

USE OF OFFAL IN BABY FOODS

1. Thank you for sending me a copy of your minute of the 28th. February. I have asked the BMMA for information on usage of offals in meat products, and I am awaiting a reply. I am not too optimistic that much data exists.
2. The Southwood Report recommended that baby foods manufacturers should not use ruminant offal and thymus in baby foods. This was interpreted as any offal listed in Schedule 2 Part 2 of the Meat Product Regulations. The Committee, in effect, are advising the Ministry that any offal which carries any risk of transmitting the BSE agent to baby foods should not be used in their manufacture. The offal listed in Part 2 Schedule 2 of the MPSEFR is by no means exhaustive, and other organs exist e.g. endocrine and pituitary glands, which are high 'risk' from the point of view of the presence of BSE or scrapie agent. Therefore I feel that any regulations should widen the scope of the definition of offal to include any of these organs not mentioned in Part 2.
3. It also seems logical that the prohibition should be extended to include any products derived from these banned offal. The BSE and scrapie agent have such a high heat resistance, that normal processing conditions would not inactivate them. Therefore, bone broth or gelatine should not be derived from bones, which contain spinal cord, for example.
4. As far as the parts of the animal contained in Part 1 of Schedule 2 of the MPSEFR, the CMO has stated that liver, heart and kidney are safe to use in baby foods. No consideration has been given to the other parts of the animal listed such as tongue, tailmeat, diaphragm and pancreas, but I cannot see any reason as regards their risk why they should be specifically banned. Subject to the CMO's approval, their use should be permitted even though in practice they are not used.
5. I had some reservations about tailmeat because of its close association with the spinal cord. However, I have consulted CVL on this issue. Their advice is fairly reassuring, and indicates that the spinal cord ends before the tail begins. The lining of the spinal cord (dura mata) and its associated spinal fluid does extend into the beginning of the tail up to the fourth coccygeal vertebrae. Abattoir practice is to remove the tail directly after skinning, when the animal is hanging hind quarters upwards at a point which is normally around the end of the dura mata. In removal of the tail, the lining and fluid would tend to remain with the rest of the carcass. There are also a lot of nerve endings associated with the rest of the tail which have associated cerebral spinal fluid, but this is no different to the nerves and fluid associated with all skeletal muscle which are connected to the spinal column.

6. I would suggest the following wording as a basis for the definition of offal in the proposed regulations to assist the lawyers in their drafting:-

"For the purposes of these Regulations, offal means those parts of the animal listed in Part 2 Schedule 2 of the MPSFPR, thymus and any other parts of the animal not defined as meat in the MPSFPR, or any products derived from them".

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