**Action Note 2025/06/01: Chapter 2.7: SRM Controls**

**BSE Negligible Risk (NR) status**

**Purpose**

This Action Note is to inform all Authorised Officers (AOs) of the official recognition of BSE negligible risk (NR) status for Scotland, England and Wales, and the impact on FSS Official Controls (OC) and on trade.

**Background**

The UK Chief Veterinary Officer (CVO) applied to the World Organisation for Animal Health (WOAH) for official recognition of BSE NR status for England & Wales and Scotland (as two UK WOAH zones) on 1st ofAugust 2024. Following evaluation in February 2025, the WOAH Scientific Commission concluded that both zones fulfil the requirements to be recognised as having NR for BSE. Delegates of the WOAH General Session voted favourably on 29th of May 2025 and WOAH have published the updated BSE risk status on their website, thus officially recognising all of Great Britain (GB) as Negligible Risk. Northern Ireland is already recognised as NR by the WOAH.

Recognition of NR status for Scotland, England and Wales means that the definition of Specified Risk Material (SRM) for bovine animals that originated in these countries has changed, and some tissues are no longer defined as SRM thus abattoirs and cutting plants (CPs) would no longer be required by domestic legislation to remove and dispose them as category 1. Domestic legislation will still require the removal and disposal of those tissues defined as SRM for countries with NR status (i.e. first 2 lines in Annex 1). The SRM definitions for NR and CR (controlled risk) can be found in [Annex 1](#_Annex_1_–) below.

**Different timelines for the NR status recognition**

The BSE status of the UK is established by the Assimilated Commission Decision 2007/453/EC. This Decision establishes the BSE status for England, Wales, Northern Ireland and Scotland by reference to the website of the OIE (i.e. WOAH), meaning the BSE status changes domestically immediately after WOAH publication on their website.

While the EU also establishes the UK BSE status in the Commission Decision 2007/453/EC, their version contains an Annex where countries or regions are listed. UK (except for NI) is listed under CR status, and this will need to be updated before the EU can recognise the UK as NR. This is estimated to take around 6 months and any trade with the EU will require the SRM CR definitions to remain in place. Therefore, during this interim period, most FBOs may decide (and are encouraged to do so) to continue applying CR controls to enable and protect trade with the EU.

For exports to the rest of the world (ROW) there are different processes to recognise BSE risk status dependent on the country. Different trade partners may have requirements for SRM removal which do not always align with NR requirements under either WOAH or EU Regulations.

**Impact on trade**

EU trade is the most significant one in volume and value – the majority of GB beef exports, including meat, offal and animal by-products (ABP) are exported there either directly, or via Northern Ireland.

It is vital that FSS approved establishments recognise the interim limitations on adopting the NR changes. If they employ a dual processing system, they will need to demonstrate robust segregation and traceability of commodities they, or their customers, are exporting to countries that have not yet updated the GB risk status to NR after the WOAH publication/recognition.

It will be a commercial decision as to whether plants follow CR or NR status requirements until other countries recognise the NR status, although certain processes will need to be established depending on their decision. Any product that cannot demonstrate to meet the requirements outlined in attestations for relevant Export Health Certificates (EHC) will not be eligible for export to the EU, NI or third countries.

Industry has been made aware that any product exported to the EU derived from a bovine animal that has been slaughtered, dressed and produced to NR status controls during the interim period before the EU has formally recognised our NR status, could jeopardise our reputation and relationships with the EU and put our approval to export bovine products at risk.

**Procedure**

While FSS approved establishments can decide whether to immediately implement NR status changes or continue applying CR controls until the EU recognises the new NR status, it is desired that FBOs will continue applying CR controls during the interim period. This is the easiest solution to industry and the one that protects trade.

FSS OVs attending abattoirs processing bovines are to discuss the contents of this Action Note with the FBOs and explain the implications of their decision. FBOs should be asked to confirm whether they wish to implement the NR status changes or continue with current CR controls until the EU recognises also the NR status.

For establishments wishing to implement NR status before EU recognition, OVs should request that the FBO’s HACCP-based procedures are reviewed and amended in advance of the changes. In addition, OVs should require information from the FBOs on the destination plants for the category 3 material and inform their APHA local office (with the relevant VA copied) that the establishment will be sending NR status category 3 material (previously classed as cat 1) to these destinations. This will enable APHA to discuss with the receiving ABP companies the implications of accepting the material, as they will be unable to export or supply businesses exporting to the EU. It is estimated that many ABP companies may not be interested in collecting this material and therefore FBOs should be advised to discuss with them before making any processing changes and ask for written confirmation that NR category 2 or 3 material (previously classed as cat 1) would still be uplifted. OVs in these establishments will be unable to sign SHAs or EHCs for the EU or NI for those commodities where the EHC/SHA specifically request adherence to the EU BSE rules.

For establishments wishing to maintain CR status controls during the interim period, their HACCP-based procedures will not need to be amended. OVs should ensure CR controls remain in place, and while CR controls will no longer be a legal requirement, OVs can still enforce when FBOs deviate from their own procedures. When CR controls are adequately maintained, OVs should be able to issue SHAs and EHCs if applicable. CR controls will include ensuring over thirty-months (OTM) carcases are identified with a red stripe and sent only to cutting plants (CPs) authorised for the removal of OTM vertebral column. CPs receiving these carcases will be expected to operate as per their agreed procedures, which will include treating those carcases as containing SRM and deviations from the procedure can be enforced by FSS staff.

**Field Staff** are required to:

* Note the contents of the Action Note, plant attending OVs to ensure that the Action Note is read by all FSS staff, and this is noted in the Action/ Information Log.
* Discuss the contents of the Action Note with those FBOs processing bovines in their attending plants and enquire whether they will choose to continue applying CR controls until the EU recognises our NR status.
* If the plant intends to apply NR controls and SRM definitions, inform your VA and ensure the FBO amends HACCP and SOPs before any changes. Enquire about Cat 2 and 3 destinations and inform APHA.
* Note that a Teams meeting with Scottish FBOs has been scheduled for Monday 9 June 2025 at 2 pm.
* Print a copy of this note for the plant file.

**This Action Note will be**:

* Uploaded to the Action Note Live Folder and Operations tracker log on SharePoint.
* Forwarded to Website mailbox ([websiteteam@fss.scot](mailto:websiteteam@fss.scot)) for publication on our website.

The Action Note will remain live until either incorporated in the SMOC or revoked.

Copies of the live and revoked Action Notes can be found on [SharePoint](http://sgsharepoint16/sites/FSS/ops/_layouts/15/start.aspx#/SitePages/Home.aspx?RootFolder=%2Fsites%2FFSS%2Fops%2FShared%20Documents%2FSMOC%2FSMOC%20%2D%20Action%20Notes&FolderCTID=0x012000BE19D936AC67B044AE90EEDEB6E4B48F&View=%7B4874B561%2DB608%2D40C4%2DBE22%2DC4C905F4C7BD%7D).

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| **Action Note drafted by** | **Action Note agreed by** | **Published** | **Revoked** |
| Albert Conca | Elena McWatt | Chris Quick |  |
| 28/05/2025 | 06/06/2025 | 06/06/2025 |  |

## **Annex 1 – SRM definition for CR and NR status**

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## **Action/Information Log**

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| Action Note Number: 2025-06-01 | | |
| SMOC Chapter: Chapter 2.7 SRM Controls | | |
| Implementation Date: 09-06-2025 | | |

***(Signing the charter below certifies that the Action/Information has been read and understood)***

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