

# **Proposal to amend the Transmissible Spongiform Encephalopathies (Scotland) Regulations 2010**

## **Consultation**

Open: 25 February 2019

Close: 11 March 2019

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Scottish Government  
Riaghaltas na h-Alba  
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**Food**  
Standards  
Scotland  
Inbhe  
Bidh Alba

## Topic

This consultation is seeking views on amending the Transmissible Spongiform Encephalopathies (Scotland) Regulations 2010. The following proposed amendments are adopting changes to EU legislation that have already been implemented across the UK on an administrative basis:

- Removal of the requirement for abattoirs slaughtering cattle that require BSE testing to have a required method of operation (RMOP)
- Amendment to domestic legislation regarding on-farm controls for classical scrapie
- Proposal to permit the feeding of pig and poultry processed animal protein to farmed fish
- Proposal to enable the feed industry to use processed animal protein derived from insects in feed for aquaculture
- Amend the list of tissues from ruminants (cattle, sheep and goats) that are designated as Specified Risk Material (SRM) to reflect changes to EU legislation
- Amendment to labelling carcasses of bovine vertebral column removal
- Provide a statutory mechanism by which food business operators can apply for approval to use an alternative method of spinal cord removal, other than carcass splitting, for sheep and goats aged over 12 months of age
- Clarify wording relating to the removal of SRM from sheep and goats in a slaughterhouse
- Provide a statutory mechanism to permit the Competent Authority of the Member State of slaughter to approve an alternative method, other than dentition, to determine the age of sheep and goats for SRM removal purposes
- Proposal to amend the specification of the colouring agent for the staining of SRM

## Responding to this consultation

**Please respond to this consultation through email to the email address:**

[BSEConsultation@gov.scot](mailto:BSEConsultation@gov.scot)

If you are unable to respond via email, please submit your response through post. You can post your response to: Scottish Government Animal Health – Disease Prevention Team, P Spur, Saughton House, Broomhouse Drive, EH11 3XD. Please ensure that consultation responses are submitted before the closing date.

## **Scottish Government consultation process**

Consultation is an essential part of the policy making process. It gives us the opportunity to consider your opinion and expertise on a proposed area of work.

Responses will be analysed and used as part of the decision making process, along with a range of other available information and evidence. We will publish a report of this analysis for every consultation. Depending on the nature of the consultation exercise the responses received may:

- indicate the need for policy development or review
- inform the development of a particular policy
- help decisions to be made between alternative policy proposals
- be used to finalise legislation before it is implemented.

While details of particular circumstances described in a response to a consultation exercise may usefully inform the policy process, consultation exercises cannot address individual concerns and comments, which should be directed to the relevant public body.

## **Handling your response**

Please indicate how you wish your response to be handled and, in particular, whether you are content for your response to be published. If you ask for your response not to be published, we will regard it as confidential, and we will treat it accordingly.

All respondents should be aware that the Scottish Government is subject to the provisions of the Freedom of Information (Scotland) Act 2002 and would therefore have to consider any request made to it under the Act for information relating to responses made to this consultation exercise.

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<https://beta.gov.scot/privacy>

## **BACKGROUND INFORMATION**

### **Introduction**

Transmissible Spongiform Encephalopathies (TSEs) are fatal brain diseases that include Bovine Spongiform Encephalopathy (BSE) in cattle and scrapie in sheep and goats. Exposure to BSE through the consumption of infected or contaminated meat is believed to be the primary cause of variant Creutzfeldt - Jakob disease (vCJD) in humans. The European Food Safety Authority (EFSA) has advised that BSE is the only animal TSE that has been shown to be a risk to human health.

There are two forms of BSE: classical BSE, which is believed to be transmitted due to cattle eating contaminated feed primarily through deliberate or accidental inclusion of infective meat and bone meal; and atypical BSE, which is regarded by the World Organisation for Animal Health (OIE) as a condition believed to occur spontaneously in all cattle populations at a very low rate.

There are also two forms of scrapie. The first is classical scrapie, which is transmitted from mother to offspring immediately after birth or to other sheep and goats via fluids and tissues from an infected animal. Farmers are encouraged to breed sheep for genetic resistance to classical scrapie. Genetic resistance to classical scrapie in goats is very low. The second is atypical scrapie, which is considered by the OIE to be clinically, pathologically, biochemically and epidemiologically unrelated to classical scrapie, may not be contagious and may, in fact, be a spontaneous degenerative condition of older sheep. No genetic resistance to atypical scrapie has been detected in sheep and no cases of atypical scrapie have been recorded in goats in the UK.

Regulation (EC) No. 999/2001 of the European Parliament and the Council, as amended (the EU TSE Regulation) lays down rules for the prevention, control and eradication of TSEs, including BSE in cattle and scrapie in sheep and goats. The Scottish Government seeks to implement TSE controls, in line with EU requirements, and in the interest of public health and animal health protection.

## PROPOSED CHANGES

The proposed amendment to the Transmissible Spongiform Encephalopathies (Scotland) Regulations 2010 (2010 Regulation) would update the existing Regulations to bring them in line with the EU TSE Regulation prior to EU Exit. The EU TSE Regulation has been substantially updated to the effect that several parts of 2010 Regulation is now out of date. The SSI needs to be made and laid on or before EU exit day to ensure that we can rely on the powers under section 2(2) of the European Communities Act.

Our proposals would contribute to TSE controls that are based on scientific advice and are considered proportionate to the risk to public and animal health in line with the European Commission's [TSE Roadmap 2](#)<sup>1</sup>, (2010-2015), which had a strategic goal to review the current animal feed ban and consider appropriate revisions to feed legislation in line with the principles of proportionate and precautionary response.

The TSE Roadmap 2 officially ended on 31 December 2015 but, in the absence of a new EU TSE strategy document, the Commission still wants TSE controls to be renegotiated in line with the outstanding items of the Roadmap. The aim is to continue to align TSE controls closer with the international standards of the World Organisation for Animal Health (OIE), if considered safe and backed up by scientific evidence.

The Scottish Government supports a risk-based, proportionate approach that eliminates any unnecessary burdens. We supported the objectives set out in the TSE Roadmap 2 document and continue to support the principle of the Commission bringing forward proposals for debate and potential regulatory change where there are grounds for reconsidering whether existing TSE control measures are disproportionate to the risk.

We are confident that these proposals would have a net benefit to the farming, abattoir and feed industries. The purpose of this consultation is to seek feedback on the anticipated impact of our proposals from stakeholders in these industries and other interested parties.

The majority of our proposals are adopting changes to EU legislation that have already been implemented across the UK on an administrative basis.

### **Removal of the requirement for abattoirs slaughtering cattle that require BSE testing to have a required method of operation (RMOP)**

In 2005 a requirement was added to domestic TSE legislation for abattoirs slaughtering cattle that require BSE testing to have a Required Method of Operation (RMOP), which has been approved by Scottish Ministers. A RMOP is an agreement between the Official Veterinarian and the Food Business Operator in charge of the abattoir on the details of the slaughter process at abattoirs processing cattle

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<sup>1</sup> [https://ec.europa.eu/food/sites/food/files/safety/docs/biosafety\\_food-borne-disease\\_tse\\_roadmap2.pdf](https://ec.europa.eu/food/sites/food/files/safety/docs/biosafety_food-borne-disease_tse_roadmap2.pdf)

slaughtered for human consumption, which require testing for BSE. This change was implemented on the advice of the FSA to enable the UK to introduce a system of BSE testing of older cattle to replace the Over Thirty Months Rule, which had banned the sale for human consumption of meat from cattle aged over thirty months at the time of slaughter since March 1996, to protect public health and maintain public confidence in cattle meat. The requirement for an approved RMOP, which exceeded the requirements of the EU TSE Regulation, was needed to ensure that abattoirs in GB slaughtering cattle requiring BSE testing would have robust sampling, retention and disposal systems that safeguarded human and animal health.

Commission Decision 2009/719 was amended on 4 February 2013 (Commission Decision 2013/76/EU) to give twenty-five Member States, including the UK, the option to end routine BSE testing of healthy cattle aged over 72 months slaughtered for human consumption, which were born in the UK and all other EU Member States except for Romania and Bulgaria, from 4 February 2013 (Commission Decision 2016/851/EU). The UK implemented this option on 1 March 2013. As a result, RMOPs for the occupier (Food Business Operator - FBO) of participating slaughterhouses were subsequently modified and their requirements made proportionate to the significantly reduced risk. The only cattle from abattoirs now tested for BSE are 'risk' animals aged over 48 months (emergency slaughtered cattle and those found to be sick at ante mortem) and a negligible number of healthy slaughtered animals aged over 30 months and 'risk' animals aged over 24 months born in Bulgaria, Romania and third countries, a reduction from about 300,000 cattle tested per year in GB to less than 5,000.

Our proposal would remove the legal requirement for a RMOP signed by the Scottish Ministers because it is no longer justified. This would also remove the offence provision currently applicable to an occupier for use of an abattoir without an approved RMOP. Abattoir operators would be expected to agree a Standard Operating Procedure (SOP) with the FSS, which will continue to maintain food safety and BSE controls.

### **Amendment to domestic legislation regarding on-farm controls for classical scrapie**

Annex VII of the EU TSE Regulation lays down rules for the control of classical and atypical scrapie on holdings where the disease has been detected. Scrapie occurs at a low prevalence in the UK. EFSA has advised that scrapie has not been shown to be a risk to human health.

Classical scrapie has been recognised in the United Kingdom for over 250 years. The genetic make-up of sheep determines their susceptibility to classical scrapie, and genotyping and selective breeding have been used as control tools for the disease. However, goats do not exhibit a similar genetic variability and are believed to be generally susceptible to classical scrapie.

In 2007 the EU introduced more proportionate controls for sheep flocks and goat herds affected by classical scrapie. It introduced the option of:

- i. Reducing genotyping requirements to 50 sheep per flock;
- ii. Monitoring classical scrapie-affected sheep flocks and goat herds for two years following the detection of the last case, instead of killing and destroying genetically susceptible animals over 3 months of age (approximately 25% of sheep and 100% of goats) (monitoring option);
- iii. Allowing meat from genetically susceptible animals into the food chain subject to a negative post-mortem TSE test on animals over 18 months of age and the removal of specified risk material (SRM); and
- iv. TSE testing all fallen animals over 18 months of age.

The French government challenged the EU's legislative amendments in Case T-257/07. The EU General Court suspended the contested provisions pending final judgement in the legal case. In its judgement of 9 September 2011, the EU Court dismissed the French government's challenge and reinstated the suspended provisions. The more proportionate controls for scrapie were reintroduced in Commission Regulation (EU) No 630/2013.

Where a case of classical scrapie is confirmed on a holding, the EU TSE Regulation provides options of killing and destroying or slaughtering all sheep and goats on the holding (option 1); or culling/slaughtering all goats and those sheep that are genetically susceptible to classical scrapie (Option 2); or monitoring the holding, with no killing or destruction of sheep or goats (Option 3).

In Scotland, the default control option following confirmation of classical scrapie on a sheep or goat holding is Option 3 (monitoring/surveillance with no killing or destruction of animals). This approach was implemented by the Scottish Government on 1 July 2013, pending an amendment to domestic legislation.

In all cases where classical scrapie is confirmed, following initial action the holding is placed under movement restriction for two years following the detection of the last case. During this period all sheep and goats on the holding over 18 months of age that are slaughtered for human consumption, or that die or are killed other than for human consumption ('fallen stock') must be tested for TSEs. The government pays all costs of sampling, transportation of samples to government approved laboratories, and testing, and arranges and pays for the collection and destruction of the carcasses of all 'fallen stock' sheep and goats over 18 months of age. Animals slaughtered for human consumption are sent to designated abattoirs where they are sampled and the carcasses are retained until the test results are available. Carcasses which test positive or inconclusive to scrapie are removed from the food chain and destroyed. Milk and milk products from sheep and goats from classical scrapie holdings with animals to be destroyed/ slaughtered, must not be fed to ruminants outside the holding where they were produced until the possibility of BSE on the holding has been ruled out. During this period the milk and milk products can only be used, stored and transported as feed for non-ruminants within the UK under strictly controlled conditions, and must not be exported as feed for non-ruminants.

In 2013 the EU TSE Regulation was rewritten and re-ordered in line with the latest EFSA advice, to clarify the control options available following the detection of

classical scrapie on a holding. It introduced the following changes to on-farm controls:

- (i) Where previously farmers on affected sheep holdings under monitoring restrictions have been advised to breed from rams that are genetically resistant to classical scrapie, it now would become a legal requirement. (NB: There are no similar breeding restrictions on goat holdings because goats are not recognised as genetically resistant to classical scrapie).
- (ii) The existing ban on the feeding to ruminants outside the holding, of milk and milk products from animals present on the holding at the time the disease was confirmed, would be extended from the time when the possibility of BSE has been ruled out, to the end of the movement restriction period where the monitoring option has been applied, two years after the confirmation of the final case of classical scrapie on the holding. As it is not general practice for sheep and goat milk and milk products to be sold for feeding to ruminants on other holdings, the effects of this change upon the sheep and goat industry as a whole is expected to be negligible.
- (iii) To prevent the possible spread of infection, common grazing would be prohibited during the lambing and kidding period for animals from holdings under classical scrapie controls.

Atypical scrapie has been detected since 1998, primarily through the EU testing programme for the testing of fallen stock and healthy sheep slaughtered for human consumption at abattoirs. However, retrospective studies have indicated that it has been present in the UK since the late 1980s. The latest scientific advice from EFSA and the European Centre for Disease Prevention and Control (ECDC) dated 19 January 2011 indicates that unlike classical scrapie, which is transmissible between animals, atypical scrapie is unlikely to be naturally transmissible or has very low transmissibility.

Where a case of atypical scrapie is confirmed on a holding, it is placed under movement restriction and monitored for two years following the detection of the last case, with no killing or destruction of sheep or goats.

In 2013 the EU TSE Regulation was rewritten and re-ordered in line with the latest EFSA advice, to clarify the control options available following the detection of atypical scrapie on a holding. It introduced the following changes to on-farm controls:

The following atypical scrapie controls would be removed:

- (i) The prohibition on movement of animals on and off the holding, other than to slaughter, during the two year period following confirmation of the last case of atypical scrapie.
- (ii) The prohibition on the export to Member States or third countries of live sheep and goats, and sheep and goat semen and embryos from holdings affected by atypical scrapie, in the two year period following the confirmation of the last case of atypical scrapie.



The existing requirements for sampling and testing animals aged over 18 months, which leave the holding directly for slaughter (but it does not apply to animals sent for slaughter via markets) or as fallen stock, would remain, to enable Member States to continue to gather scientific data on atypical scrapie.

These measures were implemented across the UK on an administrative basis on 1 July 2013, pending amendments to domestic legislation. Our proposal to adopt these amendments in domestic legislation would continue to ensure that scrapie controls are proportionate to the risk to public and animal health in line with the goals of the TSE Roadmap 2 and with EFSA advice.

### **Proposal to permit the feeding of pig and poultry processed animal protein to farmed fish**

In 2001, to prevent the spread of BSE, the EU introduced a general ban on the feeding of all processed animal protein (PAP) to farmed livestock. This prevents the spread of classical BSE in animals due to eating contaminated feed primarily through deliberate or accidental inclusion of infective meat and bone meal. Scientific evidence has identified contaminated feed as the principal vector of BSE transmission. However, BSE incidence worldwide has declined dramatically in recent years

The EU is therefore considering ways to safely align the ban on the feeding of PAP to farmed livestock with the international standards of the World Organisation for Animal Health (OIE), which only prohibit meat-and-bone-meal (MBM) or greaves derived from ruminants from being fed to ruminants, to reduce unnecessary burdens on the industry and to reduce waste.

As a result, and following independent scientific advice from EFSA, EU legislation, which permits the feeding of pig and poultry PAP to farmed fish, came into force on 1 June 2013 and was implemented in the UK on an administrative basis from that date. This was made possible after the EU validated a polymerase chain reaction (PCR) test capable of detecting very low levels of ruminant material in feed. Enforcement authorities can test for and enforce PAP from ruminants to be banned from animal feed in the presence of pig and poultry PAP. Pigs, poultry and fish are not known to be able to contract or pass on BSE naturally. Pig and poultry PAPs are a potential high quality source of protein that may be cheaper and more sustainable than current protein sources such as fishmeal and soya, the prices for which are currently high and the cause of vast amounts of deforestation around the world.

Our proposal would adopt in legislation the derogation that was implemented administratively across the UK on 1 June 2013.

## **Proposal to enable the feed industry to use processed animal protein derived from insects in feed for aquaculture**

Previously the EU TSE Regulation prohibited the feeding of non-ruminant PAP to non-ruminant farmed animals except under certain derogations, e.g. the feeding of non-ruminant PAP to aquaculture animals. Such PAP has to be derived from slaughterhouses or cutting plants: therefore the use of PAP derived from insects in feed for aquaculture animals was not allowed

Several Member States are now rearing insects for the production of PAP for petfood, using their own national control schemes. Studies have shown that farmed insects could represent a sustainable alternative to conventional sources of animal proteins for feed for non-ruminant farmed animals.

On 8 October 2015, EFSA published a scientific opinion on a risk profile related to production and consumption of insects as food and feed. The opinion concludes that the occurrence of prions in non-processed insects is expected to be equal or lower to current protein sources, as long as insects are fed on substrates that do not harbour material of ruminant or human origin (i.e. human manure). As the processing of insects may further reduce the occurrence of biological hazards, that statement is also valid when it comes to processed animal proteins derived from insects.

Based on the EFSA opinion, the Commission has amended the EU TSE Regulation to permit the use of PAP derived from insects of certain species, reared within the EU and produced in processing plants dedicated exclusively to the production of products derived from farmed insects, and compound feed containing such PAP, to be authorised for feeding to aquaculture animals. The permitted insect species should not be pathogenic or have other adverse effects on plant, animal or human health; they should not be recognised as vectors of human, animal or plant pathogens and they should not be protected or defined as invasive alien species.

This proposal came into force in the EU on 1 July 2017 and was implemented on an administrative basis across the UK on the same date. Our proposal would adopt this amendment in Scottish legislation

## **Amend the list of tissues from ruminants (cattle, sheep and goats) that are designated as Specified Risk Material (SRM) to reflect changes to EU legislation**

SRM is the parts of animals most likely to carry TSE infectivity. Removal of SRM is a key measure in food safety to ensure that public health and animal health is protected from the possible risks associated with TSEs in cattle, sheep and goats. The EU TSE Regulation establishes a list of SRM for ruminants which must be removed and cannot enter the food or feed chain. The list of SRM has been established using scientific knowledge and the precautionary principle. In recent years, advances in scientific understanding have allowed the list to be progressively reduced.

The proposal to amend the list of tissues from cattle that are designated as SRM came into force in the EU on 1 July 2017 and was implemented on an administrative basis across the UK on the same date. Our proposal would adopt this amendment in Scottish legislation.

The proposal to amend the list of tissues from sheep and goats that are designated as SRM came into force in the EU on 30 July 2018 and was implemented on an administrative basis across the UK on the same date. Our proposal would adopt this amendment in Scottish legislation.

The table below provides the list of SRM for countries with a BSE Controlled Risk status such as Scotland, England and Wales. Northern Ireland have a BSE Negligible Risk status and cattle aged over 12 months born, reared and slaughtered there only require the spinal cord and skull, including the brain and eyes, to be removed and prohibited from the food and feed chain.

<b>Cattle</b>	<p><b>All ages</b> The tonsils, the last four metres of the small intestine, the caecum and the mesentery.</p> <p><b>Over 12 months</b> The skull excluding the mandible but including the brains and eyes, and the spinal cord.</p> <p><b>Over 30 months</b> 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 .</p>
<b>Sheep and goats</b>	<p><b>Over 12 months (or permanent incisor erupted)</b> The skull including the brains and eyes, and the spinal cord.</p>

### **Amendment to labelling carcasses of bovine vertebral column removal**

As of 1 July 2017, an amendment to the EU TSE Regulations applied regarding labelling of bovine vertebral column containing SRM, which must be removed and excluded from the food and feed chain. When the removal of the vertebral column is required (i.e. from cattle aged over 30 months from BSE Controlled Risk status countries such as Scotland) carcasses or wholesale cuts of carcasses of bovine animals containing vertebral column shall be identified by a clearly visible red stripe on the label referred to in Article 13 of Regulation (EC) No 1760/2000.

These changes have been fully implemented in all slaughterhouses in Scotland since 1 July 2017. Our proposal would adopt this amendment in Scottish legislation.

**Provide a statutory mechanism by which food business operators can apply for approval to use an alternative method of spinal cord removal, other than carcass splitting, for sheep and goats aged over 12 months of age**

Under the EU TSE Regulation, the spinal cord of sheep and goats that are aged over 12 months, or have one permanent incisor erupted, is deemed to be SRM and must be removed.

Existing UK implementing legislation requires that the carcass is split to remove the spinal cord. However, UK industry contend that carcass splitting significantly reduces carcass value.

Following representations from industry, a joint Food Standards Agency (FSA) / industry task group was set up in 2010 to investigate alternative removal methods that do not involve carcass splitting. The task group set up trials in June and November 2011 looking at possible alternative methods in the UK but these proved to be unsuccessful due to carcass damage. Additionally, the task group recognised that removal methods used in other Member States were unacceptable to the UK food safety authority as complete removal of the spinal cord could not be ensured or verified.

To date, carcass splitting is the only method of spinal cord removal, which the UK meat processing industry and the FSA and Food Standards Scotland (FSS) finds acceptable and effective. The FSA and FSS remain prepared to consider alternative removal methods provided they can be shown to be effective and safe. To this end, we are proposing to include a new provision in Scottish legislation to provide the statutory mechanism by which food business operators in Scotland can apply to the FSS for approval to use an alternative method of spinal cord removal for sheep and goats, should an effective alternative become available. Splitting of the carcass would remain the default method for spinal cord removal.

Adoption of any alternative methods for spinal cord removal would be on a voluntary basis. As with any other significant change to operating processes within approved establishments, there would be a cost to the business in seeking approval to use an alternative method. There would also be a cost to business from purchasing new equipment for any alternative method of spinal cord removal. However as this is a permissive derogation, industry would only take this up if the benefits outweighed costs (i.e. the cost of a new method for removing the spinal cord is less than the current one).

**Clarify wording relating to the removal of SRM from sheep and goats in a slaughterhouse**

This issue came to light in the course of legal proceedings taken by the FSA against an FBO in 2013. The proposed clarification of the existing legislation reflects the fact that the Court's judgement was given in favour of the FSA.

Questions had arisen as to whether the current provision required SRM to be removed from the carcass before post-mortem inspection and whether the spleen could remain inside the carcass at post-mortem inspection so long as it was

'contained in or attached to offal'. In response, the FSA confirmed the long standing position that, save for the permitted exceptions, all other SRM (including the spleen) is required to be removed from the carcass before post-mortem inspection.

The FSA's primary basis for the line it has taken is that Annex I, Section II, Chapter V point (r) of Regulation EC No. 854/2004 obliges the Official Veterinarian to declare meat unfit for human consumption where meat contains SRM, except as provided for under Community (now EU) legislation.

It was reported during the legal proceedings that the current wording of paragraphs 8 and 9 of Schedule 7 ought to be clarified to make the provisions clearer for both the FSA and FSS in its enforcement of the TSE legislation and FBOs' understanding of what the legislation requires of them.

**Provide a statutory mechanism to permit the Competent Authority of the Member State of slaughter to approve an alternative method, other than dentition, to determine the age of sheep and goats for SRM removal purposes**

The EU TSE Regulations stipulate that sheep and goats which have a permanent incisor erupted through the gum are aged over 12 months and therefore, after slaughter, the carcass must be split and the spinal cord removed, handled and disposed of as SRM. However, the use of eruption of a permanent incisor to estimate the age of sheep is an imperfect science and can depend on the breed of sheep. As stated in the FSA's 2010 review of alternative methods of removing spinal cord from sheep and goats, *"ageing by dentition check is an imprecise process as the first incisor can erupt at any point between 9 and 15 months of age."*

An amendment to the EU legislation provides the possibility of estimating whether sheep or goats are over 12 months of age by a method which can be approved by the competent authority of the Member State of slaughter. An industry proposal from the National Farmers Union (NFU) and National Sheep Association (NSA) proposed the use of a date based system (i.e. a calendar cut-off date of 30 June) to be used as opposed to dentition.

It is imperative to ensure public health is protected and a risk assessment undertaken by the Animal and Plant Health Agency (APHA) demonstrates that the risk to the food chain remains negligible whether the dentition method or the date based system is used. Ministerial approval has therefore been provided for this alternative method to be implemented in the UK.

The practicalities of applying such a system has a bearing on the identification of sheep from farm to fork throughout the UK and discussions with sheep industry stakeholders are taking place to develop an implementation plan which is deliverable and verifiable.

This proposal came into force in the EU on 30 July 2018 and was implemented on an administrative basis across the UK on the same date. Our proposal would adopt this amendment in Scottish legislation.

## **Proposal to amend the specification of the colouring agent for the staining of SRM**

Patent Blue V is no longer the prescribed dye for SRM staining. The law now requires that indelible staining must involve treating the SRM with a blue colouring agent using a solution of such a strength that the staining is clearly visible and remains visible after the SRM has been chilled or frozen. Our proposal would adopt this amendment in Scottish legislation.

## RESPONDENT INFORMATION FORM

**Amendments to the Transmissible Spongiform Encephalopathies (Scotland) Regulations 2010**

**Please Note** this form **must** be completed and returned with your consultation response.

To find out how we handle your personal data, please see our privacy policy:  
<https://beta.gov.scot/privacy/>

Are you responding as an individual or an organisation?

- Individual  
 Organisation

Full name or organisation's name

Phone number

Address

Email

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

- Publish response with name  
 Publish response only (without name)  
 Do not publish response

**Information for organisations:**

The option 'Publish response only (without name)' is available for individual respondents only. If this option is selected, the organisation name will still be published.

If you choose the option 'Do not publish response', your organisation name may still be listed as having responded to the consultation in, for example, the analysis report.

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

- Yes  No

**CONSULTATION QUESTIONS**

Respondents should take into consideration the information provided in this document alongside any other knowledge or personal experiences that could be relevant. All opinions are welcome.

Please ensure you complete the Respondent Information Form (**Annex A**). This will ensure that if you ask for your response not to be published that we regard it as confidential and will treat it accordingly.

**Question 1:**

**Do you have any comments on the proposed amendments to the Transmissible Spongiform Encephalopathies (Scotland) Regulations 2010?**

Yes  No

If so, please state and explain your comment(s).