

**FSA CONSULTATION ON
The Proposed Amendments to the Domestic Transmissible Spongiform
Encephalopathies (No 2) Regulations 2006 (as amended) (England)**

EVIDENCE SUBMITTED BY THE SOCIETY FOR GENERAL
MICROBIOLOGY (SGM)

Introduction

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.

General Comments

Much of the document deals with the logistics of safe processing of food and conforms to already existing regulations.

Specific Comments

The *proposed amendments* are:

1. changes arising from the Commission's proposal to increase the age at which bovine vertebral column (VC) is classified as specified risk material (SRM)
2. revocation of the Beef Bones Regulations 1997
3. introduction of a provision to allow enforcement of EU rules on trade
4. changes to Schedule 7 to correct references to EU legislation

Comments:

1. After study of the documentation there has been ample consideration of the proposal to change the age of bovine animals above which their vertebral column (VC) is classified as specified risk material (SRM), from 24 to 30 months. The EFSA Biohazard Panel and the EC Standing Committee on the Food Chain and Animal Health have both considered and approved this proposal in May and October 2007 respectively. The conclusion 'that the additional risk for consumers from the proposal remains negligible' is supported, as is the proposed change in the regulations.
2. The revocation of the Beef Bone Regulation 1997 is principally supported. As the EC TSE regulations apparently do not require this measure, there is no good reason why its revocation from the English

Regulations should not be carried out. However, it should be considered whether there should be an upper age limit on the animals whose bones are processed.

3,4. Points 3 and 4 are administrative measures which are not contentious.

Sources

This evidence has been prepared on behalf of SGM by Dr Ulrich Desselberger.

About the SGM

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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