

SUMMARY OF RESPONSES TO RURAL AFFAIRS DEPARTMENTS' CONSULTATIONS OF OCTOBER 2005 ON THE HARMONISATION OF SPECIFIED RISK MATERIAL (SRM) CONTROLS APPLICABLE IN THE UK WITH THOSE IN OTHER MEMBER STATES

1. Background

This paper summarises responses received to the Rural Affairs departments' formal consultations launched in October 2005 on SRM controls harmonisation across the EU and on the re-introduction of the harvesting of head meat.

65 responses were received, 7 of which did not address policy areas led by the FSA. 2 asked for their responses to be treated on a confidential basis.

2. Executive Summary

Derogation to remove SRM vertebral column in butchers' premises

There was strong support for taking up the derogation to permit the removal of SRM vertebral column in butchers' premises. The strongest support came from the industry sector, principally on the basis that butchers would be able to continue offering a premium product produced from traditional beef, hung and matured on the bone and craft butchered.

This was also supported from a welfare and several land management organisations as they considered it more likely that farmers would continue to keep slow maturing grass fed cattle rather than moving to more intensive rearing practices with the consequent welfare and environmental impacts.

Enforcement

Several industry respondents supported local authority enforcement at butchers whilst a consumer stakeholder considered that MHS enforcement was preferable given the level of local authority resources in rural areas. Another consumer stakeholder expressed concern whether controls could effectively be enforced in butchers' shops given the prevailing opinion that the measure was not necessary to protect public health and that customers would want to buy products with bone in. An industry stakeholder expressed concern about enforcement costs. There were also concerns about the costs of SRM disposals from butchers' shops and worries about the practical problems of staining and dealing with category 1 animal by-products generally.

Head meat

Consumer organisations expressed concerns over proposed changes, industry stakeholders generally supported a change.

3. Responses

England

AB & FE Wood
Association of Independent Meat Suppliers
British Cattle Veterinary Association
British Meat Processors Association
British Veterinary Association
CFG Foodware
Compassion in World Farming
Co-operative Group
Country Land and Business Association
CS Morphet & Sons Ltd
David Taylor MP
Deane Veterinary Centre
English Nature
Food and Drink Federation
G & V Matravers
Grazing Animals Project
JG Pears Ltd
Limestone Country Project
Livestock Auctioneers Association
Meat & Livestock Commission
N TN & EM Baskeyfield
National Beef Association
NFU
National Federation of Meat and Food Traders
Pet Food Manufacturers Association
Peter Jones Livestock Ltd
PRS & EB Scott
R&P Baker
Rare Breeds Survival Trust
SG Harrison & Son
Soil Association
Sudbury Common Lands Charity
Traditional Breeds Meat Marketing Co Ltd
Traditional Hereford Breeders Club
UKRA Technical Committee
Which?
Yorkshire Dales National Park Authority

Scotland

Advocates for Animals
British Society of Animal Science
British Veterinary Association (Scottish Branch)
Devro (Scotland) Ltd
East Ayrshire Council
John J Robinson

NFU Scotland
 Quality Meat Scotland
 Royal Environmental Health Institute of Scotland
 Scottish Agricultural College
 Scottish Association of Meat Wholesalers
 Scottish Federation of Meat Traders Associations
 SEPA
 Scottish Rural Property and Business Association

Wales

Cyngor Gwynedd Council
 Farmers Union of Wales
 Graig Farm Organics
 Hybu Cig Cymru (Meat Promotion Wales)
 NFU (Cymru)
 Penrhiw Farm
 Welsh Agri-Food Partnership Organic Strategy Group
 Welsh Black Cattle Society

Northern Ireland

Nimea Ltd
 Northern Ireland Master Butchers Association
 The Livestock and Meat Commission (NI)
 Ulster Farmers Union

4. Summaries of responses

Organisation	Summary of comments
England	
AB & FE Wood	View proposed change as a backward move. Questions inclusion of buffalo in BSE controls. Support for derogation to remove SRM VC in butchers' premises.
Association of Independent Meat Suppliers	Despondent about reduction from 30 to 24 months in the age at which bovine VC becomes SRM. Support for derogation to remove SRM VC in butchers' premises. Removal of head meat should be permitted in abattoirs and cutting plants.
British Cattle Veterinary Association	Support butchers' shop derogation but robust enforcement system required. Broadly support not permitting harvesting of head meat in cutting

	plants.
British Meat Processors Association (BMPA)	Support for derogation to remove SRM VC in butchers' premises. Supports flexibility of moving cattle heads to off-site cutting or boning plants for meat recovery. Careful consideration required of enforcement issues.
British Veterinary Association	UK BSE regulations should be harmonised across the EU. Strong support for butchers' shops derogation. Exercise caution over removal of head meat in cutting plants.
CFG Foodware	Support for derogation to remove SRM VC in butchers' premises. Concerns over enforcement arrangements. Fears local authorities will have insufficient resources. Oppose harvesting of head meat in cutting plants.
Compassion in World Farming	Concern at reduction from 30 to 24 months in the age at which bovine VC becomes SRM. Support for derogation to remove SRM VC in butchers' premises.
Co-operative Group	VC should continue to be removed at cutting plants. Minimises risks of cross-contamination during transportation. Restricting operations to as few sites as possible provides for better waste management. Unsure of market potential for head meat. Query removal of trigeminal ganglia, thymus and spleen from SRM classification.
Country Land and Business Association	General support for taking up of available derogations. Support head meat harvesting in cutting plants. Concerns over possible SRM enforcement costs to small businesses.
CS Morphet and Sons Ltd	Despondent about reduction from 30 to 24 months in the age at which bovine VC becomes SRM. Support for derogation to remove SRM VC in butchers' premises. Removal of head meat should be

	permitted cutting plants.
David Taylor MP	Support for constituents concerns (see entry for G & V Matravers below)
Deane Veterinary Centre	Opposes harmonisation proposals on grounds including cost and animal welfare. Proposals will compromise future of traditional herds.
English Nature	Concern on impact on extensive cattle rearing. Oppose reduction from 30 to 24 months in the age at which bovine VC becomes SRM. Retain 30 months cut off for domestic market. Back up position - support for derogation to remove SRM VC in butchers' premises. Minimise enforcement costs by letting local authorities supervise systems at butchers' premises.
Food and Drink Federation	No comment on SRM issues.
G & V Matravers	Oppose reduction from 30 to 24 months in the age at which bovine VC becomes SRM. Proposals will compromise future of traditional herds.
Grazing Animals Project	Support derogation to remove SRM VC in butchers' premises. Support setting age at which bovine VC becomes SRM at a minimum of 30 months. Concerns over passing on enforcement costs to small businesses.
J G Pears Ltd	Observations on importance of safe storage and disposal of SRM.
Limestone Country	Additional burdens on butchers supplying bone-in cuts. Suggestion of extension of derogation to delay VC removal to post-hanging stage. Additional financial burdens.
Livestock Auctioneers Association	Support for taking up available derogations.
Meat and Livestock Commission	Support derogation to remove SRM VC in butchers' premises. Reservations on return to harvesting head meat. Strong recommendation that any head meat harvesting takes place in licensed, supervised premises.

N TN & EM Baskeyfield	Derogation to remove SRM VC in butchers' premises supported.
National Beef Association	Preferred position is maintenance of minimum 30 months cut off. Support taking up available derogations if 24 month cut off inevitable. Concerns over devaluation of meat from traditional herds. Welcome resumption of head meat trade.
NFU	30 months limit for bovine VC becoming SRM should remain. Support derogation to remove SRM VC from animals aged 24 to 30 months in butchers' premises.
National Federation of Meat and Food Traders	Support setting age at which bovine VC becomes SRM at 30 months or higher. Change to 24 months will impact adversely on UK butchers and smaller slaughterhouses. Change will cause confusion amongst consumers.
Pet Food Manufacturers Association	No comments on SRM issues.
Peter Jones Livestock Ltd	No comments on SRM issues.
PRS & EB Scott	Support derogation to remove SRM VC from animals aged 24 to 30 months in butchers' premises. Failure to secure derogation would have serious economic consequences for a business selling, direct to the customer, meat from traditionally and extensively reared cattle.
R & P Baker	Reduction of the age at which bovine VC becomes SRM would have a harmful effect on the business of selling, direct to the customer, meat from traditionally and extensively reared cattle.
Rare Breeds Survival Trust	The age at which bovine VC becomes SRM should be increased to 36 or 42 months for traditional breeds. Support derogation to remove SRM VC from animals aged 24 to 30 months in butchers' premises, while believing that the exemption does not go far enough. Any reduction in age limits will have

	<p>an adverse social impact. Small businesses should not be made to bear enforcement costs.</p>
SG Harrison & Son	<p>Concerned at reduction from 30 to 24 months in the age at which bovine VC becomes SRM. Proposals will harm producers of traditionally raised beef.</p>
Soil Association	<p>Unhappy at reduction from 30 to 24 months in the age at which bovine VC becomes SRM. Derogation to allow removal of SRM in butchers shops essential. "Butchers shops" to include on-farm butchereries. Butchers to operate under local authority supervision.</p>
Sudbury Common Lands Charity	<p>Unavailability of suitable licensed premises would compromise fattening of traditional breeds. Consequential detrimental effect on extensive grazing of conservation sites.</p>
Traditional Breeds Meat Marketing Co Ltd	<p>Proposals would have disproportionately adverse effect on market in traditional breeds. Differential marking proposed for the domestic market.</p>
Traditional Hereford Breeders Club	<p>Proposals would have disproportionately adverse effect on market in traditionally raised breeds. Propose for specialist UK herds a 36 month limit at which VC becomes SRM for domestic sales.</p>
UKRA Technical Committee	<p>Inappropriate to permit SRM VC removal in butchers' shops. Onerous for both operator and regulator. Use in butchers' shops of staining dye prescribed for SRM inconceivable.</p>
Which?	<p>Concerns over possible derogation to remove SRM VC in butchers' shops. Reasons for any change must be clearly communicated to consumers. Concerns over permitting harvesting of head meat due to possibilities of cross-contamination from other SRM. If allowed, head meat should be harvested in slaughterhouses.</p>
Yorkshire Dales National Park Authority	<p>Proposals will jeopardise farmers' ability to develop premium market. A</p>

	special derogation is proposed to permit VC removal in butchers' shops after hanging.
Scotland	
Advocates for Animals	Concern at implications of encouraging move away from keeping slow maturing grass fed cattle. Discuss with EU whether move to 24 months cut off is necessary. Make use of derogation to remove 24 to 30 months bovine VC in butchers' shops.
British Society of Animal Science	Strong plea to permit removal of head meat in authorised cutting plants. Plants have experience. Proximity to abattoirs minimises risks associated with transportation.
British Veterinary Association (Scottish Branch)	Proposed changes to SRM handling are accepted. Derogations must be strictly controlled in the interests of public safety. Removal of head meat and transport of unstained SRM needs to be heavily controlled.
Devro (Scotland) Ltd	Support classification of VC as SRM at 24 months. Uncertain about derogation to remove bovine SRM VC in butchers' shops. Support enforcement by MHS.
East Ayrshire Council	Removal of head meat exclusively in abattoirs will avoid risks associated with transporting SRM. Smaller abattoirs may not be able to maintain current processing volumes with a move to a 24 month cut off. Local authorities may not have sufficient staffing to enforce VC removals in butchers' shops.
John J Robinson	Expressed preference for not taking up derogations. Industry overburdened with enforcement costs. Innovation required to avoid past strategies which resulted in primary producers bearing additional costs.
NFU Scotland	Support harmonisation of SRM controls on VC but every effort should be made to return to 30 months (or older) as soon as possible. Take up available derogations.

Quality Meat Scotland	Proposals will create particular operational disturbances for craft butchers and farm shops. Smaller abattoirs may experience capacity problems. Derogation to remove SRM VC in butchers' shops therefore supported. Ability to recover head meat would meet recognised demand. Removal should be allowed in cutting plants. Risks associated with transportation of heads are minimal.
Royal Environmental Health Institute Scotland	No comment.
SAC	No comment on SRM issues.
Scottish Association of Meat Wholesalers	Support take up of derogation to remove 24 – 30 month SRM VC in butchers' shops. Make every effort to reinstate a 30 month limit. Welcome harvesting of head meat in cutting plants. No reason why heads cannot be transported to cutting plants. Reduction in list of SRM welcomed.
Scottish Federation of Meat Traders Associations	Head meat harvesting in cutting plants unlikely to generate considerable interest. Proposals will disadvantage slower maturing breeds. Butchers' shops should be allowed to remove 24 to 30 months VC. Shops should be exempt from the staining requirements of the TSE Regulations. The 24 month "rule" should be subject to review at the earliest opportunity.
SEPA	Changes to SRM controls will add to processing costs. This could result in negative localised environmental impacts.
Scottish Rural Property and Business Association	Recognises the consequential changes on SRM controls.
Wales	
Cyngor Gwynedd Council	Preferable for VC from 24 – 30 months animals to be removed at designated licensed premises. Unrealistic to rely on periodic local authority inspections for enforcement.
Farmers Union of Wales	Retain existing 30 month derogation for meat destined for the domestic

	<p>market. 24 month limit to apply to export market only.</p>
Graig Farm Organics	<p>Smaller quality-driven producers most affected by proposals. Slaughter of cattle aged less than 24 months impractical and financially unviable in many cases. Significant cost implications for smaller businesses. Proposals would seriously restrict consumer choice.</p>
Hybu Cig Cymru (Meat Promotion Wales)	<p>Removal of VC as SRM should be permitted in cutting plants and butchers' shops. Reservations about return to harvesting head meat since SRM controls have ensured that meat for human consumption derived from identifiable muscle meat.</p>
NFU (Cymru)	<p>Prefer continuation of 30 months cut off. Proposals will have an adverse impact on producers of extensively reared cattle, small abattoirs and craft butchers. Urge taking up of butchers shops derogations.</p>
Penrhiw Farm	<p>Concerned at reduction from 30 to 24 months in the age at which bovine VC becomes SRM since this will have adverse consequences for small organic farming businesses.</p>
Welsh Agri-Food Partnership Organic Strategy Group	<p>Favours amending legislation to make use of derogations as the best option for industry as a whole.</p>
Welsh Black Cattle Society	<p>Concern over implications of changes for beef producers.</p>
Northern Ireland	
Nimea Ltd	<p>No objection to the removal of bovine VC in butchers' shops. Introduction of harvesting of head meat essential. No sound reason why heads should not be transported to cutting plants. Welcomes reduced list of SRM.</p>
Northern Ireland Master Butchers Association	<p>Concerned at any proposal to prevent boning out of cattle aged over 24 months in butchers' shops. Will result</p>

	<p>in additional costs and reduction in quality. Could be confusing for consumers and damage industry. Consumers may turn to cheap imports.</p>
<p>The Livestock Meat Commission (NI)</p>	<p>Does not understand the rationale behind allowing SRM VC removal in butchers' shops for 24 to 30 month cattle only. Older cattle have to test negative for BSE before being allowed into the food chain. Controls should be harmonised throughout the EU.</p> <p>Derogation allowing removal of head meat in cutting plants should be adopted.</p>
<p>Ulster Farmers Union</p>	<p>Supports proposals to harmonise SRM controls. Supports taking up flexibilities where available in relation to: removal of VC SRM in butchers' shops; harvesting head meat; and declassification of some SRM.</p>