

# Consultation on the National Control Programme for *Salmonella* in laying flocks

EVIDENCE SUBMITTED BY THE SOCIETY FOR GENERAL MICROBIOLOGY (SGM)

## Consultation questions

Do you agree with the analysis and the costs accompanying the options set out in the RIA?			
Yes	<input type="checkbox"/>	Mostly	<input type="checkbox"/>
To some extent	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
<b>Comments</b>			
<p>I have no particular comments on the costings of sample collection and processing as these appear to be based on established costings in line with current practice. I do have some comments with regard to overall cost estimations. The figure of 8% is quoted throughout as the current prevalence of <i>Salmonella</i> from the baseline survey. There is an underlying assumption that this is evenly spread over the whole of the industry. Do the data so far support this as a reasonable assumption? If particular sectors of the industry are more of a problem than others would this alter the costings?</p> <p>In terms of the benefits estimations, in point 103 it is assumed a reported case is likely to require two weeks off work. However in some sectors there is a need to provide three clear swabs before return to work (e.g. food sector) and this is likely to take longer than two weeks to achieve.</p>			

Which of the proposed implementation options do you support on the collection of samples under the control of the Competent Authority?	
<b>Option 1 – do nothing (continue with the sampling and testing under current voluntary arrangements)</b>	
<b>Option 2 – for auditing and CA sampling to be under the direct control of government</b>	
<b>Option 3 – for responsibilities for the management and auditing and of the NCP to be shared between government and industry</b>	
<b>Option 4 – for an independent Control Body to conduct auditing and CA sampling</b>	
<b>Comments</b>	
<p>In general, I am in agreement with the analysis for the options under review and consider them to have been well conceived taking both the industry and the requirement for public</p>	

health into consideration. With regard to the differing options:

Option 1 – no change to current practice – is not an option as this relies on voluntary action and all eligible producers need to meet the new requirements. Any risk of non-compliance could impact on trade and set a poor example for other Member States.

The NCP for breeders has already been agreed – the document gives no details of how this is being implemented; there would be some merit in the schemes being administered in the same way. The point that food business operators should take responsibility for the safety of their products is well made and is more in line with options 3 & 4.

Option 4 has a lot of merit to it as it would integrate the sampling process as part of existing Farm Assurance Schemes and would thus be seen as compliance with a scheme the producer has already agreed to and which is seen as beneficial. This system also has advantages in terms of administration as sample collection could be integrated as part of the current programme of visits and the costs could be centrally collected as outlined. However the main problem then lies with those producers outside of any Assurance Schemes. The formation of a group for non-affiliated farmers has the disadvantage that there are unlikely to be other unifying remits for such a body and therefore it becomes solely a testing agency. These producers may then need to be covered by Option 3 which means a single system is not in operation. However, it may encourage some producers to join Assurance schemes.

Although small producers who sell direct to customers are exempt, there should be a provision for them to be required to carry out testing if they are shown to be associated with an outbreak or if they supply an at risk group e.g. schools, old peoples homes as these are vulnerable groups.

**Have any practical or affordable implementation options been left out?**

**What are they?**

**Comments**

None

**Do you believe there ways in which government can support industry to reduce/control *Salmonella* prevalence on farm which the RIA does not consider?**

**Comments**

One of the comments that arises regarding *Salmonella* contaminated flocks is the occurrence of testing for and identification of the vaccine strains. The frequency with which this arises is not indicated but it is clearly not beneficial to the industry if this causes an increase in testing. Improvement to vaccine production which avoids this would benefit the industry.

## Sources

This evidence has been prepared on behalf of SGM by Professor Christine Dodd (University of Nottingham).

## About the SGM

The Society for General Microbiology, founded in 1945, is an independent professional scientific body dedicated to promoting the 'art and science' of microbiology. It has now established itself as one of the two major societies in the world in its field, with some 5,500 members in the UK and abroad.

Society membership is largely from universities, research institutions, health and veterinary services, government bodies and industry. The Society has a strong international following, with 25% of membership coming from outside the UK from some 60 countries.

The Society is a 'broad church'; its members are active in a wide range of aspects of microbiology, including medical and veterinary fields, environmental, agricultural and plant microbiology, food, water and industrial microbiology. Many members have specialized expertise in fields allied to microbiology, including biochemistry, molecular biology and genetics. The Society's membership includes distinguished, internationally-recognised experts in almost all fields of microbiology.

Among its activities the Society publishes four high quality, widely-read research journals (*Microbiology*, *Journal of Medical Microbiology*, *Journal of General Virology* and *International Journal of Systematic and Evolutionary Microbiology*). It also publishes a highly respected quarterly magazine, *Microbiology Today*, of considerable general educational value. Each year the Society holds two major scientific meetings attended by up to 1500 microbiologists and covering a wide range of aspects of microbiology and virology research.

The governing Council of the SGM has a strong commitment to improving awareness of the critically important role of microbiology in many aspects of human health, wealth and welfare. It has in this connection recently initiated a 'Microbiology Awareness Campaign' aimed at providing information to the government, decision makers, education authorities, media and the public of the major contribution of microbiology to society.

An issue of major concern to the Society is the national shortage of experienced microbiologists, particularly in the field of clinical microbiology and in industry. To attempt to improve this situation long-term, the Society runs an active educational programme focused on encouraging the teaching of microbiology in university and college courses and in the school curriculum, including primary schools. Some 400 schools are corporate members of SGM.

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