

BVA response to Defra's Livestock Feed Controls in England and Wales review

31 March 2025

Introduction

1. The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With more than 19,000 members, our primary aim is to represent, support and champion the interests of the United Kingdom's veterinary profession. We therefore take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters.
2. We welcomed the opportunity to contribute to Defra's Livestock Feed Controls in England and Wales review.
3. Understanding of Transmissible Spongiform Encephalopathies (TSEs) and how they are transmitted has increased greatly in recent years, and the livestock feed regulations no longer reflect current scientific knowledge or the level of TSE risk.
4. We would agree that although these controls are effective, they were made in a precautionary manner, when little was known Bovine Spongiform Encephalopathy (BSE). Since then, research has demonstrated that pigs and poultry are not naturally susceptible to TSEs, and improvements in feed testing methods allow the National Feed Audit (NFA) to differentiate between ruminant and non-ruminant proteins if found in feed. We believe in an evidence-led approach and these changes would allow legislation to reflect current scientific evidence and advice. They would also allow the Scottish Government to support industry in achieving sustainable farming goals by reducing reliance on imported soyabean and fishmeal protein for poultry and pig feed. Given that these changes have been risk assessed by APHA and, if implemented, will not impact on England's and Wales's high level of animal and public health protection we would broadly support these changes.

Question 1 Do you agree with allowing poultry processed animal protein in porcine feed?

5. Yes.
6. We are generally in support of the statement in relation to the inter-specific risk arising from potential transmission of prions but we have concerns over the risks to animal health presented by other potential pathogens such as African Swine Fever, Classical Swine Fever or Porcine Epidemic Diarrhoea Virus. Before feeding to other livestock, irrespective of species, processing of animal-derived protein must be sufficiently robust to ensure these are 100% deactivated bearing in mind that, as BSE has demonstrated, unexpected disease breakthroughs can occur with hugely significant animal and human disease consequences.
7. In this context, Avian or Swine Influenza must be a specific concern with species crossovers being reported in the US from cattle to humans. Pasteurisation demonstrably eliminates the Avian Influenza virus from milk, so BVA is content that effective health controls are possible,. However, applying similarly effective controls around animal proteins in solid form requires greater diligence, with clear

risks to animals and public health if processing controls are not fully effective or not correctly implemented.

8. We also have concerns with the risks to animal and public health from importation of animal derived protein or the products being made from imported meat, given the risk of less effective controls over inputs and ability to ensure quality and safety in the country of origin.
9. It is almost certain that once the use of these products is allowed in the UK, there may be pressure to allow their importation from other countries. Before the use of such imported products is permitted, there must be a clear and appropriately resourced regime of certification and inspection put in place.

Question 2 Do you agree with allowing porcine processed animal protein in poultry feed?

10. Yes.
11. We are generally in support of the proposal. A key aspect with this particularly will be clear labelling given the implications, for religious groups, of using porcine protein in feed for poultry feed. We welcome the consultation's engagement with Halal and Kosher certification authorities on this and the caveat that these changes are voluntary so businesses will be free to introduce all necessary measures to ensure their products retain religious compliance.

Question 3 Do you agree with allowing insect processed animal protein in porcine and poultry feed?

12. Yes.
13. The production of insects for food and feed carries potential environmental and health benefits, with insect species having a high feed conversion efficiency, low environmental footprint and high-quality protein and nutrients comparable to meat and fish. In some farming sectors such as aquaculture and poultry insects are already being used as feedstock and are likely to become more prevalent.
14. Consideration of this protein feed source would need robust scientific review to establish the vector potentials for any known diseases, or unknown, such as viral families, that can be carried by insects and transferred to pigs or poultry. We would support the proposal to enable the feed industry to use processed insect protein in feed for pig and poultry on the basis that scientific opinion has concluded 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 pig, poultry or other animal proteins.
15. It is also important to consider there is growing research that suggests that some insect species have a level of sentience and even basic problem-solving capability. As such, if insect processed animal protein is used more significantly in feed, then we would need to be more aware of how insects are bred, farmed and handled. What the insects are fed on must also be considered to avoid unintended consequences should they in turn be given mammalian protein in their diets.

Question 4 Do you agree with allowing ruminant collagen and gelatine in non-ruminant feed?

16. Yes.

17. Our concerns with these proposals centres around the risk of cross contamination from the use of different feeds. However, with the information presented in this consultation we are satisfied that Defra has worked with the relevant stakeholders to develop a proposed course of action that will monitor and prevent cross contamination across the feed chain. The proposed changes are not designed to be detrimental to current practices, which will be allowed to continue unaffected. The proposed additional feed options would be available to be used alongside current options.

Question 5 Do you agree with the proposed measures to prevent cross contamination in the feed chain?

18. Yes.

19. Please see answer to Question 4.

Question 6 Please provide any further comments on the proposals set out in this consultation:

20. We strongly support a risk-based, proportionate approach that eliminates any unnecessary burdens, and support proposals which will contribute to TSE controls that are based on scientific advice and are considered proportionate to the risk to public and animal health.

21. It is important that if Defra chooses to proceed with these proposals, these are backed up by the latest scientific research, and that the rationale for their adoption is clearly explained and easy to understand.

22. It is very important changes are brought in at the same time as in the rest of the UK, including Northern Ireland, given the livestock so being fed are traded freely across, and their products eaten in, each region of the country.

23. We would like to emphasise again the need for clarity on how import controls and application of UK standards to imported animal or insect protein products will apply/take place. In addition, there has to be clarity around the monitoring and enforcement of these controls.