lifting of export ban; to maintain public confidence, there must be an advertising campaign by Govt/FSA declaring no difference in safety of UTM and tested OTM. Indications from market place that it will give commitment to use OTM provided it has full FQAS: essential this message got across to farmers so can prepare for change in marketing. Must be a contingency plan for "Product for Destruction" type scheme should there be a collapse in the market - though not envisaged necessary at this stage.
PRS & EB Scott, Moorland Farm	Hope that when OTM rule is lifted subsequent protocols enforced at local abattoir does not discriminate against farmer/retailers in favour of supermarket profits.
Quality Meat Scotland (QMS)	Agree additional public health benefit provided by OTM rule small but disagree conclusion that this allows whole scheme to be dismantled. System must be introduced gradually to ensure continued consumer confidence. Not clear how assertion that cost of testing more appropriate to level of risk without assessing industry cost.
SAC Veterinary Services, Perth Sainsbury's Supermarkets Ltd	Concur that changing the rule is justified although this assumes that lab tests will be sufficiently robust, sensitive and specific to assure test positive animals do not enter the food supply. Accept Group's conclusion
Scottish Association of Meat Wholesalers (SAMW)	Welcomes statement that return of OTM cattle presents no significant risk to public health. This will provide opportunity to revert to more normal trading patterns but must be implemented in planned and managed way.
Scottish Federation of Meat Traders' Associations (SFMTA)	Accepts scientific advice points to relaxation of the disposal scheme. Important public do not perceive this as a cost driven decision. If they link cost with a public health issue they could lose confidence in scientists, Government etc as happened in 1996. Removal of OTMS has to be projected as a justifiable scientific decision. Need to explain to the public that vCJD cases will still occur because incubation can be up to 40 years. Given delicate consumer confidence, important do not do anything too quickly and to build up robust testing and systems that will give consumer assurance.

Scottish Food Advisory Committee (SFAC)	<p>Unanimous agreement that risk assessment indicated no scientific reason to continue current regime and that current measures disproportionate to risk. Any change would have to be proportionate, not driven by cost to Government.</p> <p>Support heavily qualified that new regime would have to be very robust in testing and traceability. Importance of gearing up MHS stressed.</p> <p>Advance explanation of explaining to public and media would be crucial to avoid loss of consumer confidence in Govt handling of food issues. Not possible to rule out subsequent vCJD epidemics with longer incubation periods will require continuing close surveillance.</p> <p>Noted that even if vCJD had peaked number of cases will continue to occur irrespective of a change in the OTM rule: this fact needs to be explained to the public.</p>
Scottish Landowners Federation (SLF)	<p>Agrees that changing the rule is justified given the relative risks and financial cost of maintaining the rule and the OTMS.</p> <p>In favour of change if risk analysis is correct and there is little increased threat to public health. OTM rule means organic producers preferring traditional, slower maturing breeds with forage based diet at a disadvantage. Removal of the rule will allow more extensive finishing with less reliance on concentrate usage - particularly beneficial when derogation allowing percentage non-organic feed ends in Aug 2005.</p>
Soil Association	<p>Vital FSA give due recognition to importance of OTM rule in stabilising the beef market in March 96. Retail industry largely used OTM cattle to source all meat purposes. Had advantage of significantly reducing potential for animals suffering from BSE entering the food supply. Now time to review the position and to reconsider the way forward. Believe it now appropriate to consider changes but changes must be strictly enforced once and changes only [implemented] once it has been proven that level of control can be achieved.</p>
Somerfield Stores Ltd State Veterinary Officer, Jersey	<p>Agrees conclusion that maintaining the OTM rule is disproportionate.</p>
Tenant Farmers Association (TFA) The Cibus Group	<p>Pleased science showing much reduced threat from older animals to extent rule can be relaxed. Hope this will feed through to other aspects of trade extent export of live cattle. Concerned that trade not adversely affected by influx of product onto the market.</p> <p>Agree</p>

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The Co-operative Group	<p>Overall agree with general conclusion that OTM rule can be changed. This is based on understanding that the various controls have generally been successful. Removal of the rule is appropriate provided it does not significantly reduce level of public health protection and provided the option to re-introduce the rule remains open should that course of action be appropriate.</p> <p>Question whether there will be a market and ask if there has been any research to establish whether the public regard the risks as small and perfectly acceptable or whether they will see this as a cost saving measure for the Govt and an attempt by the industry to use potentially cheap material. Ask if consumers will reject use of OTM beef. Recall reaction to information about flooding the market with beef from intervention. Question mark about reliability of the testing protocol and repeatability of the results which needs to be borne in mind.</p>
The Highland Council	<p>Agree maintenance of OTM rule disproportionate does seem justified by Core Stakeholder Group and testing preferable but efficient and reliable testing must be in place before change implemented. Allowing OTM beef onto market will expose UK to increased imports - appropriate strategy should be developed to handle increase in beef supplies - would welcome further information on Defra stakeholder group.</p>
UK Association of Frozen Food Producers (UKAFFP)	<p>Agree conclusion that change justified. Support change, providing consumer confidence not damaged - sensible to time change alongside change in BSE status. Effective communication with the public &amp; media must be prime FSA objective.</p>
Ulster Farmers' Union (UFU)	<p>On basis of scientific advice, logical to conclude that changes could be justified at this time.</p> <p>Encouraging to note BSE epidemic declining to such extent that now possible to consider overhaul of OTM rule: positive development from consumer confidence point of view and care must be taken when implementing potential changes not to damage public confidence. FSA cannot ignore potentially severe market consequences if handled poorly. A well co-ordinated approach involving staged withdrawal, rebuilding domestic and export markets, education and support for consumers, practical and workable testing will be vital to successfully moving forward.</p>
Veterinary Public Health Association (VPHA)	<p>Change only possible if public health risk is reduced: clear from number of clinical cases of BSE that risk is much reduced. Problem is that there is a strong financial argument for change. Needs to be a clear presentation of risk assessment identifying which factors are significant in reducing the risk to the public and consideration of the alternative control mechanisms. In past introduced something nationally of greater protection to the public than was available elsewhere. Arguable EU now provides better protection by not allowing carcasses to be released until they test -ve. On basis of information provided supports the change but hopes that view expressed that current action is disproportionate is based on risk and not just potential financial savings.</p>

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Welbatch Farm

Scheme has been very important and successful in maintaining public confidence but cannot burn barren cows forever. Accept risk to public health via OTM meat is small but public perception is most important and perception of foreign buyers.

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**OTM RULE REVIEW: CORE STAKEHOLDER GROUP REPORT  
CONSULTATION RESPONSES**

The options

2. The Core Stakeholder Group agreed two alternative options to the OTM rule should be considered (paragraph 85)

Allowing cattle born after 1 August 1996 into the food supply; or

Allowing cattle of any age into the food supply.

Which of these options do you prefer? Why?

NOTE: EU-wide rules require a negative test result for BSE and for the vertebral column to be removed from OTM cattle slaughtered for human consumption before the carcass is released into the food supply.

Company/Organisation	Which option	Why
Association of Independent Meat Suppliers (AIMS)	Oct 98 as an interim measure	Understands concerns expressed by some ref Aug 96 - Oct 98 traceability and testing but confident protocols will be robust on basis of proposed piloting later this year. Could support Oct 98 as an interim measure if that what FSA decides.
British Institute of Agricultural Consultants (BIAC)	All cattle	Aug 96 alternative invites arguments about food safety and raises complications about verification of age.
British Meat Federation (BMF)	August 96 with provisos- must be no food safety confidence issues, retailers must be prepared to accept OTM beef, DBES dismantled, support system in place to underpin market.	No guarantee that gradual reintroduction (01.01.00 etc) would be acceptable to the EU, building new domestic market could require volumes that gradual reintroduction might not be able to supply: damaging in itself. Surprised options had been narrowed to two, one of which appears ruled out by Defra. Number of major concerns: public confidence - look for positive steer from FSA and for political statements of support from SoS and PM. Govt must ensure no trade discrimination of OTM beef. Important European Commission has confidence in UK arrangements. All OTM beef should be Farm Assured. Need acceptance of OTM beef which does not lead to labelling "Tested for BSE". Believe there will be a market for OTM beef in manufacturing, mince and food service sector which will replace imports. Fundamental to recovery of sales that export market reopened. Price likely to be disappointing, at least initially, therefore August 96 option needs to be coupled with support system eg Slaughter for Destruction. Collapse in beef market would attract publicity and raise public concern.

British Meat Manufacturers Association (BMMA)	01.01.00 then 1998 as part of phased programme	Do not support August 1996 due to shortcomings in cattle identification and traceability system before 1998. If procedures break down so will consumer confidence, so should be tested first on a smaller number of animals. Once shown to be effective and consumer confidence assured, born after date should be put back as part of a phased programme. Reassured that pragmatic decision by Defra that all cattle option ruled out and add support to need for demonstrable evidence that controls can be effectively implemented without losing consumer confidence.
British Retail Consortium (BRC)	01.01.00 then 01.10.98 after formal review	Consumer confidence and commercial stability: Cohort cull rules out All cattle option which would be seen as being dismantled for commercial reasons not conducive to precautionary principal. Effective traceability wef Oct 98; age of cattle entering system would initially be moderated; manageable number of tests - problems encountered in Germany - feasibility of lab accreditation in time period; phased approach would allow better understanding of acceptability and demand; publication of results would provide greater clarity of controls and potentially enhanced consumer confidence.
British Veterinary Association, Scottish Branch (BVAS)	August 96	Preferable to total removal although a slower approach could aid market recovery and prevent market flooding. Total removal could place burden on labs trying to test in time for sale. Coupled with testing would give public reassurance that every measure was still being taken and allow for graded entry of older cattle back into food supply. Grave concern that public see regulations fully operational one day and gone the next, may perceive risk which could affect confidence. Real fear that market could collapse which could backfire with farmers withholding stock and forcing price increase with potential welfare problems with retained stock to feed. Reduced returns could lead to welfare problems if veterinary fees were reasoned to be excessive relative to animal value.
Comhairle nan Eilean Siar	All cattle	Given that testing would prevent an infected carcass entering the food chain and particularly as difficulties in determining the age and enforcement.
Consumers Association (CA)		Given limited impact between different date of birth options, 01.08.96 seems most sensible. Uncertainty about No BSE animals born after 01.08.96 and how dealt with in the risk assessment.

Crofters Commission (CC)	Phased/Aug 96	Favour phased removal so that market can absorb expected increase in animals. Rolling programme will ensure acceptable return to normal marketing of cattle that should not depress primary breeders income. No BSE cases in Highlands & Islands in cattle born after 1996, occasional case in cattle born before Aug 96 justifies retention of OTM scheme for stock born before Aug 96: important to remain vigilant to prevent any contaminated material entering food supply.
Defra	August 1996 from Jan 04 - with review early 2005 if all cattle option preferred and cohort cull complete if embarked upon.	Food safety aspects for FSA but other practical consideration to be taken into account: cohort cull
EM Consultants	Phased based on date of birth	Strongly recommend a phased introduction which will allow an ordered and safe development of the market. Removal of OTM rule will result in around 30% more beef on the market which could have consumer health and confidence implications: UK market will not have been using cow beef for 8 years - this will not be a ready replacement for imports; major market for cow beef was France, unlikely recipient in the medium term; 1995 market would have to expand 60% to replace lost sales to France. If cow prices low/collapse mainstream abattoirs can not see value, no incentive to handle them. Could be animal welfare problem if farmers cannot sell their cows. Limited number of fringe operators who will see an opportunity to make a quick profit, not necessarily complying with testing requirements etc. Any such incident would damage consumer confidence in a product which needs to re-establish a market.
Faculty of Veterinary Medicine, Glasgow University	All cattle	Simplest and cheapest option would prevent confusion and although causing major upheaval in market place, these animals cannot be wasted forever. Reduced need for birth date and dentition checks and reduce chance of fraud.
Family Farmers Association (FFA)	August 96	Recognise all cattle option would cause severe disruption which would be reduced if pre Aug 96 cattle were excluded. May be necessary to phase in the new regime to avoid damaging effects to market.

## Options

Farmers For Action (FfA)	Phased: 6 month increase in age limit to 42 months every 6 months	If after this period, testing proved BSE was still on the decline, further increase in age could be gradually introduced. If OTM rule scrapped thousands of older cattle would enter food supply having disastrous effect on beef price; market needs to be in place for older dairy cows as was the case before 1996.
Farmers Union of Wales (FUW)	Phased: 01.01.00 coupled with clear procedures	Over supply. To provide a meaningful test of testing framework in addition to market's ability to absorb OTM. Both options likely to lead to over supply, market dislocation and possible implications for consumer confidence.
Foodaware: the Consumers' Food Group (F-CSG)	No change	Neither option acceptable at present and OTM rule should not be relaxed.
Food Commission (FC)	No change	Testing of cattle born before feed ban shows BSE prevalence of 1 in 1,000 - no cattle that old should be considered suitable for the food supply. BSE rate in cattle born after July 1997 has risen from 1 in 70k to 3 in 70k - until more tested true prevalence is not easily judged and no decisions should be made. Concerned that cause of BARBs remains uncertain. Recommends large increase in tests to gain accurate level of contamination levels and assess these prior to lifting OTMS.
Grazing Animals Project (GAP)	August 96	Management of reserves would benefit most from resumption of sale of prime OTM beef rather than cow beef. Product would be more acceptable to the public, perhaps providing a premium over meat from younger untested animals from intensive systems that do not favour the environment. Pre Aug 96 cattle should continue to get OTMS payment until testing and marketing for post Aug 96 cattle have been proven adequate.
JM<wisebarin@yahoo.co.uk>		Can see it would mean less stringency for id if age limit removed completely.
Livestock and Meat Commission for NI (LMC)		Analysis seems to point to the viability of allowing cattle of any age; from public health perspective, VPF cost difference between options significantly above the range normally used by Govt. Understand removal of pre Aug 96 cohorts would take some time to complete. If selection were based on market confidence criteria, better to opt for Aug 96 to eliminate cattle that carry risk of having been fed MBM.

Meat and Livestock Commission (MLC)	01.10.98 unless clear evidence testing failsafe & robust.	Concern about reconciliation of CTS data and samples, particularly for period 01.08.96 to 30.09.98. Have undertaken analysis of increased supply for various options and market. Purchase for destruction scheme should be introduced with effect from OTM rule change until normal exports resume.
National Beef Association (NBA)	All cattle	Risk to consumers is negligible as long as animal tested and other precautionary safeguards adopted. Cost saving, administrative simplicity, avoidance of management complication, including cattle id to check for animals born before cut-off date. No public health/food safety/implementation risk for post August 96 cattle to be regarded as significantly safer or for phased introduction of this type to be favoured.
National Council of Women of Great Britain (NCW)	Before changes are made would wish to be assured that arrangements would offer no less significant consumer protection.	Too many unanswered questions to agree the options at present. Pleased with the proviso - providing controls can be effectively implemented. Difficult to decide between the two because both dependant on rigorous enforcement and this must be made clear to the consumer. Marketing infrastructure would have to be re-instated.
National Farmers Union (NFU)	Oct 98	Enhanced consumer confidence and safety. Follows start of BCMS operations which established computerised records: consultation refers to need for effective cattle tracing. Indications that this would be preferred by the multiple retailers. Of two options put forward prefer August 96: Full range of BSE controls were implemented and there is clear evidence of effectiveness so consumers may feel more confident; Ref cohort cull, tracing animals more difficult for those born before August 96; seek reassurance on testing capacity to cope with numbers if all cattle option chosen; more adverse market impact; direct cost to industry would be higher.

NFU Scotland (NFUS)	01.01.00 as a pilot followed by Oct 98	To assess if necessary protocols and procedures are robust, to assess market impact and consumer reaction to changes. Would provide buffer against potential adverse publicity around any aspect of changes and allow FSA to meet duty of care to UK consumers. Gradual reintroduction necessary interim step to allow DBES changes. Following favourable industry assessment of pilot, would support reintroduction of cattle born after Oct 98 with OTMS remaining for cattle born prior to Oct 98. This would dovetail with BCMS database information when most readily verifiable and auditable system of cattle birth and movement notification was achieved. Would address FSA 2000 review concerns which questioned traceability of cattle born Aug 96 to Oct 98. SFAC also expressed concerns on pre 98 related to consumer confidence. Requires clarity why this position appears to have changed to support for the two options [set out in the Core Stakeholder Group report].
NIMEA	All cattle preceded by August 96	Little point in differentiating between cattle born before or after Aug 96 if tested, age of little consequence. FSA should confine itself to science, not get into practicalities of any option - this clearly indicates no reason to exclude cattle irrespective of date of birth. FSA should confine itself to deciding on basis of science that OTM rule is no longer needed and leave it up to Govt implementers to introduce opinion in a practical manner and if necessary, apply a birth date control. Understand further cohort culls would be required if All cattle option was accepted - this may cause problems in GB which would not apply in NI but NI processing industry still feel "All cattle" option is better: Fact GB system not as robust as that in NI should not hinder NI from implementing a different regime to GB.
Quality Meat Scotland (QMS)	01.01.00 then Oct 98	Weaknesses in cattle traceability and identification before Oct 98; concern that animals born 01.08.96 - 30.09.98 would meet EU export requirements - 2000 review requirement for evidence of comprehensive and reliable cattle id. For FSA credibility vital decisions consistent with 2000 review which envisage gradual phasing out. Volume too large under other options, process too new to guarantee consumer confidence. Phased approach would reassure consumer of precautionary approach being taken and avoid accusations that change for reasons other than food safety and consumer confidence and ensure new arrangements adequate.

Royal School of Veterinary Studies, Edinburgh University (RSVS - E)	August 96	Low human health risk posed by cattle born before Aug 96 but substantially higher than those born after Aug 96. Support continuation of OTMS for older cattle born before Aug 96 because sudden release of OTM rule for all cattle would generate marketing problems due to lack of demand. Partial lifting would allow market for cull cows to be reintroduced.
SAC Veterinary Services, Perth	01.08.96 but give due regard to phasing in	Date from which feed ban was fully effective; animal records better than previously; prevalence of BSE higher in cattle born before that date; costs of monitoring exclusion of animals born before is modest compared to potential adverse impact on consumer perception. Should not let small savings place at risk investment in restoring public confidence.
Sainsbury's Supermarkets Ltd	01.01.00 for one year, then Oct 98	Initially 01.01.00 to reduce probability that testing system will be overloaded and Oct 98 after a year and formal review. Traceability of cattle after Oct 98 & would facilitate cohort cull. Accept little difference in terms of risk but neither option addresses consumer confidence of OTM beef derived from cattle that have not benefited from current traceability requirements. Concerned that 2 of 3 labs will not be ready until November 03 and sophisticated logistics as yet untested.
Scottish Association of Meat Wholesalers (SAMW)	01.01.00 as a pilot and when shown to be satisfactory, Oct 98	Volumes involved with both options will seriously affect market in medium term which could give rise to consumer concerns; no indication that market support measures will be immediately available - Purchase for destruction would only be considered when market in crisis; reopening export market will take until 2005. Traceability issues raised in report puts doubt on earlier date being tenable. FSA's SFAC expressed concern about date earlier than Oct 98 relating these to consumer confidence issues. Note all cattle option effectively ruled out by cohort tracing difficulties.
Scottish Federation of Meat Traders' Associations (SFMTA)	Oct 98 after Jan 01 pilot	Cattle born before Oct 98 should continue to be disposed of through OTMS as official records for animals born before then are incomplete and so could not provide required level of identification and traceability. Gradual approach would be prudent with pilot testing period using animals born after Jan 01.

Scottish Food Advisory Committee (SFAC)	Oct 98	In interest of maintaining consumer confidence, prefer an initial move to a date cut off even if risk assessment showed risk very similar and very low whether birth-date cut off used or not. Move from 1996 to 1998 would affect small number of 5-7 year old cattle but allow greater consumer confidence in cattle traceability, with double tagging and cattle passport system more robust. 50% reduction in estimated level of risk although recognise this based on a tiny estimated level of risk for all the options and therefore not considered a meaningful message to present to consumers. Unanimous agreement that the science supported adopting the EU regime.
Soil Association	August 96	Eliminates any cattle born before feed ban fully effective and would not cause cohort problem. If adopted, there should be continued compensation payment for those cattle not eligible to enter food supply. Note Core Stakeholder Group considered Oct 98 option. From marketing, as well as public health point of view, date later than 1996 would be preferable. Later birth date would ease marketing situation. If it can be demonstrated that testing is practical and enforceable, there should not be an increased public health risk from either option. However, killing pre Aug 96 cohorts could cause major problems.
Somerfield Stores Ltd	August 96	Date on which feed ban truly became effective. Animals born before could have been exposed to greater level of BSE through feed and so pose higher level of risk: sensible precaution given high level of BSE in the UK. Important appropriate level of BSE testing is properly funded and available and that accuracy of the test is validated.
Tenant Farmers Association (TFA)	Over 48 month rule with continued buy-up scheme	To ensure all clean cattle could be sold on the market. If not, select a point in time after which the age would be no barrier to consumption of the meat to allow orderly transition towards complete removal. Managed removal to avoid unnecessary problems. Would not support any proposal for complete removal overnight.
The Cibus Group	All cattle	Aug 96 is sending the wrong signal to the public, would continue to prejudice exports; be more complex to manage and may be open to abuse.

The Co-operative Group	August 96 plus 2 years	Support Aug 96 but have some concerns that this might be risky as close to feed ban which may have been flouted in early days. Therefore suggest date of, say, two years after would be appropriate. There should be a precautionary, progressive relaxation of the controls. Testing entirely appropriate and propose testing of all animals introducing a system of positive release. Support date based option on basis that cattle born after Aug 96 have reduced risk of developing BSE. Point out that this does not preclude exposure through maternal transmission.
The Highland Council	01.08.96	Market less likely to be flooded. Positioning of OTM in the market will require careful thought to prevent knock-on effect on prime cattle value.
UK Association of Frozen Food Producers (UKAFFP)	Later than August 96	All cattle option would seem to abrogate need for OTM rule in first place; traceability would be impossible; minimise market disruption
Ulster Farmers' Union (UFU)	October 98, with 01.01.01 pilot	More effective and reliable traceability of all animals throughout the UK although NI could provide effective traceability whichever option chosen; market impact would be lessened and markets more time to adjust; smaller number will have to be tested providing more breathing space for logistics to become established; no guarantees that export restrictions will be relaxed in time for start of withdrawal from OTM scheme, critical for an already volatile market, grave concerns market outlet may not be easy to locate: would like to see DBES changes in parallel, NI would already qualify for "moderate risk" status - objective to be granted same market access conditions as other European competitors before OTM rule change implemented. Imperative scheme remains in place for animals born before cut off date which continues to offer a fair price.
Veterinary Public Health Association (VPHA)	01.08.96	More acceptable to the trade and public. Many [pre Aug 96] would come from high risk age bands which public might consider unacceptable. Decision has to be taken with regard to maintaining/restoring public confidence. Message been that OTM cattle are a problem, it will be difficult to persuade the trade and the public that even animals born after 01.08.96 are fit for human consumption.

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Welbatch Farm

August 96

To allow older cattle would be a political disaster if the media found some of these cows were infected with BSE. Until can live test, essential to stick to Aug 96 because know when those animals were born. Policing a date based scheme would be a nightmare and public would be confused and concerned.

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**OTM RULE REVIEW: CORE STAKEHOLDER GROUP REPORT  
CONSULTATION RESPONSES**

**Enforcement**

3. The Core Stakeholder Group considered that there should be safeguards to ensure the effective enforcement of a new regime (paragraphs 63 to 64). These were

If a birth date option were chosen, enhancements to cattle tracing and eartag allocation systems (particularly in Great Britain) to reduce error and fraud must be put in place;

A dentition check should continue to be carried out to ensure that the requirements to BSE test and remove vertebral column are applied all OTM cattle.

Do you agree? Do you have any suggestions on these measures?

Company/Organisation	Enhancements to cattle tracing and eartag allocation systems	Dentition checks
British Institute of Agricultural Consultants (BIAC)		Realise dentition estimation of age necessary to identify OTM carcasses. Important to recognise method is only approximate.
British Veterinary Association, Scottish Branch (BVAS)	Dentition check is always possible but given time cattle tracing and passports have been in place, there should be optimal security in this system - it is costly so should be effective and if not, fully investigated and corrected.	
Consumers Association (CA)	Agree reliable cattle id essential for birth-date limit 1% major discrepancies significant given numbers involved - steps should be taken to eliminate fraud. Concerned that operators would take the samples possibility of fraud if carcase health marked before receipt of test results	Agree dentition cross check necessary.
Crofters Commission (CC)	Measures must be put in place to ensure compliance with any date-based scheme. Must not burden producers with excessive measures that are impossible to comply with or so burdensome will discourage participation.	Dentition check remains acceptable method for checking age and should be retained.
Faculty of Veterinary Medicine, Glasgow University	Accepting all cattle would reduce need for birth date and dentition checks and reduce chance of fraud.	

Foodaware: the Consumers' Food Group (F-CSG)	Options dependant on rigorous enforcement which will require far greater resources. Highlight importance of reliability of cattle id procedures needed to permit traceability and prevent fraud. Traceability central and testing details for each animal would need to be entered on the passport in a reliable and consistent manner across the EU.	
Grazing Animals Project (GAP)	Need to know current level of fraud before agreeing to any increase in administrative burden. Identification should not be a problem following controls on issuing eartags by manufacturers preventing duplication. Loss of eartags a problem, particularly in rougher, remoter situations which require conservation grazing. Helpful if more permanent form of tagging could be agreed such as ruminal bullets. Strongly believe little justification for making the administrative controls stricter if animals have in any case tested free of BSE.	Notoriously imprecise measure of age with variation up to 6 months. Anyone taking animal to slaughter which subsequently failed dentition check could end up sacrificing value of entire animal.
Livestock and Meat Commission for NI (LMC)	Agree robust enforcement necessary to sustain high level of public confidence.	
Meat and Livestock Commission (MLC)	Agree recommendations. In addition consideration should be given to using CTS to place restrictions on BSE cohorts	No argument against dentition check but believe it a crude device.
National Beef Association (NBA)	Essential any change accompanied by full implementation of measures to maintain consumer confidence. Agree if birth date option chosen, cattle tracing and identification system should be enhanced. BCMS must be properly resourced and level of data errors reduced through improved IT and administrative procedures.	Documentation should be primary means of identifying OTM cattle. Dentition should only be used where there is manifest doubt.
NFU Scotland	Adamant that existing traceability and tagging systems are sufficient. Any proposals should be subject to industry consultation and should not result in gold-plating pushing additional costs and bureaucracy onto the primary producer.	In light of current traceability arrangements, there is a reduced need for dentition checks and associated costs. This should be subject to proper review.

## Enforcement

NIMEA	These safeguards should be in place irrespective of OTMS cull or testing. Difficult to comment further on what is required as report does not highlight shortcomings of present system. Unless shortcomings rectified, they will be there irrespective of which option chosen. Therefore in everyone's interest to rectify deficiencies and make one rule change.	
Quality Meat Scotland (QMS)	Not clear what is envisaged by enhancements to cattle traceability system. Proposed enhancements should be subject to consultation to ensure effective and without adding to administrative burden.	Agree dentition check should be continued but kept under review with view to phasing it out if risk assessment suggests no longer required.
SAC Veterinary Services, Perth	Question whether dentition would be of value in differentiating animals born before 01.08.96. If inadequate evidence to show born after 01.08.96, animal should be disposed of as an OTM. Farmers should not benefit from fraudulently supplying ineligible animals so compensation for animals born before date should reflect price of those born after. Essential OTM cattle slaughtered separately from younger animals to ensure checking and the 1b 2a rule complied with.	
Sainsbury's Supermarkets Ltd	Post 10/98 passports and double tagging reduce possibility cattle could be mis-represented. Cannot envisage traceability/identification enhancements would be applied retrospectively to reduce possibility of fraud for cattle born before Oct 98.	Believe dentition checks should continue.
Scottish Association of Meat Wholesalers (SAMW)	Agree comments and add BCMS must be adequately funded to undertake required enhancements. If traceability effective there should be no need to continue dentition checks. FVO report points to shortcomings which must be addressed - not least due to potential impact on exports.	
Scottish Food Advisory Committee (SFAC)	Endorse view that traceability system must be robust, clear and that it may be enforcement of the operation, rather than enhancements to the system that is required: suggest hand written reports, as distinct from computer generated reports cause problems.	Maintaining dentition checks important for ensuring consumer confidence, at least in early stages of change.
Scottish Landowners Federation (SLF)	Agrees enhancements necessary but not necessarily on grounds of error or fraud.	Dentition check would be excessive if traceability systems are working adequately.

## Enforcement

Soil Association		Differences between individual animals could lead to UTM cattle being classed as OTM. Prefer to ensure passport system and eartag checks are accurate and rigorously checked as the indicator of age.
Somerfield Stores Ltd	Concerns about passport system and eartag production: vital to ensure it operates to a better level than at present to ensure Aug 96 date maintained.	Appropriate but as animal ages, it is more difficult to estimate age by this method. Cannot replace passport system and eartag.
State Veterinary Officer, Jersey	Excellent cattle tracing and eartag facilities on Jersey so prefer enforcing date of birth option by use of cattle passports as opposed to continuation of dentition checks.	
The Co-operative Group	Question need for increased controls in terms of tracing and eartags. Implies current system is ineffective and OTM rules have been flawed. Important costs are not added unnecessarily as will damage competitiveness of British beef.	Agree dentition checks should continue alongside other inspection requirements.
The Highland Council	Planned enhancements to BCMS system must be in place before relaxation implemented.	Agree dentition check should continue but ineffective ref August 96 so reliance on passport and eartags as means of control would be increased.
UK Association of Frozen Food Producers (UKAFFP)	Essential for controls to be watertight. Would expect to be in line with those in other member states. Sufficient MHS capacity essential.	
Ulster Farmers' Union (UFU)	Agrees changes must be accompanied by effective enforcement regime. Cattle tracing system in NI recognised by EU as fully operational.	Given rigours of tracing system, documentary evidence should form basis of identifying OTM cattle. Dentition may be used as last resort if there are any question marks about age or identity.

Enforcement

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Veterinary Public Health Association  
(VPHA)

Supports both statements. Concerns about robustness of present passport system as depends on accuracy of information provided by the farmer. Do not seem to be sufficient independent validation of details to ensure correct age is always found on the passport. Too much burden is placed on MHS to arbitrate on anomalies between passports and dentition.

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Welbatch Farm

Important OTMS continues at price level comparable to value of younger barren cows - otherwise farmer may be tempted to have supplies of duplicate tags and if younger cow dies, swap identities. Only evidence would be freeze brands. If price differential arose, lot of farmers would be tempted to cheat, with inevitable loss of consumer confidence. Lot of double large yellow tags unreadable after only 3 years. Opinion of many farmers that metal tags deteriorated in quality because forced down by the market place. Govt should be insisting that every calf has a metal tag of high standard.

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**OTM RULE REVIEW: CORE STAKEHOLDER GROUP REPORT  
CONSULTATION RESPONSES**

**Implementation**

4. The Core Stakeholder Group recommended a number of provisos on the implementation of alternatives to the OTM rule (paragraphs 70 to 72 and 77). These were

Demonstrable arrangements for reliable and timely BSE testing and traceability of all parts of the carcass;

A transparent testing system, including the reporting of failures, subject to an independent review six months after implementation;

Effective arrangements for the removal of vertebral column from OTM cattle.

Do you agree? Do you have any other suggestions?

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**Company/Organisation**

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Association of Independent Meat Suppliers (AIMS)	Concerned if SRM removal under MHS supervision in any way compromised at critical stage in consumer confidence. Also members investing great deal of money in cutting and boning plants.
British Institute of Agricultural Consultants (BIAC)	Agree sound and transparent system of testing must be implemented. Concerned traceability of all carcass parts may be difficult to implement in case of mince. Agree effective method to remove vc from OTM carcasses must be developed.
British Leather Confederation (BLC)	Essential procedures are piloted to ensure they work effectively and can cope with the volume expected. New arrangements will apply so better if numbers increased steadily, rather than suddenly.
British Meat Federation (BMF)	LGC proposals for 14 hour turn-round with individual agreements which meet their particular needs will be acceptable. Testing system must be proved to be fully operational prior to launch date. Agree there must be a foolproof system to ensure full traceability. Suggest bar code labelling best solution although not all plants have system in place.
British Meat Manufacturers Association (BMMA)	Agrees conclusion that effectiveness of control regime would be crucial to maintain public confidence and supports recommendation that change should not proceed until demonstrable evidence that new controls can be implemented effectively. Concerned that with increased volumes, the opportunity for error will be increased: impact of systems failure on consumer confidence would be devastating.

**Implementation**

British Veterinary Association, Scottish Branch (BVAS)	Testing must be publicly proven to work and must be readily available. Ask who would operate the labs and at what cost to whom. Transparent testing system must exist. Review after 6 months is too late - it must be demonstrable prior to start. Suggest bar coding of samples and carcasses with electronic reporting to reduce likelihood of error. Comment that lab in Scotland not yet built.
Consumers Association (CA)	Essential comprehensive evaluation of how testing introduced in other member states and problems arisen before introduced in UK. Concerned about potential cross contamination within the slaughterhouse; adequate MHS supervision and training. Agree OTM rule change dependant on full and rigorous application of SRM controls. Need to ensure current BAS vertebral column removal system would work for much higher numbers. Phased approach, including an initial pilot would be sensible.
Crofters Commission (CC)	Agree any move away from OTM rule must be accompanied by reliable and transparent testing with traceability of carcase parts, accompanied by robust arrangements for OTM vc removal.
Faculty of Veterinary Medicine, Glasgow University	Good carcase identification and correlation would be needed until test results came back. Separate chills would be needed, monitoring by MHS and health marking should only be done once results known. If thought necessary, slaughterhouses could be designated only to handle OTM which would make enforcement and monitoring easier.
Family Farmers Association (FFA)	Safeguards vitally important to retain consumer confidence. Testing scheme must be in place and rigorously tested alongside new SRM and dentition checks at abattoir. Recognise controls will cost money to implement but this should be much less than cost of current OTMS.
Farmers For Action (FfA)	Imperative to get transparent testing system as early as possible. Hope system would give peace of mind to all who consume UK produced beef.
Foodaware: the Consumers' Food Group (F-CSG)	Testing regime should be demonstrated to be effective, reliable and transparently audited before considered as a replacement. Needs to be regularly monitored. Change to testing not acceptable until test developed that is both reliable and effective in early stage of BSE. Cattle present much higher risk in 12 months prior to clinical onset. OTM rule has advantage of relative simplicity. Rule should not be replaced unless and until testing is certain to work as effectively [as the rule]. In addition to regular monitoring, testing would require further research on improved testing and continued exchange of information with other Member states. Reservations about shift of responsibilities from MHS to in-house staff.
Food Commission (FC)	Consumers will be reluctant to assume procedures will be perfect from the outset. A dry run period is essential with full testing but no animals entering the food supply. Recommend 3 months dry run followed by an evaluation period.

## Implementation

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General Consumer Council, Northern Ireland (GCCNI)

Welcome recommendation that OTM rule should not be changed until an effective BSE test in place. There should be a system in place to trace and identify safe meat coupled with a secure records system.

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Whole case for removing OTM ban depends on effectiveness and precision of testing. This is a technical issue on which GAP unable to comment other than general view that adoption throughout rest of EU should validate its use in the UK.

Grazing Animals Project (GAP)

Requirement for vc removal is less than ideal. The most popular cuts of quality beef are on the bone. Common sense suggests that if the tests are reliable then bone-in beef would be just as safe as deboned as BSE will not be present. Many abattoirs would not elect to deal with OTM cattle if post-mortem preparations are over-burdensome and costly. Effectively only two abattoirs in UK licensed to kill BAS animals. Spinal column can only be removed at specially licensed cutting plant of which there seems to be only one in the UK. Such difficulties put small farmers at a disadvantage and make prospects of conservation grazing to supply a local market impractical. Hope that relaxation of OTM rule will improve situation as regards local sourcing of environmentally friendly meat.

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Health and Safety Executive (HSE)

Expects continued safeguards used in cull abattoirs to prevent exposure to BSE agent through inhalation or via mucous membranes, cuts or abrasions and asks if they will be introduced in abattoirs which slaughter OTM for food, including off-centre splitting of all cattle carcasses. Want to know about precautions and protocols if OTM/UTM cattle slaughtered at same premises with repercussions for cross contamination and if OTM carcasses would be kept in separate cold rooms and system if BSE +ve found, and about training. Interested in health & safety risk assessments and recommended safeguards.

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JM<wisebarin@yahoo.co.uk>

Suggestion that meat industry should have its own trained operatives to take samples may be sure that: if OTM cattle readmitted, FSA will insist that there is a demonstrable link between the carcase and the lab test result; MHS will be charged with overseeing the sampling and guarantee of id and other security aspects; MHS staff will be severely directed to see all this is done. Sampling, recording and despatch would be done by OVS - OVS has technical expertise to take samples of biological material and is aware of hazards; costly and inefficient for industry to train staff; just as much work for OVS to supervise as to do job themself - high level of auditability likely to be demanded; chances of fraud and malpractice should be reduced as OVS risks disciplinary action and peer censure; natural justice - questions if it is fair the producer should be asked to carry out a technical procedure demanded by a body representing the consumer and paid by the consumer to do so.

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Livestock and Meat Commission for NI (LMC)	Confidence as regards test and vc removal have been established in other Member States. Unaware of any major impediment of similar arrangements throughout the UK. Matter of costs to be borne by the industry will need to be considered, but recognise, this is not a public health issue.
Meat and Livestock Commission (MLC)	Endorse recommendation. Imperative testing proven watertight and robust. Before change should undertake comprehensive pilot across entire supply chain with at least 100k animals over 3-6 months: early warning of additional +ves to expect; results should be published and agree independent audit and review recommendation; consideration should be given to "flagging" cohorts on CTS.
National Beef Association (NBA)	Re-introduction depends on reliable and effective testing system. To meet EU standards depends on skills of FSA, MHS and Defra.
National Consumer Council (NCC)	Given history over introduction of BSE controls, imperative that testing regime would need to be working effectively before removal of OTM controls. Not reassured by statement that testing in other EU countries "appears" to have been successful as no evidence provided. Recommend reliable and transparently audited system of testing must be in place before OTM rule removed. Suggest this could be done on a pilot basis with no meat entering food supply. Seek reassurance on test reliability and stage of infectivity prior to clinical symptoms that test can detect +ve. Understand tests can detect infectivity 3 months prior to symptoms but as animals infective up to a year prior to symptoms, tests would not remove all pre-symptomatic animals.
National Council of Women of Great Britain (NCW)	Want to know what is the expected/actual % errors. Ask if resources be adequate to deal with increased throughput. System must be reliable regarding traceability and tracing before, not 6 months after the rule ceases to operate.
National Farmers Union (NFU)	Agree measures listed must be in place before any change is implemented. Essential any change accompanied by measures to maintain consumer confidence. Measures must be practical to minimise commercial disruption. Need assurance about adequacy of testing capacity at peak periods. Measures should be in place and their operation tested to ensure reliability and practicality - MLC suggest pilot based on 01.01.00 interim date.
NFU Scotland (NFUS)	To ensure systems are reliable, effective, transparent, auditable, practical and applicable on a commercial scale requires such systems to be fully tested and assessed. Deeply concerned that less than 6 months from proposed start such procedures have not yet been defined or tested and that fuller industry consultation not yet completed. Note site of testing lab in Scotland not yet confirmed and lab still to be constructed. Imperative if Jan 04 start date to be achieved, timescale and progress to date indicates that a pilot scheme would be in best interest of all concerned. FSA must reassure itself that all measures have been properly tried and tested. 2000 review recognised phased approach similar to that proposed by NFUS.

## Implementation

NIMEA	Agrees recommendations and findings. Recognise that each plant wishing to kill OTM cattle will have to put protocols in place. This should be part of HACCP system so that built in triggers maintain security of the product. The system for vc removal is well established due to fact beef from other member states has been coming to UK for some years. Require vc to remain in carcase during chilling and transport and have it removed at licensed cutting plant before sale to the consumer. To ensure testing regime capable of handling numbers and logistics of major change, pilot scheme should be introduced forthwith as a transitional measure to have the system running smoothly and efficiently by the switchover.
PRS & EB Scott, Moorland Farm	Introduction of OTM testing and associated abattoir protocol effectively destroyed the Beef Assurance Scheme. Concern that once OTM rule suspended will not be able to have OTM cattle slaughtered at local abattoir unless MHS protocol revised. Otherwise fear cattle would have to be slaughtered at dedicated abattoirs that service supermarkets and prevent return of own carcasses for retail to the public. Concerned that monopoly situation will develop and OTM price will be forced down to boost supermarkets and middle men. Require FSA to ensure that farmers who retail their beef to the public are able to get OTM cattle slaughtered at local abattoirs by providing a practical and workable protocol.
Quality Meat Scotland (QMS)	Agrees recommendation and supports provisos. Number of detailed queries raised including how inability to obtain a sample would be handled; what has changed since 2000 review which cast doubt on use of tests; need for testing facility in Scotland; how to avoid delays in results with 10% samples currently arriving in an unsatisfactory condition; training; cattle segregation; what happens if there is a positive result; blood, hide and offals; welfare if no market.
SAC Veterinary Services, Perth	Essential staff collecting samples and labs externally audited by UKAS. Recommend the 5 EU approved BSE tests are kept under continual review and developments to enhance sensitivity and specificity are made known to the labs so most efficient BSE test is undertaken.
Sainsbury's Supermarkets Ltd	Imperative procedures operate to highest degree of accuracy and reliability. Cannot comment on adequacy until details clear. Essential for arrangements to be communicated to consumers by FSA.
Scottish Association of Meat Wholesalers (SAMW)	Agree implementation provisos, particularly need for sound traceability and a transparent testing system subject to independent review, effective arrangements for vertebral column removal although some flexibility as to where this could be done would be helpful. Important to have full confidence in system. Advocate pilot trial to demonstrate full assurance of system: Testing must be transparent, auditable and seen to be handled effectively.

## Implementation

Scottish Federation of Meat Traders' Associations (SFMTA)	<p>Given delicate consumer confidence, important do not do anything too quickly and to build up robust testing and systems that will give consumer assurance. Assurances must be given over effectiveness of testing. Transparent and reliable testing system is key to consumer confidence.</p> <p>Agree testing should be subject to independent review six months after implementation.</p> <p>Agree proposals to remove OTM vc: this should develop away from a food safety issue and become a beef/industry/consumer assurance issue.</p>
Scottish Food Advisory Committee (SFAC)	<p>Fully support recommendations. Stressed this would be a huge challenge and system should be demonstrably robust. Some support for a pilot scheme; testing and sampling would have to be seen to be working in practice prior to scheme being rolled out. As part of HACCP arrangements, each plant should have MHS-approved documented plan in advance of processing OTM cattle.</p> <p>Arrangements would have to be more robust for segregation of offal, blood etc for slaughterhouses processing both OTM and UTM. Concerned abattoirs may be reluctant to take OTM cattle. Transparent system important element of robust, open testing system.</p> <p>Consensus there must be effective arrangements for vc removal from OTM cattle.</p>
Scottish Landowners Federation (SLF)	<p>Agrees recommendations. Reliable and timely BSE testing and traceability essential as are transparent testing system and effective arrangements for vertebral column removal. However, reservations with regard to practicality and costs of such measures. Same proportionality philosophy should be applied to measures in post OTM rule era.</p>
Soil Association	<p>Agree reliable testing and traceability of carcase parts must be in place before changing the OTM rule.</p> <p>Question whether vc removal is necessary if testing is effective. Number of popular prime cuts are marketed on the bone so deboning limits marketing potential. Extra chill space to hold carcasses while testing undertaken may cause problems for small local abattoirs unable to provide these facilities. Would like to see support for these abattoirs to be able to handle OTM cattle as these most likely to be used by organic producers who wish to produce independently traded product. Concerned very few plants have special licence to remove vc which limits options for organic producers. Do not want to have to send animals long distances or if slaughtered locally, carcasses to be transported adding to food miles and expense. Urge FSA to ensure increased provision for vc removal is made a priority before change in rule comes into effect.</p>
State Veterinary Officer, Jersey	<p>Effect in Jersey likely to be similar to all low throughput abattoirs: testing will mean difficulties in provision of adequate holding facilities for meat until test results are available; vc removal will cause considerable difficulties as this will have to be done at the abattoir in the absence of a dedicated cutting plant; as samples will be forwarded to the UK from Jersey by air courier, delays in analyses and reporting may be encountered.</p>

## Implementation

The Cibus Group	Agree. Suggest 24 hr cover at cutting plants to ensure volumes and necessary segregation could be effectively managed.
The Co-operative Group	Agree measures proposed although these should be reviewed at appropriate time intervals. Suggest there should be requirements for other Member States to report equivalent data being exempted only on evidence of safe levels. Recognise while arrangements necessary, potentially difficult to implement. Suggest there is a need to make results transparent, possibly through web-based publication. Where cattle test positive there should be further testing on the holding with compulsory culling of any positives and tracing of progeny.
The Highland Council	An efficient and reliable system of testing must be in place before OTM rule replaced. Agree reliable and timely testing essential to maintaining consumer confidence but not overly onerous on the slaughter industry. Agree 6 month review after implementation. Council sought derogation to derogation to TSE Regulations concerns regarding lack of facilities in remote areas.
UK Association of Frozen Food Producers (UKAFFP)	Agree. Adequate testing facilities and waterproof traceability essential for confidence in the new system.
Ulster Farmers' Union (UFU)	Concerns about effective implementation of testing, vc removal, traceability and segregation of carcasses and by-products, minimisation of market disruption, maintenance of consumer confidence. Back calls for pilot to be conducted on animals born after 01.01.00 to test reliability and practicality of new arrangements and ensure worst fears do not materialise.
Veterinary Public Health Association (VPHA)	Area fraught with difficulties. Agree general conclusions but vital for public confidence that full traceability system in place and can be independently validated. Vertebral column removal should be done as near to slaughterhouse as possible as inherent risk in allowing carcasses with SRM to be sent away. Who establishes that load sent is same as that received or did not arrive?  Storage of material pending test result could be a problem: need reliable control system. If +ve found, do we have a clear risk assessed appraisal of what action needs to be taken to remove risk from slaughterhouse environment? Local authorities should be fully briefed and included in information loop especially when carcasses moved for vc removal. Need cost-effective process that is appropriate and suitable for even the smallest abattoir. Ideally there should be full supervision at cutting plant to ensure process carried out satisfactorily. Risk assessment must be done for any reduction in level of supervision to demonstrate adequate consumer protection.

## Implementation

**OTM RULE REVIEW: CORE STAKEHOLDER GROUP REPORT  
CONSULTATION RESPONSES**

Further risk reduction measures

5. The Core Stakeholder Group made a number of more detailed recommendations on additional risk reduction measures (paragraphs 78 and 81). These were

Investigation to assess the potential for dorsal root ganglia to remain in meat when the vertebral column is removed and, if appropriate, to establish a protocol for this operation;

Exclude OTM casualty cattle from the food supply.

Do you have any views on these suggestions? Do you have any other suggestions?

Company/Organisation	Dorsal root ganglia	Casualties	Other suggestions
British Institute of Agricultural Consultants (BIAC)	Appropriate that studies should be implemented to find out extent drg may remain in beef after vc removal.	Agree casualty cattle should be excluded.	
British Meat Federation (BMF)	For both domestic and export markets vertebral column required to remain in carcase during chilling and transport and arrangements made for removal at designated licensed plant prior to sale to the consumer.		
British Meat Manufacturers Association (BMMA)	Support recommendation.	Supports recommendation to exclude OTM casualty cattle.	
British Veterinary Association, Scottish Branch (BVAS)		Must be backed up by a compensation deal which would not be greater than market value but would ensure welfare.	
Consumers Association (CA)	Welcome urgent investigation and protocol developed if necessary.	Agree given impact on risk estimates, casualties should be excluded but not clear if increased risk applies to all casualties or just OTM.	

Risk Redn

Defra	European Commission question whether test -ve casualties present elevated risk. Some Defra scientists have made the same point. If FSA decide to exclude for food safety reasons, Defra unable to fund new subsidy scheme. Analysis shows pre Aug 96 casualties pose the highest risk rate while post Aug 96 casualties have lower risk rate than healthy pre Aug 96. Allowing all post Aug 96 would represent lower risk than all healthy cattle excluding all casualties.
Faculty of Veterinary Medicine, Glasgow University	<p>Protocol should be worked out for boning cattle only in specially designated cutting premises under MHS supervision, preventing SRM and DRG from entering food supply.</p> <p>Although not unanimous, thought all casualties should be kept out of food supply and used for disease surveillance. This would prevent highest risk animals entering food supply and link to general need for disease surveillance. This could be achieved through the Animal Health &amp; Welfare Strategy. General concern for welfare of these animals, especially while market settled but casualty removal scheme would be beneficial.</p>
Food Commission (FC)	Extend list of SRM, particularly for older animals as suggested by German research.
Grazing Animals Project (GAP) JM<wisebarin@yahoo.co.uk>	See no problem in excluding fallen stock since this is already being done. Continuation of OTMS compensation would help especially as fallen stock can no longer be buried on farm. Agrees good idea.

Livestock and Meat Commission for NI (LMC)	Supportive of any investigative work that would result in opportunities to refine and improve the controls relating to beef safety.	Difficult debate. Cost of measure not adequately disclosed and difficult to apply same value criteria used for other measures. Clear that incidence of BSE +ves in casualty cattle significantly higher than for other cattle populations and risk assessment pointing to higher human health risk though risk remains low. Therefore, no basis on which to disagree recommendation.
Meat and Livestock Commission (MLC)	Support research.	Agree higher risk groups should be excluded.
National Consumer Council (NCC)		Support recommendation that OTM casualties should be excluded from food supply.
National Farmers Union (NFU)	Agree it would be desirable to make this assessment and for a protocol to be established, if appropriate.	Risk assessment indicates significantly higher risk though still low in absolute terms. Workable definitions and procedures would have to be established if certain categories of casualties were not to be allowed. Do not feel competent to give a definitive judgement - this should be a food safety decision based on sound scientific advice. If recommended by FSA would want to be satisfied about the operation and funding of arrangements for OTM casualties.
NFU Scotland		Requires clarity in definition of casualty animals. In many cases meat will be perfectly fit for human consumption. If excluded, compensation payment must be made.
NIMEA	Would accept further investigation may be useful PR research. Little point on one hand saying test -ve and then still considered doubtful because of the drg. Animal is either acceptable or not on basis of test.	While casualties may be highest risk category because they are usually older cattle, they should be dealt with under normal Fresh Meat Hygiene Regulations. If otherwise eligible for the food supply and if over 30 months and BSE test -ve, they should be allowed into food supply.

Quality Meat Scotland (QMS)	Investigation should include both drg and vertebral column but would like FSA to explain why if animal passes BSE test there should be a question.	Agree should continue to be excluded from the food supply.
Royal School of Veterinary Studies, Edinburgh University (RSVS - E)		Support continuation of OTMS for casualty cows most particularly because sudden release of OTM rule for all cattle would generate marketing problems due to lack of demand.
SAC Veterinary Services, Perth		Should be excluded but subject to veterinary assessment/clinical diagnoses and comprehensive post mortem examination.
Sainsbury's Supermarkets Ltd	Accept suggestions	Accept suggestions
Scottish Association of Meat Wholesalers (SAMW)	Query proposal if only test negative allowed into food supply and would like to understand this more fully.	Taking account of relative risk, should be excluded.
Scottish Federation of Meat Traders' Associations (SFMTA)	Support investigation to assess potential for drg to remain in meat.	Taking account unquantifiable risk from OTM casualties and because slaughtered on farm, they should not be allowed into food supply.
Scottish Food Advisory Committee (SFAC)	Endorse view that FSA should assess potential for DRG to remain in meat and develop a protocol. Agency should develop a strategy in case DRG were found in meat following vc removal.	Separation of two different cases. All those killed or die on farm (OTM & UTM) should not be allowed into food supply; those identified as casualties in a lairage should be subject to inspection to determine whether they should be allowed into food supply.
Soil Association		No problem with not allowing OTM casualty stock into food supply.
Somerfield Stores Ltd		Appropriate to exclude as a precaution. There can be no argument about potential BSE infection if these animals are banned.
State Veterinary Officer, Jersey		Already exclude OTM casualties and would support continuation.

Risk Redn

The Co-operative Group	Concerned that the description of risk reduction tends to imply that the risk is measurable and greater than small. This will undermine public confidence in a very sensitive and emotional issue. Mixed views about drg. Believe there is a need to review mechanisms for vc removal and look at new technologies which can deliver thoroughness required.	Would like to see casualty cattle excluded.
The Highland Council	Support study.	Any scheme must allow for slaughter on farm. Little evidence to suggest casualty OTM cattle should be excluded.
UK Association of Frozen Food Producers (UKAFFP)	Agree if significant risk of residual infectivity - should be done in co-operation with EFSA to ensure consistent recommendation across all member states.	Puzzled by the assumption but would not disagree if extra precaution were to enhance public acceptance.
Ulster Farmers' Union (UFU)	Agree investigation should be conducted and protocol established if necessary.	Concerns that a properly resourced scheme must remain in place if the decision taken to continue their exclusion.
Veterinary Public Health Association (VPHA)	Difficult to determine if DRG removed. Whole area may require detailed research before a practical protocol can be developed. Important to ask if MHS have ability to provide level of supervision required.	Many reasons including drug residues and welfare as to why OTM casualties should be excluded. Believe public perception would be that this recommendation should be fully endorsed. Arguments on cost and disposal would have to be gone through. Concern about the definition of casualties and the way certification dealt with. Sch 18 & 19 system depends on farmer deciding and they may not be the best person to make the decision.

**OTM RULE REVIEW: CORE STAKEHOLDER GROUP REPORT  
CONSULTATION RESPONSES**

PARTIAL REGULATORY IMPACT ASSESSMENT

Company/Organisation	RIA	Imports
British Institute of Agricultural Consultants (BIAC)	<p>Important to recognise market pressures &amp; effect of CAP reform. Change could amount to 250k tonnes carcass weight a year, demand currently supplied by imports of 300k tonnes in 2002: releasing OTM beef would have considerable effect on that trade. Effect may not be as dramatic as some suppose. Culling likely to remain high for rest of 2003 with fewer cull cows early 2004 when market adjusting. Cow beef will come onto market gradually; market been closed for so long will take some time to re-establish. Anecdotal evidence suggests former trade with France can be re-established: facilitated if UK re-classified "moderate risk" status. RoI has diverted exports from other countries to the UK - they will probably adapt quickly to reduction in UK export market. British plants will be glad to have cow beef available to supply huge market for mince - nearly 500k tonnes carcass weight.</p>	<p>Important no risk discrepancy between imported and home produced beef: not always been the case in the past.</p>
British Leather Confederation (BLC)	<p>Contribute £100-120 million towards OTMS cost</p>	
British Meat Federation (BMF)	<p>Industry costs - conducting tests in abattoirs [sampling], packaging and transport; separation and retention of carcasses, hides, blood and offals pending test results - important costs kept to a minimum.</p>	
Comhairle nan Eilean Siar	<p>Extra costs associated with testing.</p>	

RIA+Imports

Farmers For Action (FfA)		Hope FSA takes close look at any changes. Imports growing - never been a greater need for policing and regulation of this product to ensure it comes up to the standard UK producers are expected to adhere to.
Farmers Union of Wales (FUW)	Quote MLC figures on additional supply.	
General Consumer Council, Northern Ireland (GCCNI)		Any revisions should apply equally to imports from both EU and non-EU countries.
Meat and Livestock Commission (MLC)	Provide detailed analyses of projected cattle numbers/tonnes for various options, market impact and import displacement.	Strongly endorse statement that there should be no unacceptable discrepancy
National Council of Women of Great Britain (NCW)		Whole situation of imported meat (not just from Ireland) and its controls cannot be isolated and must be looked at in parallel.
National Farmers Union (NFU)		Agree there should be no unacceptable discrepancy.
NFU Scotland (NFUS)	<p>Justifying the cost of unwinding the rule on the basis of cost takes no account of transfer of those costs back to industry and ultimately back to primary producers. Would support more accurate assessment of costs to be conducted.</p> <p>1996 option would increase domestic production by 155k tonnes in 2004 and all cattle by 226k tonnes. 96 option may generate 55k tonnes or more UK beef - 8% current production for which retail, service, processing and manufacturing sectors have no requirement. Only UK markets can be considered for short term until DBES unwound or removed. Would result in severe price volatility. 224k tonnes cow beef produced in 1995, vast majority was exported helping to balance supply and demand.</p>	Concerned and disappointed risk assessment on RoI imports has not been presented to stakeholders. Fully support Core Stakeholder Group position that there should be no unacceptable discrepancy in risk.

NIMEA	It is assumed that whatever change to OTM rule is applied automatically to imports. It must be established that imported beef must be exactly same BSE tested status. Any testing regime being implemented in any other member state must have its equivalence to the UK scheme declared. Playing field must be level.
PRS & EB Scott, Moorland Farm	Concern about cost of test and who will pay. FSA indicated cost could be as much as £500 per head which is more than the animal is worth. Given that other agencies, not farmers are responsible for BSE, inappropriate for cattle keeper to bear the cost of the test. BSE test was introduced for surveillance purposes, rather than a public health measure. Insist farmer should not be burdened with cost.
Quality Meat Scotland (QMS)	Must be more accurate assessment of industry costs before final decisions taken. QMS provide some analysis of potential market and consumption patterns. Agrees there should be no discrepancy. Risk assessment must be published before decision taken.
Scottish Association of Meat Wholesalers (SAMW)	Disappointed not yet seen RoI risk assessment. In likelihood will have to accept OTM imports, consumers must have confidence in imported meat overall. Further risk assessment on EU basis would reassure European consumers on safety of British beef and reassure our consumers on safety of imports. Little information about abattoir costs as protocols have not been confirmed.
Scottish Federation of Meat Traders' Associations (SFMTA)	Cost of testing and costs associated with +ve test results have not been made clear to industry. Unclear who carries the burden of costs (including destruction of adjacent carcasses - farmer or purchaser? Accurate cost studies should be undertaken.
Scottish Food Advisory Committee (SFAC)	Agree that imported beef should in general be treated on an equal basis to domestically produced beef.

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Somerfield Stores Ltd	Companies wishing to trade in OTM will meet appropriate costs of implementing changes, value of animal likely to decrease significantly from current payment. May need to consider whether transition arrangements would be appropriate, especially given current overall lack of profitability in the milk industry.
The Highland Council	Agree there should not be an unacceptable discrepancy and welcome view that changes will also apply to imports. Would like further information about how this would be implemented.
UK Association of Frozen Food Producers (UKAFFP)	Engaged in discussions with Defra on marketing potential and effect of changes. Unable to assess economic impact without further consideration.
Ulster Farmers' Union (UFU)	Desire to see an equal treatment of risk applying to imported OTM beef as to domestically produced product.

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