

CHAPTER 11.4.

BOVINE SPONGIFORM ENCEPHALOPATHY

Australian Comments – indicated in blue font

GENERAL COMMENT

Australia has concerns with some of the proposed amendments to the BSE chapter.

Australia suggests that the need to include atypical BSE requires further consideration. The risk of recycling and amplification of atypical BSE, considering the very low incidence and spontaneous occurrence, would be sufficiently mitigated through the effective implementation of a ruminant feed ban and effective surveillance.

New text under Article 11.4.2 requires that the risk assessment for BSE includes entry, exposure, and consequence assessments and risk estimation. The description of 'consequence assessment' in this chapter does not align with the principles of import risk analysis under chapter 2.1. Consequence assessment should evaluate the 'consequences' of cattle being infected with BSE rather than the 'likelihood'. Australia suggests redrafting this section so that it is consistent with the import risk analysis chapter.

The proposed surveillance requirements, as outlined in the new version of Article 11.4.18, do not sufficiently consider the consequences of ineffective control measures, such as the inadequate implementation of a ruminant feed ban. The consequences are significant and may not be realised for many years given the extended incubation period of BSE.

Australia is also concerned with the proposed changes to the safe commodity section (Article 11.4.1bis). The acceptance of gelatine and collagen derived from bones as a safe commodity is a significant change to the Terrestrial Code. Australia is not aware of sufficient evidence that the processing of gelatine or collagen from infected tissues can ensure the final product is free from TSE infectivity. Additionally, while all references in the rationale documents refer to gelatine, the ad hoc group appears to group collagen with gelatine. It is important that adequate consideration is given to the fact that collagen does not undergo the same level of processing as gelatine.

Australia suggests that the levels of risk reduction associated with specific processing parameters could be included in this chapter to provide additional guidance to Member Countries.