

Response from the

Welsh Agri-food Partnership Organic Strategy Group

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to the Welsh Assembly Government consultation on

**Transmissible Spongiform Encephalopathy (Wales)
Regulations 2002**

http://www.wales.gov.uk/subiagriculture/content/consultations/tse_letter-e.doc

The aim of this response is not to recommend amendments to the regulation, but to draw attention to the requirements already imposed on organic producers by organic standards, as defined by EU Regulation 1804/1999 and implemented by the UK Register of Organic Food Standards, and to identify issues that might need to be addressed as a result of the implementation of the TSE (Wales) Regulations.

Current requirements of organic producers

The UKROFS standards contain the following provisions relevant to TSEs:

- 3.1.2. All cohorts and offspring of BSE cases on units managed in accordance with these Standards must be removed.
- 3.1.3. Subject to paragraph 3.1.4, any bovine animal brought on to a unit managed in accordance with these Standards must:
 - have been born on or after 1 August 1996 and have been clearly identifiable throughout its life; and
 - have had all its movements recorded on the cattle passport system or computerized tracing system.
- 3.1.4 Except with the prior approval of the inspection body, no bovine animal may be brought on to a unit managed in accordance with these Standards unless there is evidence that no cases of BSE have been confirmed in the preceding six years on the holding to which the animal's herdmark relates.
- 4.14 Feed materials from animal origin (whether conventional or organically produced) can only be used if listed in these Standards (Chapter II C, Section 2), and subject to the quantitative restrictions imposed in these Standards.

Chapter II C, Section 2 *Feed materials from animal origin* specifies the following permitted feedstuffs:

- 2.1. Milk and milk products. The following materials are included in *this* category: Raw milk as defined in Article 2 of Directive 92/46/EEC, milk powder, skimmed milk, skimmed-milk powder, buttermilk, buttermilk powder, whey, whey powder, whey powder low in sugar, whey protein powder (extracted by physical treatment), casein powder and lactose powder.
- 2.2. Fish, other marine animals their products and by-products. The following materials are included in this category: Fish, fish oil and cod-liver oil not refined; Fish molluscan or crustacean autolysates, hydrolysate and proteolysates obtained by an enzyme action, whether or not in soluble form, solely provided to young animals. Fish meal.

Conclusions and recommendations:

1. There appears to be no direct conflict between the proposed regulations and organic standards, although the situation with respect to the feeding of fish, other marine animals, their products and by-products to ruminants under organic standards may need clarifying.
2. The need for registration of premises where feedstuffs containing fish meal etc. are used will be an issue on organic holdings with both ruminant and non-ruminant livestock.
3. In the light of organic standards requirements on the origin of livestock, the long standing restrictions on sourcing of feedstuffs, and the extensive use of traditional breeds, the 30-month rule with respect to organic cattle production needs to be reviewed with a view to including organic cattle within the beef assurance scheme to allow sale of animals up to 42 months old.
4. No specific issues relating to slaughter, processing, transport etc. were identified in consultation with processors that have not already been addressed previously by the industry.