

**ADVISORY COMMITTEE ON THE MICROBIOLOGICAL SAFETY OF
FOOD'S DRAFT REPORT ON BOTULISM IN SHEEP AND GOATS**

**SUMMARY REPORT OF RESPONSES TO CONSULTATION
FROM STAKEHOLDERS**

1. The Advisory Committee on the Microbiological Safety of Food's (ACMSF) draft Report on botulism in sheep and goats consultation was issued on 29 July 2008 and closed on 20 October 2008. The purpose of this consultation was to seek stakeholders views and comments on this report on botulism in sheep and goats. This report was produced by ACMSF in response to a request from the Food Standards Agency (FSA) for advice on the potential risk to human health from food chain issues linked to botulism or suspected botulism in sheep and goats. Specially, whether the recommendation from the ACMSF Botulism in Cattle Report¹ that there should be no requirement to restrict milk and meat from healthy cattle from farms where there have been suspected cases of botulism could also be applied to meat and milk from healthy sheep and goats on farms where there have been suspected cases of botulism.
2. The ACMSF provides the FSA with independent expert advice. This helps the Agency ensure that policy development and consumer advice in relation to the microbiological safety of food are based upon sound science and relevant practical experience and expertise. The consultation was issued to over 190 interested parties.
3. The key ACMSF recommendations are:
 - In the absence of other signs, there should be no requirement to restrict meat or milk from healthy sheep or goats from farms where there have been suspected cases of botulism.
 - The incidence of toxin types other than C and D among sheep and goats should be monitored and the situation should be reviewed if there is evidence for the types associated with human disease.
 - UK agriculture departments should reinforce their advice to farmers involved in the production, storage and spreading of poultry litter on measures for the prevention of on-farm botulism and the FSA should work closely with the poultry industry and enforcement bodies to ensure good practice in litter management and disposal, while recognising that practical solutions will need to take into account local

¹ Advisory Committee on the Microbiological Safety of Food (2006) Report on Botulism in Cattle. Published by the Food Standards Agency, FSA/1112/1206.

factors such as availability of arable land or other means of disposal of litter. This advice should be extended to sheep and goat farmers.

- UK veterinary authorities should continue to encourage sheep and goat farmers to report suspected cases of botulism.
4. The ACMSF is grateful to those stakeholders who responded and sets out in the table below its responses.
 5. The ACMSF's considered responses to stakeholders' comments are given in the last column of the table.
 6. A list of stakeholders who responded can be found at the end of the document.

SUMMARY OF SUBSTANTIVE COMMENTS TO THE ACMSF CONSULTATION – ADVISORY COMMITTEE ON THE MICROBIOLOGICAL SAFETY OF FOOD’S DRAFT REPORT ON BOTULISM IN SHEEP AND GOATS

Report Reference	Respondent	Comment	Response
<p align="center">General comments</p>	<p>Prof. Dr. Helge Boehnel [responded email]</p>	<p>Unfortunately, the scientific community does not yet consider chronic botulism as existant. With more than thousand farms affected in Germany, the risk of infected cows being sick is high. The same applies to poultry litter, containing C. botulinum even without carcasses. As we found chronic diseases now in cattle, horses, man, lama, sheep the whole epidemiology of botulinum toxicoses have to be rewritten.</p> <p>Even if the committee is British, European participants working in this field (thereare only very few) could have been invited as guests.</p>	<p>Noted.</p>
<p>General comments</p>	<p>Farmers’ Union of Wales [responded email]</p>	<p>The above report was circulated among the Farmers’ Union of Wales’ twelve County Branches, and their responses have been taken into full account below.</p> <p>The FUW believes that the recommendations of the ACMSF regarding botulism in sheep and goat herds represent an approach that accurately reflects the scientific evidence and the risks to human health, as described in the draft report of the Ad Hoc Group on Botulism in Cattle, Sheep and Goats.</p> <p>FUW therefore endorse the recommendations, and trust that the FSA will adopt the proportional approach that is supported by that evidence.</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p>

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<p>General comments</p>	<p>Hampshire County Council Trading Standards Service</p> <p>[responded email]</p>	<p>Have seen the draft ACMSF report on Botulism in sheep and goats and it seems to have taken a practical approach to the issue of food safety.</p> <p>Believe it is worth noting that this issue crosses over into the field of Feed and Food Hygiene at primary production.</p> <p>The Feed (Hygiene and Enforcement) (England) Regulations 2005 bring the requirements of EC regulation 183/2005 into law. Annex III refers to pasture grazing and the requirement to minimise the contamination of foods of animal origin.</p> <p>The Food Hygiene (England) Regulations 2006 bring the requirements of EC regulation 852/2004 into law. Annex I deals with Primary Production and amongst other things includes requirements to ‘store and handle waste... so as to prevent contamination’.</p>	<p>Noted.</p> <p>This is matter for the FSA to consider.</p>
<p>General comments</p>	<p>NFU England</p> <p>[responded email]</p>	<p>The NFU believe that all policy should be informed by sound science and be evidence based. We agree that human safety is a vitally important factor in food production and we encourage all involved in the food chain to be mindful of this.</p> <p>The NFU welcome the report and believe it to be well constructed and showing evidence of sound scientific reasoning.</p> <p>NFU would recommend that FSA accept the report and its conclusions in its entirety.</p>	<p>Noted.</p>

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General comments	NFU Scotland [responded by email]	NFU Scotland welcomes the sensible approach that the FSA has taken over concerns about botulism in sheep and goats and also previously in cattle. NFUS fully supports the need for potential human health risks from animal products to be properly investigated and believes that where no, or insignificant, risks are found there should be no restrictions placed on products.	Noted.
General comments	Scottish Association of Meat Wholesalers [responded by email and letter]	We are pleased that the issues have been considered in depth and that this has been done in a balanced and proportionate fashion. Food safety and consumer confidence are very important issues for the red meat slaughtering and processing sector in Scotland and we therefore welcome the reassurance contained in the report’s findings.	Noted.

Respondent	Method of Response	Comment	Response
Poultry litter: paragraph 25 - 28	Country Land and Business Association [responded by email and letter]	The CLA would also point out that with the price of fertilisers increasing rapidly, poultry litter has reached the stage where is it an important resource and as such great care should be taken to ensure that its’ use as a farmland fertiliser is not handicapped in any way.	Noted. The remit of the Group was to consider botulism in sheep and goats. The Group is not suggesting any changes to the rules for the use of poultry litter as fertilizer.
Estimation of risk of human	Veterinary	Noted one inaccuracy at Para 39 - toxin type	Text amended in paragraph 23 and 39 of the report.

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<p>botulism from sheep and goats: paragraph 39</p>	<p>Laboratory Agency [responded by email]</p>	<p>(A) likely to affect humans has been recorded in (zebu) cattle. See the following reference Schocken-Iturrino, R.P, Avila, F. A., Berchielli, S .C. P., Nader Filho, A. (1990). First case of type A botulism in zebu. The Veterinary Record, March 3, 217-218</p>	<p>Reference to type A botulism in zebu can be found at paragraph 23 (second sentence).</p>
<p>Conclusions: paragraph 44</p>	<p>Country Land and Business Association [responded by email and letter]</p>	<p>The CLA welcomes the conclusions of the Ad Hoc group that <i>“the risk to humans from consuming meat and milk from clinically normal sheep or goats in flocks/herds in which clinical cases occurred is negligible”</i>, and agrees entirely that there should be no requirement to restrict meat or milk from healthy sheep or goats from farms where there have been suspected cases of botulism.</p>	<p>Noted.</p>
<p>Report Recommendations: paragraph 45</p>	<p>The Goat Veterinary Society [responded by letter]</p>	<p>The Goat Veterinary Society welcomes and supports the key recommendations of the ACMSF Ad Hoc Group that in the absence of other signs, there should be no requirement to restrict the sale of meat or milk from healthy sheep or goats from farms where there have been suspected cases of botulism.</p> <p>The Society also recognises the need for continued vigilance and monitoring, and endorses the concerns that can arise from spreading chicken manure on pasture, a process which would be very rare indeed in goat husbandry.</p> <p>We feel that the recommendations are in line with all known scientific studies of the subject, put the minimal risk involved in its proper perspective.</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p>

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		We would like to make a point that possible cases of botulism may be missed if owners are charged for a post mortem on a sheep or goat that has low value. It would encourage reporting if suspect cases were to be post mortemed at the VLA free of charge.	Noted. This is a matter for the Veterinary Laboratories Agency.
Report Recommendations: paragraph 45 (a)	NFU Scotland [responded email]	by NFUS supports the recommendations made in the report that in the absence of other signs there should be no restriction on meat or milk from healthy sheep or goats from farms where there have been suspected cases of botulism. The absence of potential restrictions, or associated stigma, may encourage increased reporting of cases of suspected botulism allowing greater monitoring and information about the disease to build up.	Noted.
paragraph 45 (c)		NFUS agrees that the FSA should work closely with the poultry industry on good practice for litter management and disposal. This advice should also be extended to sheep and goat farmers to reinforce information on the storage and spreading of poultry litter on agricultural land and on the prevention of on-farm botulism.	This is already recommended in Paragraph 45c of the report.
Report Recommendations: paragraph 45 (c)	Hampshire County Council Trading Standards Service [responded email]	by The food hygiene aspect has obviously been considered but there is little consideration of the enforcement aspect of both food and feed hygiene which are carried out by Local Authorities. This should, I feel, be reflected in the recommendations of the group. It is not just Agriculture departments that interact with farmers. It is becoming more common that areas of concern	Text amended in paragraph 45 (c) of the report.

SUMMARY OF SUBSTANTIVE COMMENTS TO THE ACMSF CONSULTATION – ADVISORY COMMITTEE ON THE MICROBIOLOGICAL SAFETY OF FOOD’S DRAFT REPORT ON BOTULISM IN SHEEP AND GOATS

		overlap into different specialist group remits. It is therefore worth when such groups meet to bear in mind that additional information may be sought even from within the same organisation, e.g. Advisory Committee on Animal Feeding Stuffs (ACAF), to provide a fuller picture to the groups when considering such issues.	Report was circulated to ACAF for comments.
Report Recommendations: paragraph 45 (c and d)	Scottish Association of Meat Wholesalers [responded by letter]	We welcome the recommendations concerning the provision of advice to farmers by the GB Agriculture departments and veterinary/farmer surveillance.	Noted.

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SUMMARY OF CHANGES MADE:

Comment	Response
<p>Estimation of risk of human botulism from sheep and goats: paragraph 39 –VLA comment</p> <p>Noted one inaccuracy at Para 39 - toxin type (A) likely to affect humans has been recorded in (zebu) cattle. See the following reference</p> <p>Schocken-Iturrino, R.P, Avila, F. A., Berchielli, S .C. P., Nader Filho, A. (1990). First case of type A botulism in zebu. The Veterinary Record, March 3, 217-218</p>	<p>Text amended in paragraph 23 and 39 of the report. Reference to type A botulism in zebu can be found at paragraph 23 (second sentence).</p> <p>“Seven serotypes (A-G) of botulinum toxin are recognised, of which types A, B and E are associated with human disease (Cherington, 1998). Types C and D are primarily associated with disease in cattle, although there is a single report of type A botulism in range cattle in Brazil (Schocken-Iturrino <i>et al</i>, 1990). Similarly, the main botulinum toxin types reported to affect sheep are C and D, with type C being the more common toxin type involved in botulism outbreaks (Lewis, 2007)”.</p>
<p>Report recommendations: paragraph 45 (c) - Hampshire County Council comments</p> <p>The food hygiene aspect has obviously been considered but there is little consideration of the enforcement aspect of both food and feed hygiene which are carried out by Local Authorities. This should, I feel, be reflected in the recommendations of the group. It is not just Agriculture departments that interact with farmers.</p> <p>It is becoming more common that areas of concern overlap into different specialist group remits. It is therefore worth when such groups meet to bear in mind that additional information may be sought even from within the same</p>	<p>Text amended in paragraph 45 (c) of the report. “UK agriculture departments should reinforce their advice to farmers involved in the production, storage and spreading of poultry litter on measures for the prevention of on-farm botulism and the FSA should work closely with the poultry industry and enforcement bodies to ensure good practice in litter management and disposal, while recognising that practical solutions will need to take into account local factors such as availability of arable land or other means of disposal of litter. This advice should be extended to sheep and goat farmers”.</p>

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List of Respondents:

1. Prof. Dr Helge Boehnel
2. Country Land and Business Association
3. Farmers' Union Wales
4. Hampshire County Council Trading Standards Service
5. National Farmers' Union England
6. National farmers' Union Scotland
7. Scottish Association of Meat Wholesalers
8. The Goat Veterinary Society
9. Veterinary Laboratories Agency