

Attn: Paul Jenkins
Food Standards Agency
Food Policy
Chemical Contaminants and Residues Branch
Aviation House
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Email Response to: paul.jenkins@foodstandards.gsi.gov.uk

14 September 2016

AHDB response to the FSA request for comment on proposals for measures to address Cadmium and Lead in bovine offal

About AHDB:

The Agriculture and Horticulture Development Board (AHDB) is a statutory levy board and a Non-Departmental Public Body, funded by farmers, growers and others in the supply chain. Our statutory purpose is to equip levy payers with independent, evidence-based information and tools to grow, become more competitive and sustainable. The sectors we assist cover about 75% of total agricultural output in the United Kingdom (UK). We support commercial horticulture in Great Britain (AHDB Horticulture), potatoes in Great Britain (AHDB Potatoes), cereals and oilseeds in the UK (AHDB Cereals and Oilseeds); pork production in England (AHDB Pork), beef and lamb production in England (AHDB Beef and Lamb) and milk production in Great Britain (AHDB Dairy). AHDB is accountable to Parliament, and it is not a membership organisation and does not 'represent' any industry interests

Thank you for providing AHDB with an opportunity to comment:

Lead:

We understand that the FSA has agreed that the industry prepare and produce some 'Best Practice' guidance to outline options for minimising the risk of lead contamination in livestock from those areas with high geochemical lead. We believe this to be a pragmatic approach to deal with the regional basis of this issue and will work with the National Farmers' Union and others to produce the necessary information.

Cadmium:

We understand that Cadmium is not geographically isolated and affects older animals through a cumulative build-up affect. Having studied the report findings and other reference material (RIMS data and National co-ordinated Sampling Programme), we concur that the evidence supports a 108 month cut-off age, but that there is insufficient robust data at this time to progress 72-84, 84-96 and 96-108 age band cut-offs.

We would make the following more detailed observations:

- The FSA survey sample is very small, with the age of samples in the older groups being 72-84, 84-96, 96-108 age bands (n=8, 9 and 5, respectively), and a positive rate of 12.5%, 22.2% and 0% per age band. We note that the rate above 9+ years consistently reports a higher positive rate and we recognise this evidence is beyond reasonable doubt. However, having discussed the sample dataset with Prof Toby Knowles, a chartered statistician, we believe this sample size is too small upon which to identify accurately and confidently an evidence based cut-off age. Further, given that animals go through a slaughter house in clusters, correlated by farm of origin, geographic location, market of origin, type of animal and age of animal, the small sample size is likely to be biased and therefore even less reliable in identifying a cut off with any accuracy.
- The RIMS/NCSP data, while identifying a trend for older animals to be positive for elevated levels of Cadmium in their kidneys, again have very low levels of positives at a rate of 4%, in line with the current FSA study.
- However, despite the above considerations, samples of 108 months and above do appear to show a marked prevalence of elevated cadmium which we accept as likely to be indicative of a true association with age.
- We feel it is unsound to propose a 72 month cut-off point given the current state of evidence. As a science led-organisation, we feel further work is necessary to establish this with more robustness.
- In the minutes that followed the meeting on 27th July 2015, the following was noted: ***“GS reminded members that the 72 month old and over cattle targeted was not definitive, but a guide to addressing the issues raised in the survey.” (GS being Gavin Shears).***

We propose that as an initial precaution it would be advisable to introduce 108 months as a cut-off and that we would fully support further investigation into the 72-84, 84-96 and 96-108 age bands with further sample collection to increase the sample size in these categories, and with appropriate measures to ensure that properly randomised and representative samples are collected. We would be able to assist FSA in identifying suitable plants, access, sampling, etc to carry out what we believe to be necessary work before arriving at an age related cut-off below the 108 month level.

For further details or enquiries concerning this submission please contact Dr Phil Hadley, Head of Global Supply Chain Development - Phil.Hadley@ahdb.org.uk - 07779 304 185.

Yours



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