

FILE



Ref: BSECosme

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Dr R Singh

From: Dr H Pickles
Med ISD/3

Date: 29 January 1990

Copy: Mr Love MCA

Copy: Mr J Maslin MAFF

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USE OF BOVINE OFFAL IN COSMETICS: BSE

1. We spoke about your draft letter to Mr Roscoe at DTI.
2. I feel uneasy about permitting use of bovine offal from British calves under 6 months. If there is a guarantee that any material derived from this is to be applied to intact skin only, then the hazard is so very remote it could be ignored. But I sense difficulties in (1) being sure material will only be applied to intact skin (2) policing removal of these offal from only animals under 6 months and (3) consequent avoidable dangers to workers in the cosmetic industry. We agreed that food consumption presents no problem in animals from this age group because:
 - (i) no animals that age will have been fed contaminated meal
 - (ii) the experts believe it unlikely vertical transmission will take place anyway
 - (iii) consumption of offal from animals that young is trivial, and the practical difficulties in not excluding them too great
 - (iv) even if vertical transmission were possible, by 6 months of age there would not be detectable infection (by ic mouse inoculation) in any organ in any case, if experience with natural scrapie is anything to go by.
3. But I think application to broken skin is getting rather close to parenteral administration. Together with problems of policing the 6 month limit, and the fact that the "benefit" from such material is so dubious, I would prefer to see a complete ban. However, if as you suggest this 6 month limit has already been agreed in Europe, I will not rock the boat if you want to leave this alone for now, and I am sure MAFF would prefer this to be the case because of their current problems with BSE in Europe.

4. As agreed, I also enclose a copy of my briefing note on BSE. Items I would question in your own note are:

a. the suggestion Southwood/Tyrrell reached different conclusions on the chance of transmission to man is not correct.

b. nor is the comment on Southwood's view on this, nor the evidence supposedly in support of intraspecies transmission, worded appropriately.

c. the transmission between species list is incomplete and not directly relevant: there has to be careful description of doses, agent involved (whether natural or multiply passaged, for example) etc. 205

d. the CJD incubation period can be under 2 years (shortest time in iatrogenic case) to more than 30.

e. the relative "dose" of agent in various organs depends on the stage of the disease eg in natural scrapie in sheep lymphoid tissue has high concentrations early, and brain late.

5. I enclose copies of the Southwood report (to pass on to DTI) and of Tyrrell (for your scientific colleagues). This latter is in the prepublication version which is identical apart from front cover to the final form, but I am running low on these.



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