

14 /2 /2010

The Hon.Fioana Nash M.P.  
The Chairperson  
The Hon. Senator Bill Heffernan  
The Hon.Senator Chris Back  
c/- Ms Trish Carling and Ms Janette Radcliffe  
Rural and Regional Affairs and Transport References Committee  
The Senate  
Parliament House  
Canberra A.C.T. 2601

Dear Senators ,Trish and Janette.

Please find enclosed my letter of the 13<sup>th</sup> February 2010, to Dr. Andy Carroll, the Chief Veterinary Surgeon of Australia, the Department of Agriculture ,Fisheries and Forestry.

Unfortunately there has been very little veterinary information forwarded about the possible need to change animal feeding practices within Australia ,when the new BSE policy commences. I would like to ask if this letter to Dr.Andy Carroll could be admitted to my Senate Hearing submissions of the 5<sup>th</sup> February 2010 .

This letter more clearly sets out veterinary questions on these animal feeding issues which exist, at present in Australia and which may need to be changed.

The questions asked of Dr.Carroll, explore these issues.

My previous submissions to the Senate Hearings have become increasing convoluted as to be almost unreadable.

This letter more succinctly asks some veterinary questions to DAFF about the changes of risks in animal husbandry feeding practices within Australia , when the new BSE policy commences.

Possible changes may not be welcomed by, say, pet and pig food manufacturers.

It is believed that the Government will try to avoid changes which will upset these powerful interests.

Kind Regards

  
Robert Steel

13<sup>th</sup> February 2010

Dr. Andy Carroll,  
Chief Veterinary Officer, Australia  
Department of Agriculture, Fisheries and Forestry  
GPO Box 858 Canberra ,ACT 2601

Dear Dr. Carroll,

Thank you for your letter of the 3<sup>rd</sup> February 2010, on behalf of the Minister, the Hon. Tony Burke M.P., following on from my letter to him of the 29<sup>th</sup> December 2009.

Please advise that the Department is aware that ruminant derived Meat and Bone Meals ( MBMs) and Specific Risk Materials for BSE (SRMs) do now enter the human food chain in Australia via the feeding of these ruminant MBMs and SRMs( for BSE) to pigs, in and by their accordingly identified and labelled MBMs and SRMs containing pig foods.

Of course it is stated on the labelling of pig foods in Australia, that these pig foods contain ruminant MBMs and SRMs and that these pig foods must not be fed to cattle.

Please advise why your Department considers that there is no risk at all, under the new BSE Policy to Australian Agriculture or public health, in the future, from these continuing feeding practices of feeding ruminant MBMs and SRMs to pigs in Australia.

If you cannot advise on this, would you please contact the Department of Health and Ageing via FSANZ for their expert advice and refer this information directly to me from your Department?

Obviously it is important to obtain this advice from DAFF itself as you, Dr. Carroll, are fully aware that skeletal muscles with their associated fatty tissues, lymphatic and peripheral neuronal tissues in these beef meats, will be coming into Australia under the new Policy for BSE from countries with endemic BSE in their cattle. Please advise that you are aware that if there is any OIE advice given to these countries, to disclose the progress or results of rapid testing for BSE in their cattle herds or even the total number of BSE affected cattle detected either by active or passive surveillance,

Please confirm that you are fully aware that these muscle tissues, as described above, have been shown to contain misfolded prions, PrP<sup>Sc</sup> ie PrP<sup>bse</sup>, if a beast is infected with BSE.

Such a beast may be almost certainly clinically normal at presentation to you, the overseas veterinary inspector, may be completely unidentified by any trace back

scheme and may arrive for your veterinary inspection at an overseas abattoir with an official statement that it does not come from a cohort of BSE cattle in that country.

Is that safe for Australian Agriculture? Please answer this question.

Please address this question as a veterinary surgeon and leave FSANZ to answer the questions asked of it about human health and about its soon declared categorisations' criterions.

We will all find out on the 1<sup>st</sup> March what FSANZ criterions will be, for their categorisation of applicants for import licences .

Please advise that you are also fully aware that the future imported muscle tissues may enter the human food chain, indirectly .by feeding residues of these imported skeletal muscle tissues to pigs.

Please provide me with your own advice on this as a veterinary surgeon.

The Federal Government can no longer state, as you have in your letter to me of the 3<sup>rd</sup> February 2010 , that :-

“ There is no plausible way this non-contagious disease(BSE) could be transmitted to Australian cattle via safe imported beef”

Beef muscle tissues that you describe as “safe imported beef” are not safe if they come from an unidentified BSE infected animal containing PrP<sup>sc</sup> which can be shown to contain PrP<sup>sc</sup> by the emergent technology of serial protein misfolded cyclic amplification- SPMCA .

With the Government's new BSE policy, due to start on the 1<sup>st</sup> March 2010, we, as veterinarians are aware that BSE prions of cattle (PrP<sup>sc</sup>) did transmit to transgenic mice programmed with PrP pig, but these mice were more susceptible after passage of these PrP<sup>sc</sup> through sheep .

That indicates that there was amplification of the misfolded prions of BSE in these mice following prior passage transmission through sheep.

Please confirm that this scientific experiment is in no way related to, or important to, possible dangers to Australian Agriculture or to humans in the future .

As you know, mice transmission experiments resulted in BSE being found to be the aetiological agent of v CJD .

Please confirm that under the new policy for BSE ,there will be no added danger to pet animals such as cats and that this feeding practice should continue under the new policy for BSE for both pet animals and for poultry.

You and I, as veterinarians, are aware that natural infection of cattle with CWD or Scrapie has not, as yet, been identified.

Please advise that you are aware that intra-cerebral inoculation(I/C) of cattle with the CWD rogue prions or with the Scrapie rogue prions, have resulted in experimental infection and death from both of these diseases.

Please advise that you are aware that:-

In Scrapie I/C inoculations ,all cattle died more quickly than they do with BSE on second passage, at 14-18 months of age.

In CWD I/C inoculations ,all cattle were infected and developed clinical disease in 16.5 months of age on second passage. Again death was quicker than is usual in cattle with BSE.

This is the “ science on the crossover”—inter-species experimental transmission science

Please advise why you stated at the Senate Hearing on the 5<sup>th</sup> February 2010,Page 84, that:-

“ there was no science on the crossover of the wasting disease from deer.”

Please advise why you stated that there was no science.

Please note that the question asked of you did not refer to natural infection of cattle with CWD but to the “science of crossover”---the transmissibility of wasting disease of deer.

Please advise why you describe BSE as a non-contagious disease as you have in your letter to me of the 3<sup>rd</sup> February 2010.

It is correct that infectivity is not the usual transmission pathway for BSE but BSE has all three ecological transmission pathways confirmed - spontaneous , heritable and infective.

For example infection of calves occurs by drinking milk from BSE cows with classical BSE and from cows with atypical L and D strains of BSE secreting PrP<sup>bse</sup> in their milk.

Please advise whether you believe this infectivity of BSE to be an unimportant and an isolated anomalous scientific finding for Australian Agriculture ,when referred to the new BSE policy, when it has commenced.

I apologise for the multiplicity of questions asked of you but the veterinary side of the new policy has not yet been addressed properly by the veterinary profession.

It is hoped that you will reply as soon as possible as these questions are vitally important issues for Australian Agriculture.

The FSANZ decisions on it's criterions will be available on the 1<sup>st</sup> March 2010 and are peripheral to the questions asked of you.

Yours Sincerely



Robert Steel B.V.Sc. M.R.C.V.S



Australian Government

Department of Agriculture, Fisheries and Forestry

Dr Bob Steel  
Honorary Veterinary Surgeon NSW

Dear Dr Steel

Thank you for your correspondence of 29 December 2009 to the Hon. Tony Burke MP, Minister for Agriculture, Fisheries and Forestry, about the Australian Government's announcement to change the imported beef policy on bovine spongiform encephalopathy (BSE). Minister Burke has asked me to reply on his behalf. I regret the delay in responding.

You have sought clarification of the statement, 'If there was a case of BSE in Tasmania, then all Australian beef would be banned from the shelves in Australia'. The World Trade Organisation (WTO) *Agreement on the Application of Sanitary and Phytosanitary Measures (SPS Agreement)* provides international rules for trade among WTO members. One of the rules is that SPS measures applied by WTO members to imported agricultural products must be scientifically justifiable and applied in a non-discriminatory manner. In other words, imported product and domestic product must be treated in the same way.

Until now, consistent with our WTO obligations, if there had been a case of BSE in any one part of Australia, we would have had to remove all Australian beef from butcher and supermarket shelves—which may have also led to importing markets closing the trade, affecting a multi-billion dollar export industry that employs thousands of people across rural and regional Australia. The new policy provides for a better outcome for both our domestic and export industry as it allows a more sensible risk-based regional response to be made.

The government's new policy will not affect Australia's animal health status as a 'negligible BSE risk' country. Current BSE-related import conditions for live cattle remain unaltered. There is no plausible way this non-contagious disease could be transmitted to Australian cattle via safe imported beef. Australian governments have existing BSE-related regulatory controls—that, inter alia, prohibit feeding cattle and other ruminants with meat and bone meal—which serve to protect Australia's internationally recognised 'negligible BSE risk' status.

The other matters you raised are similar to those I addressed in my letter to you of 20 January 2010, or they have been dealt with in other correspondence to you.

Thank you for bringing your concerns to the minister's attention. I trust this information is of assistance.

Yours sincerely

Andy Carroll  
Chief veterinary Officer (Australia)  
Delegate to the OIE (Australia)

3 February 2010