

A. J. 158.

«DATA Charmaine's HD:BSE - AUGUST 95:fill in bse position paper spec»
FROM THE DIRECTOR GENERAL

24 August, 1995

STRICTLY PRIVATE AND CONFIDENTIAL

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Dear «salutation»

UKASTA POLICY ON BSE

At the President's suggestion in the light of recent events, I have reviewed the history of our policy on BSE so as to ensure that it fully reflects the needs of our supporters in the feed industry.

The paper enclosed with this letter is the result. For obvious reasons, this is being circulated only to an extremely small circle within UKASTA - basically, the National Executive Council.

If you have any comments on the policy, or the paper, I should be glad to receive them under Private & Confidential cover.

Yours sincerely,

J.W. REED

JWR/cg

copied to SMT members - LJD; JN; JAS; REW

95/8.24/2.1



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**UKASTA INTERNAL POSITION STATEMENT
BOVINE SPONGIFORM ENCEPHALOPATHY**

POLICY AIMS

1. These have been consistent, although unstated except in FEC discussions, since at least 1989:-
 - To minimise the risk of farmers' claims for compensation from feed compounders.
 - To minimise the potential damage to compound feed markets through adverse publicity.
 - To maximise freedom of action for feed compounders, notably by maintaining the availability of meat and bone meal as a raw material in animal feeds, and ensuring time is available to make any changes which may be required.

STRATEGY ADOPTED/SUCCESS ACHIEVED

2. Strategy has depended upon the situation at a particular time. UKASTA has sought to anticipate criticism from other industry sectors and action by Government/Brussels as the epidemic has developed and knowledge of the disease increased. Through close liaison with MAFF, we have to date avoided public statements seriously damaging to the feed industry and the adoption of policies likely to lead to such damage.
3. Successful examples of this strategy include:
 - "Voluntary Ban" on SBO's in all MBM purchase contracts from November 1989, matching the Government ban on SBO'S in human food but anticipating the statutory ban on SBO's in feed which came in only from September 1990;
 - Pressing Government for full compensation to farmers, which was finally conceded in February 1990;
 - evidence (not just on BSE) to the Lamming Committee in 1991/92 resulted in their recommending tighter controls over home mixers/integrated operations, and over the processing of fallen animals. Government eventually tightened the fallen animals legislation in December 1992. Other Lamming recommendations could yet be useful to us.

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95/8.24/2.2

- UKASTA pressure dissuaded MAFF from publicly linking voluntary ELISA tests of feed on farms with BAB's to (possibly compulsory) tests at compounders' premises in June/July 1994;
- in August 1995, while tightening the SBO Order and responding to the EU Decision requiring introduction of a testing programme, MAFF has accepted UKASTA proposals for the presentation of the changes to a wider audience, including farmers, and accepted our help in preparing for an EU Commission visit to inspect procedures and controls.

THE FUTURE

4. BSE has for more than seven years posed the greatest single potential threat to feed compounders' profitability. Although the epidemic is in sharp decline (275 cases per week compared to 1000 at the peak), MAFF remains under pressure in Brussels and is not skilled at handling potentially explosive issues.
5. Tests may show that ruminant feeds have been sold which contain illegal traces of ruminant protein. More likely, a few positive test results will turn up but proof that a particular feed mill knowingly supplied it to a particular farm will be difficult if not impossible.
6. The threat remains real and it will be some years before feed compounders are free of it. The longer we can avoid any direct linkage between feed milling practices and actual BSE cases, the more likely it is that serious damage can be avoided. In issue management terms, the aims and the strategy remain valid, but must be kept under review in the light of further events.

JWR/cg/23.8.95