

21 August 2006

Mr Michael Webb
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**PRACTICE AND QUALITY
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Dear Mr Webb

European Commission's draft proposal for amendments to the Animal By-Products Regulation (EC) No 1774/2002

The Royal Pharmaceutical Society of Great Britain (RPSGB) is the professional and regulatory body for pharmacists in England, Scotland and Wales. It also regulates pharmacy technicians on a voluntary basis, which is expected to become statutory under anticipated legislation. The primary objectives of the Society are to lead, regulate, develop and represent the profession of pharmacy.

The RPSGB welcomes the opportunity to participate in the consultation process.

Articles 4, 5, 6

Some animals may be carriers but not yet identified, like "bird flu". Should all animals be regarded as suspect carriers?

Sheep, especially lambs, in remote areas are buried on site. Is this sufficiently covered under the proposed Regulation? Does the proposed Regulation cover animals that die in transit from one area to another?

Article 5 (f) – Horn crafted articles are usually made from discarded horn (eg deer). Is waste from crafting horn covered under the Regulation as the animal concerned may or may not be a carrier of disease. It is impossible to tell.

It is noted that the EU "still" is insistent on regarding horses in the UK as farmed animals and is now concessionary as "pet" status. We do not understand where pharmacy fits in with these proposals.

We hope that these comments are useful and that the review of livestock movement rules leads to improved identification and traceability.

Yours sincerely

Robert A Clayton
Head of Practice