

Removal of SRM Vertebral Column From Cattle 24 – 30 Months of Age: A Brief Guide for Butchers

Background:

- Vertebral column (VC) or backbone is now classified as specified risk material (SRM) in cattle over 24 months of age at slaughter. This means it must be removed, stained, and safely disposed of. **It must not be sold to the public.**
- SRM VC in carcasses of cattle between 24 – 30 months of age at slaughter **must** be removed in cutting plants or in butcher shops specifically authorised, monitored and registered for this purpose. These carcasses and part carcasses will be identified by a red stripe on the label applied in the slaughterhouse.
- SRM VC in carcasses of cattle over 30 months of age at slaughter can only be removed in authorised cutting plants. This is part of the robust enforcement regime that was put in place last November to enable over 30 month animals back into the food chain. So butchers' will **not** be able to remove vertebral column from these carcasses.
- The carcasses requiring VC removal in the different types of premises can be identified as follows :
 - (i) Less than 24m VC is not SRM. A blue stripe label is present. Removal of VC is allowed in any type of premises (although removal is not a legal requirement).
 - (ii) 24m-30m VC is SRM. A red stripe label is present. Removal of VC is allowed in authorised butchers' and approved cutting premises.
 - (iii) Over 30m (OTM) VC is SRM. No stripe is present on the label. Removal of VC is allowed in specifically approved cutting premises.
- Butchers' means
 - retail butchers
 - butchers' which are part of a larger retail outlet (i.e. in a supermarket)
 - catering butchers', which are not under MHS supervision
 - farms that have facilities to cut carcass meat prior to sale in a farm shop, at farmers' markets or by mail or internet order.

The Legislation

1. The legislation covering the conditions set out in the Background is the Community TSE Regulation (EC) No 999/2001 (Annex XI relates to SRM). These EU Regulations are enforced in England through the Transmissible Spongiform Encephalopathies No. 2 Regulations 2006. (SI No. not yet available). Schedule 6 refers to SRM.
2. Detailed rules relating to bovine vertebral column are re-produced at Annex A to this Guide.
3. In addition you should be aware that after removal from the carcass the vertebral column **must** be placed in a labelled, lidded, leak proof bin and stained blue. The stain to be used is a 0.5% weight/volume solution of the colouring agent Patent Blue V:(E131, 1971 Colour index No 42051(a)). Supplies of the dye can be obtained from reputable suppliers of food dyes. If you have any problems about obtaining a supply it is suggested you contact the slaughterhouse you deal with most frequently, who should be able to advise you.
4. You should also be aware that failure to comply with the legislation and to completely remove all the parts of the vertebral column that are SRM (see Annex A) could result in prosecution and the suspension or revocation of the authorisation.
5. Disposal of SRM is covered by separate legislation, the Community Animal By Products Regulation (EC) No 1774/2002 (Article 4.2) which is enforced in England by The Animal By Products Regulations 2005 (SI 2005/2347). See paragraphs 11 - 19 below.

Applying for an authorisation:

6. Before applying for an authorisation to remove SRM bovine VC you should familiarise yourself with the **legal requirements for the removal, handling and disposal of SRM**. You should only apply for a licence if you are satisfied you can fully meet these requirements.
7. To obtain an authorisation to remove SRM VC you should do the following :
 - (i) Consider the **Protocol**, which outlines the responsibilities of the Food Business Operator (FBO) and the local authority.
 - (ii) Consider the **“Required Method of Operation” (RMOP)**. This sets out the procedures you should follow in removing, handling and disposing of SRM VC and sets the basic requirements for complying with the Regulations. If necessary this can be modified to suit your

particular circumstances. This should be signed and returned to your local Environmental Health Service.

- (iii) Complete the **application form**. This should be signed and returned to your local Environmental Health Service along with your RMOP.

All 3 documents referred to above are enclosed with this guidance note.

- 8. If satisfied the Environmental Health Service will then register your premises and issue an authorisation and sign and return the RMOP. It should not normally be necessary for them to visit your premises prior to issuing the authorisation.
- 9. Your local Environmental Health Service will enforce the rules on the removal, staining and disposal of SRM VC at your premises. They will monitor your procedures against the RMOP during their normal planned food hygiene inspections.

Disposal of VC SRM, Category 1 material from butchers' shops

- 10. The Community Animal By-Product Regulation (EC) 1774/2002 lays down animal and public health rules for the collection, transport, storage, handling, processing, use or final disposal of animal by-products. Butchers will already dispose of raw meat, which is a category 3 material, in line with this Regulation.
- 11. VC from the carcasses of 24-30 month animals is SRM and therefore category 1 material. The Regulation requires Category 1 material to be collected and transported without undue delay. Article 4(2) also lists the options for disposal of category 1 materials. Basically you must arrange for the material to be collected and transported to an approved intermediate plant (collection centre) or direct to an approved incinerator or processor.
- 12. Identification – Category 1, 2 and 3 animal by-products must be kept separate and identifiable during collection and transportation. The container holding the category 1 material must be clearly labelled 'Category 1 material – for disposal only'.
- 13. However if other waste is mixed in the same container with Category 1 waste then it all must be stained blue, identified as category 1 material and disposed of accordingly.
- 14. Containers – must be covered and leak-proof and must be clean and dry before use and must be cleaned, washed and disinfected after each use.

15. Commercial documents – As for the transport of Category 3 raw meat, a commercial document (CD) must accompany the Category 1 animal by-products.

16. The commercial document must specify:

- the date of consignment of the material;
- the description of the material including the wording 'Category 1 material – for disposal only';
- the quantity of the material;
- the place of origin of the material;
- the name and address of the carrier; and
- the name and address of the receiver.

17. The commercial document must be produced in triplicate with the original accompanying the consignment to its final destination and copies kept by both the originator (in this case the butcher) and the carrier. Though not a legislative requirement, the Commission consider that it is good practice if the receiver returns a copy of the commercial document to the originator to confirm that the material has been received at the destination.

18. A copy of the commercial document must be retained and available for inspection for a period of two years.

Annex A: rules on bovine vertebral column

1. The Community TSE Regulation (EC 999/2001 (as amended)) specifies that the vertebral column, excluding the vertebrae of the tail, the spinous and transverse processes of the cervical, thoracic and lumbar vertebrae and the median sacral crest and wings of the sacrum, but including the dorsal root ganglia of bovine animals over 24 months is designated as specified risk material.
2. The rule does not apply to cattle which were born continuously reared and slaughtered in the following countries, and imported into the UK:

Member States:

Sweden

Third Countries

Argentina
Australia
Iceland
New Caledonia
New Zealand
Panama
Paraguay
Singapore
Uruguay
Vanuatu