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Table 3-12
Annual Number of CWD-Infected Animals Harvested

Species	Disease Prevalence ^a	Population Size ^b	Annual Harvest Rate ^b	Infected Animals Harvested per Year ^c
Mule deer	4.9%	2×10^6	20-25%	24,500
White tail deer	2.1%	3.2×10^7	25%	168,000
Rocky Mountain Elk	0.5%	1.0×10^6	15-20%	1,000
Total				194,000

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3024*Notes:*

a Refers to the estimated prevalence of CWD among animals harvested from the CWD endemic areas of north central Colorado and southeastern Wyoming (Miller 2000).

b Source (Rocky Mountain Elk Foundation 1997); Lloyd Floyd, personal communication; Quality Deer Management Association's.

c Computed using the upper bound annual harvest rate in the fourth column from the left

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Number of cervid ID₅₀s per case: Because the prevalence rate has been estimated on the basis of post mortem evaluation of brain tissue, they may reflect only those animals that have advanced disease. We assume that there are 10,000 cervid oral ID₅₀s per case of disease.

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Fraction of animals rendered: Only a small portion of cervids harvested for human consumption are likely to be rendered at all. Those that are rendered are most often processed by an independent facility that handles only prohibited rendered material (Franco 2001). We assume that 10% of the harvested cervids are rendered.

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The species barrier: As noted in Section 2.3.4, the species barrier for the transmission of CWD from cervids to cattle appears to be between 10^5 and 10^{12} . We conservatively assume that the species barrier value is 10^5 .

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Proportion of infectivity surviving rendering and administered to cattle: As described in Section 3.3.3, under present-day conditions (*i.e.*, with the adoption of the feed ban), total cattle population exposure to infectivity is approximately 0.1% as great as the amount of infectivity in animals sent to rendering.

3043
3044

Total Cattle Population Exposure: Under present-day conditions, total exposure to CWD is estimated to amount to no more than 2 cattle oral ID₅₀s per year, or approximately 0.2 cattle

3045 oral ID₅₀s per month. As noted above, this estimates reflects several assumptions that are
3046 potentially very conservative. The true level of exposure is perhaps much lower.

3047

3048 **3.3.5 Chronic Wasting Disease: Lateral Transmission**

3049 Because the potential impact of this source is insignificant (see Section 2.3.5), we do not
3050 quantitatively model its impact on the prevalence of BSE in the U.S. cattle population or its
3051 contribution to contamination of the U.S. food supply.

3052

3053 **3.3.6 Mink**

3054 As is the case with cervids, FDA regulations prohibit the administration to cattle of feed
3055 fortified with protein derived from mink, although this ban may not completely prevent such
3056 exposures. This section describes our development of an upper bound estimate on this exposure,
3057 which we estimate to be on the order of 1 cattle oral ID₅₀ annually. The true value is likely to be
3058 substantially lower, and could be zero. Our methodology is similar to that used to evaluate the
3059 exposure risk associated with CWD. Annual cattle exposure to TME attributable to consumption
3060 of mink-derived protein is the product of the 1) number of diseased animals harvested, 2) the
3061 number of mink ID₅₀s per animal slaughtered, 3) the fraction of animals rendered, 4) the inverse
3062 of the species barrier, and 5) the proportion of infectivity surviving rendering and administered to
3063 cattle.

3064

3065 *Number of diseased animals harvested:* A total of 2.6 million mink are harvested in the
3066 U.S. annually (U.S. Department of Agriculture 2001b). The prevalence of disease is unknown.
3067 We assume that the prevalence of clinical and pre-clinical disease are both similar to the
3068 corresponding rates for scrapie, or approximately 0.1% and 10%, respectively. Hence, we
3069 estimate that there are 2,600 clinical animals and 260,000 pre-clinical animals slaughtered each
3070 year.

3071

3072 *Number of mink ID₅₀s per case:* As we estimated for scrapie, we assume that pre-clinical
3073 animals harbor an average of 600 mink ID₅₀s, whereas clinical animals harbor 10,000 mink ID₅₀s.

3074

3075 *Fraction of animals rendered:* We estimate that 60% of slaughtered mink are rendered
3076 (Platt 2001).

3077

3078 *The species barrier:* Experimental transmission of TME from the Stetsonville outbreak
3079 to cattle via i.c. inoculation resulted in animals developing a fatal spongiform encephalopathy
3080 (Marsh 1991), although it appeared to be distinct from BSE. As with CWD, we assume that the
3081 species barrier for TME transmitted to cattle is 10^5 .

3082

3083 *Proportion of infectivity surviving rendering and administered to cattle:* As in the case of
3084 CWD, we assume that this value is now 0.1%.

3085

3086 *Total infectivity reaching cattle:* Total infectivity reaching cattle from clinical TME
3087 cases amounts to 0.2 cattle oral ID_{50} s annually, while the corresponding value for pre-clinical
3088 animals is 0.9 cattle oral ID_{50} s. The total amounts to 1 cattle oral ID_{50} per year, or approximately
3089 0.1 cattle oral ID_{50} s per month. Because this source exposes cattle to substantially less infectivity
3090 than does scrapie (as modeled in Section 3.3.3), we do not quantitatively model its impact on the
3091 prevalence of BSE in the U.S. cattle population or its contribution to contamination of the U.S.
3092 food supply.

3093

3094 **3.3.7 Pigs**

3095 Because the potential impact of this source is insignificant (see Section 2.3.7), we do not
3096 quantitatively model its impact on the prevalence of BSE in the U.S. cattle population or its
3097 contribution to contamination of the U.S. food supply.

3098

3099 **3.3.8 Poultry**

3100 Because the potential impact of this source is insignificant (see Section 2.3.8), we do not
3101 quantitatively model its impact on the prevalence of BSE in the U.S. cattle population or its
3102 contribution to contamination of the U.S. food supply.

3103

3104 **3.3.9 Recycled Waste**

3105 Because the potential impact of this source is insignificant (see Section 2.3.9), we do not
3106 quantitatively model its impact on the prevalence of BSE in the U.S. cattle population or its
3107 contribution to contamination of the U.S. food supply.

3108

3109 **3.4 Alternative Scenarios Evaluated Using the Simulation Model**

3110 The alternative scenarios evaluated using the simulation model fall into three categories.
3111 First, we evaluate the plausibility of the model's output by comparing the predicted number of
3112 clinical BSE cases to the observed number of clinical BSE cases between 1985 and 2000 in
3113 Switzerland (Section 3.4.1). Second, we evaluate the potential for two sources of infectivity
3114 (spontaneous disease and cattle imported from the UK during the 1980s) to have introduced BSE
3115 into the U.S. prior to the implementation of regulations meant to limit its spread (Sections 3.4.2
3116 and 3.4.3). Finally, we evaluated the extent to which additional risk management actions
3117 (implementation of a UK-style specified risk material (SRM) ban, or a ban on the rendering of
3118 cattle that die on the farm) reduce the potential spread of BSE among cattle and potential human
3119 exposure (Sections 3.4.4 and 3.4.5). Section 4 in Appendix 2 to this report details the parameter
3120 file changes made for each of these scenarios.

3121

3122

3123 **3.4.1 Switzerland**

3124 Because there has never been a controlled experiment to quantify the impact of
3125 introducing BSE into a country, a true validation of the simulation model described in this report
3126 is not possible. Instead, this section describes an evaluation of the model's plausibility that
3127 involves modeling the small BSE outbreak observed in Switzerland following the introduction of
3128 BSE infectivity from the UK. Working with experts in Switzerland, we identified appropriate
3129 parameter values in order to characterize the herd population dynamics, conditions, practices, and
3130 procedures in that country. The Switzerland scenario reflects changing conditions over time. In
3131 addition to specifying conditions at the beginning of the simulation (1986), the scenario also
3132 reflects changes to these conditions in 1990, 1993, 1996, 1998, and 2001.

3133

3134 This scenario, referred to as "Swiss Best Guess", reflects our best estimate of conditions
3135 in Switzerland during the period simulated. After describing this scenario, we outline two
3136 modifications ("Swiss Alternative 1" and "Swiss Alternative 2") that were developed after
3137 comparing the results of Swiss Scenario to empirical data. Swiss Alternative 1 and Alternative 2
3138 were developed to see whether modest changes to our initial assumptions (modifications that are
3139 well within the range of plausibility given our underlying uncertainty) could yield results that are
3140 more consistent with these empirical findings.

3141

3142 Swiss Best Guess

3143

3144 *1986:* The Switzerland scenario begins in 1986, the year we assume that 67 newly
3145 infected Swiss female dairy cattle were incubating BSE (Doherr 1999). Thirty of these cattle are
3146 assumed to be 25 months of age and the remaining 37 are assumed to be 26 months of age.

3147

3148 At the same time, the Switzerland scenario assumes that feed containing 4,000 cattle oral
3149 ID₅₀s was imported. This assumption is based on information that three tons of MBM were
3150 imported from the UK between 1985 and 1989. We assume that during that period, MBM from
3151 Britain was contaminated with BSE. In particular, we assume that the three tons of MBM
3152 imported from Britain represented rendered protein from three cattle, each of which harbored
3153 between 800 and 2,000 cattle oral ID₅₀s. We assume that the three tons of MBM were used to
3154 supplement feed at a concentration of 5% and was therefore distributed as part of a total of 60
3155 tons of feed. Assuming that cattle consume 30 pounds of feed a day (3% of their weight) and that
3156 farms purchase feed in lots sufficient to last them 30 days, the 60 tons (120,000 pounds) of feed
3157 would be divided among 133 cattle (*i.e.*, 120,000 pounds ÷ (30 pounds/cow-day × 30 days)).

3158

3159 Differences between the base case and the Switzerland scenario in 1986 include the
3160 following. First, the misfeeding rate is assumed to be 15%, considerably higher than the 1.6%
3161 misfeeding rate in the base case. The assumption of a substantially higher misfeeding rate is
3162 based on the observation that a substantial proportion of the farms in Switzerland raise both
3163 livestock that can consume prohibited feed and livestock that are restricted to non-prohibited
3164 feed. For example, farm census data suggest that nearly 67% of the poultry in Switzerland are
3165 raised on farms that also raise cattle (Heim 2001). For hogs, the corresponding proportion is 59%
3166 (Heim 2001).

3167

3168 Second, the Switzerland scenario assumes that most rendering systems in use in 1986 in
3169 Switzerland used batch processing technology, which normally reduces infectivity by a factor of
3170 1,000 (*i.e.*, 3 logs). However, because use in Switzerland typically did not conform to the
3171 133°C/20 minutes/3 bars of pressure minimum treatment standard, we assume that the majority of
3172 rendering facilities achieved only 2 logs of infectivity inactivation.

3173

3174 Finally, the Switzerland scenario reflects the absence of a feed ban in 1986.

3175

3176 *1990:* In December, 1990, Switzerland enacted a feed ban and a ban on the rendering or
3177 use as human food of SRM, including brain, spinal cord, dorsal root ganglia, gut, lung, eyes, and
3178 AMR meat⁵. The structure of the MBM and feed production industries made failures of the ban
3179 on the use of SRM in animal feed more likely. In particular, a substantial portion of the
3180 prohibited feed was produced by mixed feed producers. We assume that these producers
3181 mislabeled or failed to properly label 10% of their prohibited feed and that contamination
3182 occurred during production of 20% of the prohibited feed. We also note that increased efforts to
3183 keep specified risk materials (SRM) out of the human supply may have increased pressure to
3184 divert the flow of this material into MBM and ultimately into animal feed.

3185

3186 *1993:* By 1993, rendering practices improved. We assume that at that time, all renderers
3187 complied with the 133°C/20 minutes/3 bars of pressure standard, and hence that all rendering
3188 achieved a 3.1 logs of infectivity reduction (a factor of approximately 1,260).

3189

3190 *1996:* Changes in farming practices also helped reduce the spread of BSE infectivity.
3191 These changes included reduced misfeeding of prohibited rations to cattle (we assume this rate
3192 was 0.1%) and eliminating the rendering of cattle that had died on the farm.

3193

3194 *1998:* In 1998, slaughter facility practices further improved with an increased effort to
3195 remove spinal cords after splitting. We assume the spinal cord was removed 99.9% of the time.

3196

3197 *2001:* Finally, in January, 2001, Switzerland outlawed the practice of feeding MBM to
3198 any farm animal⁶. This move essentially eliminated the possibility of misfeeding animals. In
3199 addition, Switzerland prohibited the feeding of blood meal to cattle.

3200

3201 Swiss Alternative 1

3202

3203 This scenario is the same as the Swiss Best Guess scenario except that we divided the
3204 assumed import of 4,000 cattle oral ID₅₀s equally over three months at the beginning of the

⁵ The November, 2001 version of this report assumed that this change occurred in January, 1990, rather than in December of that year. We revised this assumption in response to information from the Swiss Federal Veterinary Service Swiss Federal Veterinary Service (2002). Memo (March 18) to the Harvard Center for Risk Analysis: "Comments on the Harvard study: Evaluation of the potential for Bovine Spongiform Encephalopathy in the United States".

⁶ The November, 2001 version of this report assumed that this change occurred in January, 1999. We revised this assumption in response to information from the Swiss Federal Veterinary Service Ibid..

3205 simulation period (1,333 ID₅₀s per month) rather than assuming that it was all imported in the
3206 same month. Doing so substantially increases the number of initial infections that occur at the
3207 beginning of the simulation because the original simulation assumed that these 4,000 ID₅₀s were
3208 imported in a single month and divided among 133 cattle. Because the size of the exposed group
3209 was relatively small for that quantity of infectivity, virtually all the animals received more than
3210 2.0 susceptibility-adjusted ID₅₀s, hence “wasting” infectivity. By dividing the delivery over three
3211 months, a total of 399 animals were exposed, hence resulting in a greater number of initial
3212 infections.

3213

3214 Swiss Alternative 2

3215

3216 This scenario is the same as the Swiss Best Guess Scenario except that a total of 8,000
3217 ID₅₀s were introduced into cattle feed in 1986 (rather than 4,000), with the import of this
3218 infectivity uniformly distributed over a period of 6 months (1,333 ID₅₀s per month).

3219

3220 **3.4.2 Spontaneous Disease as a Potential Source of Infectivity in the U.S.**

3221 This scenario is the same as the spontaneous disease scenario described in Section 3.3.1
3222 except that it also assumes the absence of the 1997 feed ban. We assume that prior to the
3223 adoption of the 1997 feed ban, 65% of the MBM produced by renderers that processed cattle
3224 went to animal feed manufacturers, while the remaining 35% was either exported or otherwise
3225 allocated to some other use that posed no risk of exposing cattle to BSE infectivity. We further
3226 assume that 98% of the feed produced by feed manufacturers was sent to farms and that only 2%
3227 was allocated to uses that posed no exposure risk to cattle.

3228

3229 **3.4.3 Cattle Imported into the U.S. from the UK During the 1980s**

3230 This scenario evaluates the potential consequences of U.S. imports of cattle from the UK
3231 during the 1980s prior to the imposition of an import ban in 1989. Of particular concern has been
3232 the import 334 cattle from the UK and 162 cattle from the Republic of Ireland during that period
3233 because those animals may have been infected with BSE. The vast majority of the cattle
3234 imported from Ireland were regarded as posing a negligible risk because they were imported
3235 before 1985 and hence before the prevalence of BSE rose sharply in the UK (Section 3.1.1 in
3236 (European Union Scientific Steering Committee 2000d)). Of the animals imported from UK,
3237 USDA has determined that 161 were disposed of in a manner that eliminates the possibility that

Section 3

3238 they could have either contaminated the human food supply or lead to the exposure of additional
3239 animals in the U.S. to BSE. However, USDA has not been able to conclusively determine that
3240 the other 173 animals posed no risk of contaminating either human food or animal feed. This
3241 scenario characterizes the potential impact these cattle may have had on the presence of BSE in
3242 the U.S.

3243

3244 For each of the 173 animals that may have posed an exposure risk, USDA has determined
3245 from Department records and from interviews year of birth, animal type (beef or dairy), gender,
3246 age when exported to the U.S., and age when last seen. Using this information, we have
3247 computed the probability that the animal was infected and the distribution of values for the
3248 animal's total infectivity load. Probabilistically summing these distributions over all 173 cattle
3249 yielded a distribution of ID₅₀s imported into the U.S. For this scenario, we assume that all
3250 infectivity was imported in 1980. Appendix 5 describes our methodology for developing the
3251 imported infectivity distribution.

3252

3253 To determine the impact of these imports, we simulated the introduction of various
3254 amounts of infectivity in cattle feed into the U.S. Amounts simulated were 0.1, 1.0, 5.0, 10.0, and
3255 50.0 cattle oral ID₅₀s. The simulation started in the year 1980 and ran through the year 2010.
3256 The following assumptions were made for each time period over that 30-year duration.

3257

3258 *1980:* We assume that at the beginning of the simulation, there was no feed ban in place.
3259 In addition, we assume that for cattle between the ages of 12 and 23 months, mis-splits occurred
3260 with 5% probability, AMR was used 20% of the time, and spinal cords were removed with 50%
3261 probability (regardless of AMR usage). The same assumptions apply to animals 24 months of
3262 age and older, except for the mis-split probability, which is assumed to have been 8%. The
3263 fraction of spinal cord and DRG that contaminate AMR meat also differs somewhat from the
3264 baseline assumptions (see Appendix 2 for details). Finally, we assume that air-injected
3265 pneumatic stunning was used for 15% of all animals.

3266

3267 *1993:* We assume that in 1993, the proportion of animals processed in plants using AMR
3268 increased from 20% to 40%.

3269

3270 *1997:* The simulation reflects implementation of the feed ban in 1997. However, we
3271 assume that at this time, the mislabeling rate for prohibited and mixed renderers was 10% (instead

3272 of the base case value of 5%). We also assume that the contamination rate for mixed renderers
3273 was 28% (instead of the base case value of 14%). For prohibited and mixed feed producers, we
3274 assume that the mislabeling rate was 10% (instead of the base case value of 5%). The probability
3275 of contamination for mixed feed producers is assumed to have been 32% (instead of the base case
3276 value of 16%).

3277

3278 *1999*: We assume conditions returned to those characterized by the base case
3279 assumptions.

3280

3281 **3.4.4 Risk Management: Specified Risk Materials (SRM) Ban**

3282 The SRM ban eliminates the potential for the following tissues to contaminate either
3283 human food or rendered material that might be used in feed: brain, spinal cord, gut, eyes, and
3284 AMR meat products. The SRM ban also eliminates the practice of rendering animals that die on
3285 the farm.

3286

3287 **3.4.5 Risk Management: A Ban on Rendering Animals that Die on the Farm**

3288 Animals that die on the farm are not rendered. We assume that any infectivity in these
3289 animals will not contaminate either human food or rendered material that may be used as animal
3290 feed.

3291

3292 **4 Results**

3293 This section highlights key results of the analyses in this report. Complete results can be
3294 found in Appendices 3A and 3B. Appendix 3C describes how we have summarized the results
3295 generated by the simulation using tables and figures.

3296

3297 Section 4.1 discusses the modeled impact of importing ten BSE-infected animals into the
3298 U.S. under present-day conditions (*i.e.*, the base case as described in Section 3.1). The model
3299 predicts that such an introduction would be unlikely to result in more than a handful of new cases
3300 of BSE, that little infectivity would be likely to reach the U.S. human food supply, and that BSE
3301 would likely be cleared from U.S. in less than 20 years.

3302

3303 Section 4.2 describes the results of the sensitivity analyses outlined in Section 3.2. In
3304 particular, we describe how altering these assumptions influenced the predicted number of new
3305 BSE cases and the amount of infectivity potentially available for human consumption following
3306 introduction of ten infected animals. The sensitivity analysis results indicate that the predicted
3307 number of additional cattle infected is particularly sensitive to the assumed proportion of
3308 prohibited MBM that is mislabeled and the assumed proportion of properly labeled prohibited
3309 feed that is incorrectly fed to cattle. Predicted human exposure is likewise sensitive to these
3310 parameters. It is also sensitive to the assumed number of ID₅₀s in the carcass of an animal with
3311 full blown BSE, and to a lesser extent to several parameters related to the slaughter process.

3312

3313 The results indicate that both the spread of BSE and potential human exposure are
3314 proportional to the number of infected cattle introduced into the U.S. We also investigate the
3315 impact of importing contaminated feed.

3316

3317 Section 4.3 describes the predicted impact of different sources of infectivity and
3318 evaluates both their plausibility and potential for BSE infectivity to spread to cattle or to be
3319 available for potential human exposure. The simulation model predicts that under current
3320 conditions (*i.e.*, base case assumptions) cross species transmission of scrapie or spontaneous BSE,
3321 if they can occur, would produce one to two new cases of BSE per year in the U.S. and little
3322 infectivity to humans. Simulations investigating scenarios in which different numbers of infected
3323 cattle are imported into the U.S. indicate that both the spread of the disease among cattle and
3324 potential human exposure are roughly proportional to the number of infected animals imported.

Section 4

3325 In all cases tested (up to 500 infected animals imported), the prevalence of BSE decreases over
3326 time and tends to be eventually eliminated from the U.S.

3327

3328 Finally, Section 4.4 describes the model's predictions for the scenarios outlined in
3329 Section 3.4. The predictions made by the model for the Switzerland scenario are sufficiently
3330 similar to those observed to lend the model credibility. Our analysis of potential imports of BSE-
3331 infected animals from the UK into the U.S. during the 1980s shows that it is unlikely although not
3332 impossible that these imports introduced BSE into the U.S. cattle population. Finally, the
3333 simulation's predictions suggest that two risk management measures (a specified risk material
3334 ban or a ban on the rendering of cattle that die on the farm) would each further improve defenses
3335 against the spread of BSE in this country.

3336

3337 Section 4.5 concludes our report with a summary of the main findings and the
3338 implications of BSE for both animal and public health in the U.S.

3339

3340 Before proceeding, we note that many of the simulation results are "right skewed,"
3341 meaning that the average value often exceeds the median (50th) percentile and can sometimes
3342 even exceed the 95th percentile. A right-skewed distribution arises when the lower end of the
3343 distribution is bounded (in our case, all of the quantities must be non-negative), and rare events
3344 can cause very large outcome values. For example, the probability that the brain of a BSE-
3345 infected animal will be selected for potential human consumption is very low because there are
3346 few sick animals and few brains harvested for human consumption. However, if this event does
3347 occur, it makes a substantial quantity of infectivity available for potential human consumption. If
3348 this event occurs only five times in 5,000 simulation runs, the arithmetic mean for the number of
3349 cattle oral ID₅₀s available for human consumption from brain would exceed this outcome's value
3350 for 4995 of the 5,000 runs (*i.e.*, zero). For this reason, we report key percentile values for each
3351 outcome, in addition to the arithmetic mean. Appendix 3C further describes how we have
3352 reported the simulation results. The results discussion focuses on mean and median values to
3353 characterize the central tendency for each quantity, and the 95th percentile to characterize a
3354 quantity's extreme (although not worst possible) case value.

3355

3356 **4.1 Base Case**

3357 The assumptions that define the base case correspond to contemporary conditions in the
3358 U.S., including all risk management actions taken by government and industry. Appendix 1,
3359 Section 2 details the corresponding parameter values. Because BSE has not been found in the
3360 U.S., the base case is evaluated by assuming the import of ten BSE-infected animals. Such an
3361 introduction is considered unlikely because of the ban on importing ruminants from countries
3362 known to have BSE. However, this approach allows characterization of the way in which
3363 infectivity could spread to animals or humans should the disease be introduced.

3364

3365 The introduction of ten infected animals demonstrates the robustness of U.S. regulations
3366 and practices against the establishment of BSE (full results can be found in Section 1 of
3367 Appendices 3A and 3B). On average, there are fewer than five new cases of BSE, with a 75%
3368 chance that there will be no more than one new case, and at least a 50% chance that there will be
3369 no new cases at all. The extreme case (the 95th percentile of the distribution) predicts 16 new
3370 cases. The simulation predicts an average of 39 cattle oral ID₅₀s potentially available for human
3371 consumption during the 20-year period following the import of the infected animals, with a 95th
3372 percentile value of 180 cattle oral ID₅₀s. In all cases, the disease is quickly eliminated from the
3373 U.S., with virtually no chance that there are any infected animals 20 years following the import of
3374 infected animals.

3375

3376 Potential human exposure routes include consumption of brain (24% of the total on
3377 average), contaminated AMR product (51%), beef on bone (12%), intestine (2%), and spinal
3378 cord (10%). Even these estimates are likely to overstate true human exposure because they
3379 represent the amount of infectivity *presented* for human consumption but do not take into account
3380 waste or actual consumption rates. For example, the reported quantity for potential exposure of
3381 ID₅₀s in beef on bone potential reflects the presence of spinal cord and dorsal root ganglia in a
3382 fraction of cuts like T-bone steaks. The spinal cord may never be consumed but is still available
3383 for potential human exposure. Likewise, not all bovine brain removed for human consumption is
3384 actually eaten by humans. Some is not purchased at the retail level and some is not consumed
3385 even when purchased. These issues are also relevant to the other tissue categories. For these
3386 reasons, our estimates of potential human exposure are likely to overestimate true exposure to
3387 infected BSE tissues.

3388

3389 To further characterize the resilience of the U.S. agriculture system, we simulated the
3390 impact of introducing 1, 5, 20, 50, 100, 200 or 500 infected cattle (see Section 4.3.3).

3391

3392 **4.2 Sensitivity Analyses**

3393 This section describes how the use of worst case assumptions in the scenario
3394 hypothesizing the introduction of ten infected cattle into the U.S. influences the findings detailed
3395 in Section 4.1.

3396

3397 As described below, we find that with three exceptions, the model continues to predict
3398 with a high level of certainty that the U.S. agricultural system remains robust against the spread
3399 of disease unless worst case values are assigned to multiple parameters simultaneously. In
3400 particular, the model's predictions change most dramatically if parameters in the feed production,
3401 MBM production, and feed administration practices parameter group are simultaneously assigned
3402 worst case values. Because the worst case values are unlikely to be correct for multiple
3403 parameters simultaneously, the sensitivity analysis suggests that the findings from Section 4.1 are
3404 reasonable. Nonetheless, it would be helpful to develop better information for those parameters
3405 that do contribute most substantially to the uncertainty of our findings.

3406

3407 Appendix 3A, Section 2 summarizes the results for each scenario (one table per set of
3408 assumptions evaluated). Appendix 3D summarizes the results for each quantity across all
3409 scenarios. The results in Section 3D clearly illustrate our finding that most alternative sets of
3410 assumption have virtually no impact on the simulation results. Moreover, simultaneously
3411 assigning worst case values to both the cattle demographic assumptions and the MBM
3412 production, feed production, and feeding practice assumptions has a far greater impact than any
3413 other alternative evaluated.

3414

3415 **4.2.1 Number of Additional Infected Cattle**

3416 As noted in the introduction of Section 3.2, using the base case assumptions results in an
3417 R_0 value that is virtually certain to be less than unity, indicating that the prevalence of BSE would
3418 decrease over time after being introduced into the U.S. Figure 4-1 illustrates how each alternative
3419 worst case assumption individually influences the predicted number of additional new cases of
3420 BSE over a 20-year period after the introduction of ten infected animals.

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3454

Figure 4-1 can be interpreted by considering an approximate correspondence between the number of additional infected cattle and the value of R_0 . Roughly speaking, if R_0 is unity (*i.e.*, each infected animal infects one additional animal), we would expect the number of additional infected animals to be the product of the number of infection cycles and the number of initial animals infected. The infection cycle is the duration between the infection of an animal and that animal's death, at which point the cycle can initiate the next round of infections. The longest this period can be is the length of the incubation period plus the amount of time the animal remains clinical before dying. The average incubation duration is 52 months, while the average time the animal remains clinical is four months. Hence, the average incubation cycle is 56 months long. As a result, there are approximately four full infection cycles per 20 year period, indicating that if R_0 is unity, there should be approximately 40 additional infected animals following the introduction of ten initial infected animals.

We note that this estimate is likely to be conservative because the true infection cycle duration is likely to be less than the average incubation period. For example, in the base case, more than half the infected animals died at slaughter (8.3), rather than on the farm (6.0). The 8.3 animals that died at slaughter produced 1,600 ID_{50} s, far less than would be expected if the animals had survived through the entire incubation period. Hence, an R_0 equal to unity should probably result in more than 40 additional infected animals. Nonetheless, we will use the value of 40 additional animals for the purpose of evaluating the sensitivity analysis findings.

The results illustrated in Figure 4-1 indicate that with the exception of three parameters (3.2.3.1 – Render reduction factor, 3.2.3.5 – Render mislabeling, and 3.2.3.6 – Misfeeding), use of worst case assumptions in place of base case assumptions produces R_0 values that remain below unity with at least 95% probability. Even for these last three parameters, use of worst case values results in R_0 values exceeding unity with less than 25% probability. For example, for the worst case assumptions for misfeeding, the number of additional infected cattle has a 50th percentile value of 1 ($R_0 < 1$), and a 75th percentile value of 16 ($R_0 < 1$). Only the 95th percentile, which is 420, implies an R_0 value exceeding unity. (The mean value is 64). The results also show that with the exception of the render reduction factor parameter, the render mislabeling parameter, and the misfeeding parameter, none of the worst case assumptions substantially change the results distribution, when compared to the base case (first distribution on left side of Figure 4-1).

3455

3456 Figure 4-2 illustrates the impact of assigning worst case values to multiple parameters
3457 simultaneously. In this figure, worst case values were assigned simultaneously to all
3458 demographic parameters (Section 3.2.1), all slaughter process parameters (Section 3.2.2), and all
3459 MBM production, feed production, and feed administration parameters (Section 3.2.3).
3460 Assigning worst case values to all demographic parameters has a modest impact on the number of
3461 additional infected cattle. The 75th percentile value is 1 ($R_0 < 1$). At the 95th percentile, the
3462 number of additional infected cattle (48) slightly exceeds the cutoff we have estimated as
3463 corresponding to an R_0 of 1. Setting all slaughter process parameters to their worst case value has
3464 a similar modest impact on the number of additional infected cattle. Again, only the 95th
3465 percentile (43 additional infected cattle) corresponds to an R_0 value exceeding 1. Because the
3466 feed and MBM parameters include the three parameters that had the greatest univariate impact on
3467 the number of additional infected cattle (see Figure 4-1), it is not surprising that assigning worst
3468 case values to all the parameters in this set has a substantially greater impact on the number of
3469 additional infected cattle. Assigning worst case values to all of these parameters simultaneously
3470 results in an R_0 value exceeding unity at the 75th percentile.

3471

3472 The three rightmost box and whisker plots in Figure 4-2 illustrate the impact of assigning
3473 worst case values to two groups of parameters simultaneously. Assigning worst case values to
3474 the demographic parameters and to the slaughter process parameters simultaneously (Sections
3475 3.2.1 and 3.2.2) has only a modest impact on the predicted number of infected cattle.
3476 Simultaneously assigning worst case values to the slaughter process and MBM production, feed
3477 production, and feed practice parameters (Sections 3.2.2 and 3.2.3) has a somewhat more
3478 pronounced impact. The largest impact results when worst case values are simultaneously
3479 assigned to all the demographic parameters and to the MBM production, feed production, and
3480 feed practice parameters (Section 3.2.1 and 3.2.3). The predicted BSE spread that results is so
3481 large that the run time required to simulate this scenario made it impractical to generate 5,000
3482 iterations. Instead, the results reflect a total of 780 iterations. As the detailed results indicate (see
3483 Section 2.5.5 in Appendix 3A), with these assumptions the spread of BSE is consistent with an R_0
3484 value that exceeds unity with between 25% and 50% probability. Moreover, the degree to which
3485 R_0 can exceed unity in these cases is substantial.

3486

3487 We did not simulate the scenario in which all parameters are simultaneously assigned
3488 their worst-case values for three reasons. First, the results described in the preceding paragraph

3489 indicate that assigning worst case values to two of the three sets of parameters (demographic
3490 assumptions and MBM production, feed production, and feed practice parameters) is sufficient to
3491 change the predicted behavior of the agricultural system. Second, the extended run time (250
3492 hours on a 3 GHz Windows-compatible PC) needed to generate 780 iterations for this scenario
3493 makes testing an even more extreme scenario appear to impractical. Finally, the probability that
3494 the worst case values are valid for all parameters seems to be remote.

3495 **4.2.2 Infectivity in Food Available for Human Consumption**

3496 Figures 4-3 and 4-4 illustrate the results for the univariate and multivariate sensitivity
3497 analyses conducted for the estimated number of ID₅₀s in food available for human consumption.
3498 Figure 4-3 shows that, as with the number of new infected cattle (Section 4.2.1), use of a worst
3499 case assumption for any individual parameter has in most cases a limited impact on potential
3500 human exposure to BSE-contaminated food. The only exceptions appear to be two of the
3501 influential parameters identified in Section 4.1 (3.2.3.5 – Render mislabeling, and 3.2.3.6 –
3502 Misfeeding) and the assumed number of ID₅₀s in the carcass of a full-blown BSE case (3.2.2.1a –
3503 ID₅₀s in carcass). In any case, total human exposure over the 20-year period of the simulation
3504 remains limited no matter which parameter is assigned its worst case value. Even when the most
3505 influential parameter (3.2.3.6 – misfeeding) is assigned its worst case value, the 95th percentile
3506 exposure is 1,000 ID₅₀s over 20 years. Lower percentile values were substantially less, with a
3507 75th percentile of 110 ID₅₀s and a median of 21 ID₅₀s.

3508

3509 Figure 4-4 illustrates the impact of assigning worst case values to groups of parameters
3510 simultaneously. The results indicate that the demographic parameters (3.2.1) have a limited
3511 impact on potential human exposure to BSE-contaminated food, but that collectively, both the
3512 slaughter process parameters (3.2.2) and the feed and MBM parameters (3.2.3) have a more
3513 substantial impact. Interestingly, although the combination of the slaughter process group
3514 parameters and feed and MBM parameters (3.2.2 and 3.2.3) increase the 5th, 25th, 50th, and 75th
3515 percentiles to the greatest extent (compared to the base case results), the combination of the
3516 demographic parameters and feed and MBM parameters (3.2.1 and 3.2.3) increase the 95th
3517 percentile, and consequently the arithmetic mean, to the greatest extent.

3518

3519 **4.3 Alternative Sources of Infectivity**

3520 We evaluate three potential sources of BSE in the U.S. Section 4.3.1 considers the
3521 impact of assuming BSE can develop spontaneously in cattle with an incidence rate that mirrors

3522 the age-specific incidence of CJD in humans. Section 4.3.2 considers the import of various
3523 numbers of infected cattle (1, 5, 20, 50, 200, and 500) and the import of contaminated feed
3524 (10,000 ID₅₀S). Finally, Section 4.3.3 considers the impact of assuming that scrapie can be
3525 transmitted from sheep to cattle. In all of these cases we assume the conditions specified in the
3526 base case hold.

3527

3528 **4.3.1 Spontaneous BSE**

3529 For this scenario, the model predicts an average of 27 infected animals over a 20-year
3530 period (95th percentile value of 38). It is predicted that only 2.7 animals, on average, would reach
3531 the clinical stage of the disease (95th percentile of 6). Virtually all animals that become infected
3532 develop the disease spontaneously, although maternal transmission and transmission caused by
3533 contaminated protein both make a small contribution. The simulation predicts that a mean of 73
3534 cattle oral ID₅₀S would be potentially available for human consumption (95th percentile value of
3535 220).

3536

3537 These results suggest that if this hypothesis is true, the disease is essentially endemic,
3538 with one-to-two cases occurring each year. Current agricultural practices and regulations (the
3539 feed ban) effectively check the spread of disease to other cattle but the disease cannot be
3540 eliminated because of its sporadic occurrence. The very low number of animals developing
3541 clinical signs would make detection using any method of surveillance very difficult.

3542

3543 **4.3.2 Imports**

3544 Figures 4-5, 4-6, and 4-7 respectively illustrate the relationship between the number of
3545 infected cattle imported and the number of new cases (*i.e.*, the number of cases in addition to the
3546 imported animals) during the 20 year period following the arrival in the U.S. of these imports,
3547 potential human exposure to BSE during this period, and the probability that BSE will be present
3548 in the U.S. at the end of the 20-year period. In Figures 4-5 and 4-6, the medians are connected by
3549 a solid line. The results indicate that all three outcomes increase linearly as a function of the
3550 number of infected cattle introduced. Most importantly, Figure 4-7 shows that even after the
3551 introduction of 500 cattle, the probability that BSE is still present in the U.S. after 20 years has
3552 dropped to approximately 10%. This finding suggests that the prevalence of BSE decreases over
3553 time regardless of how large the introduction is. That is, the value of R₀ remains less than one.

3554

3555 We note also that following the introduction of contaminated feed containing 10,000
3556 ID₅₀s, the median simulation predictions are: a total of 1,600 cattle infected over 20 years,
3557 potential human exposure to approximately 4,300 cattle oral ID₅₀s, and that after 20 years, an
3558 18% chance that BSE still remains in the U.S. By comparing these results to the median
3559 predictions in Figures 4-5 and 4-6, and the probability predictions in Figure 4-7, we can
3560 characterize the impact of importing contaminated feed in terms of the number of infected cattle
3561 that would have the same impact. Assuming the linear relationships in these figures hold at
3562 higher levels, the import of 10,000 ID₅₀s has the same impact on the spread of BSE (newly
3563 infected cattle) as importing 3,600 infected cattle. It has the same impact on human exposure as
3564 importing 1,100 infected cattle. Finally, it has the same impact on the persistence of the disease
3565 (*i.e.*, probability that it is present in the U.S. after 20 years) as the import of 820 infected cattle.
3566

3567 4.3.3 Scrapie

3568 This simulation evaluates the impact of assuming that scrapie contributes one cattle oral
3569 ID₅₀ to feed consumed by cattle each month. The simulation predicts that this contamination
3570 results in an average of 38 infected cattle over a period of 20 years (95th percentile estimate of
3571 64). The simulation also predicts that an average of about six animals would develop clinical
3572 signs during that period (95th percentile of 12). Current surveillance would be unlikely to detect
3573 this number of clinical cases. On average, the simulation predicts that approximately 100 cattle
3574 oral ID₅₀s would be available for potential human exposure during the 20 year period (95th
3575 percentile estimate of 290).
3576

3577 Because scrapie is assumed to contaminate cattle feed continually, the disease would
3578 essentially be endemic. Note that the simulation predicts that most new cases of BSE would arise
3579 directly from exposure to scrapie infectivity, although a small number of cases would result from
3580 exposure to contaminated ruminant protein that slips through the feed ban. Maternal transmission
3581 also makes a small contribution to the total.
3582

3583 We expect that the predictions made here are likely to overstate the true contribution of
3584 scrapie to BSE, as explained in Section 3.3.3. In brief, it is likely that the true species barrier is
3585 greater than the value of 1,000 used (efforts to transmit North American scrapie orally to cattle
3586 have produced negative results in all instances), and the prevalence of scrapie in the U.S. is

3587 probably less than the UK prevalence rates used in the calculation. Section 3.3 of Appendices 3A
3588 and 3B detail the simulation results.

3589

3590 **4.4 Alternative Scenarios**

3591 This section details the results of several simulations designed to investigate further
3592 factors influencing spread of BSE infectivity. The first scenario described models the small BSE
3593 outbreak in Switzerland to evaluate the plausibility of our model (section 4.4.1). Next we
3594 examine the spontaneous hypothesis by looking at how spontaneous disease might have spread in
3595 the years before the FDA feed ban was adopted (section 4.4.2). Section 4.4.3 examines how the
3596 import of cattle from the UK during the 1980s may have affected the U.S. The last two sections
3597 evaluate specific risk management strategies, including a specified risk material (SRM) ban
3598 identical to that imposed in the UK (Section 4.4.4), and a prohibition on the rendering of animals
3599 that die on the farm (Section 4.4.5).

3600

3601 **4.4.1 Switzerland**

3602 As discussed in Section 3.4.1, our model is not amenable to formal validation because
3603 there have been no controlled experiments in which the consequences of BSE introduction into a
3604 country have been monitored and measured. However, as a test of the model's plausibility, we
3605 modeled the small BSE outbreak reported in Switzerland following the introduction of BSE
3606 infectivity from the UK. Our simulation took into account risk management actions taken by the
3607 Swiss during the ensuing period (*e.g.*, the introduction of a feed ban regulation).

3608

3609 The model predicts both the total number of infected animals in Switzerland and the
3610 incremental number that develop clinical signs of disease. Only animals with clinical signs could
3611 be detected using the standard surveillance methods available early in the outbreak (although
3612 current surveillance practices can detect disease in animals several months before development of
3613 clinical signs). We therefore compare the monthly clinical case incidence predicted by the model
3614 to the empirical clinical case incidence estimates reported by Doherr *et al.* (1999). As illustrated
3615 in Figure 4-8, the modeled incidence rate increases above zero around two years before the
3616 empirical rate, peaks at about one-half the empirical rate, and declines to zero at around the same
3617 time the empirical rate declines to zero. The modeled cumulative incidence is approximately
3618 60% the empirical cumulative incidence. If empirical counts reflect underreporting, the actual
3619 incidence of clinical cases may exceed the modeled incidence by an even greater degree than the

3620 approximate factor of two suggested by Figure 4-8. Doherr *et al.* raise the possibility of
3621 underreporting by as much as 75%. However, Doherr *et al.* suggest that these substantial
3622 underreporting rates most likely apply to “cases late in incubation or with early clinical signs”
3623 (p. 159). It is therefore plausible that the overall underreporting rate for clinical cases would be
3624 much lower.

3625

3626 Even without an adjustment for potential underreporting, the modeled estimates
3627 described above understate the empirically reported case incidence rate. However, as described
3628 in Section 3.4.1, these modeled values reflect an initial best-guess set of assumptions with no
3629 adjustments made to try to match the empirical counts. Our results indicate that only modest
3630 changes to the assumptions (Swiss Alternative 1 and Swiss Alternative 2) are needed to achieve
3631 such a congruence. Given the level of uncertainty associated with the scenario-specific
3632 assumptions, the results in Figure 4-9 indicate that the Alternative 1 assumptions produce results
3633 that come reasonably close to matching the empirical counts. The Alternative 2 assumptions
3634 produce results that come reasonably close to matching twice the empirical counts. Complete
3635 simulation results appear in Section 4.1 of Appendices 3A and 3B.

3636

3637 Our model’s modest underprediction of clinical cases could be due to incorrect
3638 specification of the number of infected animals imported or the amount of contaminated feed
3639 introduced, among other factors. At the same time, the similarity of our predictions and the
3640 observations from Switzerland provide some confidence that the model’s structure and approach
3641 are reasonable. It is important to note that this is not a true validation and, in fact, the model’s
3642 predictions could be close to reported observations for the “wrong reasons.” However, given the
3643 absence of data suitable for validating the model, the results of the Switzerland scenario are
3644 encouraging.

3645

3646 **4.4.2 Spontaneous With no Feed Ban**

3647 To further investigate the spontaneous hypothesis, we modeled a scenario in which
3648 spontaneous disease occurs using the rates described in Section 3.3.1, but no feed ban is present
3649 to mitigate the recycling of infectivity in ruminant feed. The scenario, described in Section 3.4.2
3650 was run for 20 years.

3651

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3652 The absence of a feed ban allows BSE infectivity to rapidly spread throughout the cattle
3653 population. The mean projection for this scenario suggests 42,000 animals infected over the 20
3654 year period (95th percentile of 190,000). The average number of clinical animals predicted is
3655 1,500 (95th percentile of 6,600).

3656

3657 It should be noted that the simulation often predicts that the BSE prevalence rapidly
3658 increases towards the end of the twenty year period (see Section 4.2 in Appendices 3A and 3B for
3659 complete results). This tendency suggests that if a longer time period were simulated, the model
3660 would predict a much greater burden of disease. Hence, while some simulation runs predict
3661 prevalence rates that are low enough to be compatible with the fact that BSE has not been
3662 detected in the U.S., the results suggests that even in these cases, the prevalence would climb
3663 much higher if a longer period were simulated. That is, in the absence of a feed ban, the
3664 prevalence would most likely reach a detectable level in any case in just over 20 years. The fact
3665 that BSE was not detected in the U.S. prior to the implementation of the feed ban therefore
3666 suggests that either spontaneous disease either does not occur, or that its incidence is less than we
3667 have assumed. Alternately, the imposition of the feed ban may have stopped an epidemic before
3668 it could reach detectable levels. In that case, the base case results suggest that the feed ban will
3669 eliminate the disease shortly.

3670

3671 **4.4.3 Cattle Imported from the UK in the 1980s**

3672 This scenario investigates the likelihood that BSE infectivity could have been introduced
3673 into the U.S. by the import of 173 cattle from the UK during the 1980s that may have
3674 contaminated either human food or animal feed (see Section 3.4.3). We also determine the
3675 amount of infectivity that may have been introduced. Using these findings, we characterize the
3676 likelihood that BSE could have been introduced into the U.S. and remained undetected.

3677

3678 As discussed in Section 3.4.3, some of the cattle imported into the U.S. from the UK
3679 between 1980 and 1989 may have been infected with BSE without showing clinical signs of the
3680 disease. As a result, diseased animals may have contaminated animal feed in this country. Figure
3681 4-10 illustrates the cumulative distribution for the amount of infectivity (cattle oral ID_{50s}) that
3682 may have been in feed consumed by cattle in the U.S. (see methodology in Section 3.4.3 and in
3683 Appendix 5). The distribution indicates it is likely (probability of 82%) that U.S. cattle were
3684 exposed to no infectivity from cattle imported from the UK. The probability that cattle were

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3685 exposed to no more than 0.1 ID_{50s} is 84%, the probability that they were exposed to no more than
3686 one ID₅₀ is 86%, the probability that they were exposed to no more than five ID_{50s} is 91%, the
3687 probability that they were exposed to no more than ten ID_{50s} is 93%, and the probability that they
3688 were exposed to no more than 50 ID_{50s} is 96%.

3689

3690 To characterize the impact of introducing infectivity into the U.S. during the 1980s, we
3691 have simulated the introduction of 0.1, 1.0, 5.0, 10.0, and 50.0 cattle oral ID_{50s} into cattle feed in
3692 1980, and followed the evolution of the U.S. cattle population through 2010. The results of these
3693 simulations (see Section 4.3 in Appendices 3A and 3B) can be used to quantify the likely number
3694 of clinical BSE cases that would have occurred and hence to assess the plausibility of these
3695 scenarios in light of the fact that BSE has not been detected in the U.S. In particular,
3696 introductions that result in too large a number of clinical cases to be compatible with the fact that
3697 BSE has not been detected in the U.S. are not plausible.

3698

3699 Note that the distributions for the output quantities are highly skewed, indicating that
3700 under most circumstances the infectivity did not spread widely but that occasionally, there was a
3701 combination of events leading to significant numbers of infected cattle. For example, when 0.1
3702 cattle oral ID₅₀ is introduced into feed, more than 4,750 of the 5,000 simulation runs for this
3703 scenario produced no new cases of disease. However, a few runs produced substantial numbers
3704 of diseased animals. Hence the mean number of infected animals (over all 5,000 simulations) is
3705 45, and the mean number of animals with clinical signs is ten. Introducing larger quantities of
3706 infectivity also yields right-skewed results distributions.

3707

3708 The probability that BSE was introduced into the U.S. depends on two events – the
3709 introduction of contaminated material from imported animals into domestic cattle feed
3710 (probability of 18%), and the infection of exposed cattle and the subsequent spread of BSE to
3711 other animals without the creation of so many cases that it would have been likely to have been
3712 discovered by surveillance. Figure 4-11 illustrates for the year 2000 (year 20 of the simulation)
3713 the predicted number of cattle with clinical signs following the introduction of 0.1, 1.0, 5.0, 10.0,
3714 or 50.0 cattle oral ID_{50s} from the imported UK animals into feed administered to U.S. cattle in
3715 1980. Also plotted is the USDA's estimate of the number of clinical cases surveillance would
3716 have detected in the year 2000 with 95% probability based on the methods and level of
3717 surveillance at the time (Bridges 2001; U.S. Department of Agriculture 2002). For example, the
3718 curve in Figure 4-11 corresponding to the introduction of 10.0 ID_{50s} indicates that there is an 82%

3719 chance that this introduction caused no new BSE cases in the U.S.⁷, and that it could have
3720 resulted in a maximum of approximately 1,100 clinical cases in the year 2000. However, all
3721 values exceeding the detection limit of 470 clinical cases in the year 2000 (*i.e.*, above the
3722 horizontal “detection limit” line) are implausible because no BSE has been detected in the U.S.
3723 For the introduction of 10.0 ID₅₀s, there is a 6% chance that the number of clinical cases in 2000
3724 would have exceeded this limit (*i.e.*, a 94% chance that this value would have been below the
3725 detection limit). Hence, even if cattle in the U.S. did consume 10.0 ID₅₀s in 1980, there is only a
3726 12% chance (94% minus 82%) that it resulted in BSE cases that have not been found.
3727 Corresponding probabilities can be computed for the other ID₅₀ introductions considered.

3728

3729 Taken together, Figures 4-10 and 4-11 are useful for evaluating the likelihood that BSE
3730 cattle imports from the UK during the 1980s introduced BSE into the U.S. but resulted in too few
3731 cases for the disease to have been detected. First, there is only an 18% chance that cattle in the
3732 U.S. were exposed to any infectivity (see Figure 4-10). Second, if cattle were exposed to
3733 infectivity, there is only a limited probability that both 1) any cattle in the U.S. became infected,
3734 and 2) the number of clinical cases (in the year 2000) was less than the number that would have
3735 been likely to have been detected (see Figure 4-11).

3736

3737 Finally, the Figures in Section 4.3 of Appendix 3B illustrate how the disease spreads and
3738 contracts if it is introduced into the U.S. The figures suggest that the number of animals with
3739 detectable disease peaks in year 20 of the simulation (calendar year 2000) and declines thereafter.
3740 This prediction indicates that even if infectivity has been introduced from UK cattle imported
3741 before 1989, the disease rate has peaked and BSE will eventually be eradicated. The decline in
3742 the predicted disease prevalence in the U.S. is due primarily to the introduction of the FDA feed
3743 ban in 1997.

3744

3745 **4.4.4 Specified Risk Material Ban**

3746 Many countries with BSE have prohibited the use of certain tissues in either animal feed
3747 or human food. These specified risk material (SRM) bans focus on tissues carrying the greatest

⁷ Figure 4-9 illustrates the number of clinical cases in the year 2000, not the total number of BSE cases caused by the import of BSE-infected cattle from the UK. However, the scenario simulated assumes that action to mitigate the spread of BSE in the U.S. occurs only after implementation of the feed ban in 1997. Hence, as suggested by the figures in Section 4.3 of Appendix 3B, the number of clinical animals peaks

3748 amount of BSE infectivity. To evaluate how such a ban would influence the spread of BSE in the
3749 U.S., we altered the base case scenario as described in section 3.4.4 to mimic the UK SRM ban.

3750

3751 The SRM ban has a dramatic effect on both potential human exposure and the spread of
3752 BSE among cattle. Following the introduction of 10 infected cattle, as in the base case, the mean
3753 number of new BSE cases is reduced by nearly 90% (from 4.3 to 0.53) and the mean number of
3754 cattle oral ID₅₀s potentially available for human exposure decreases by 95% (from 39 to 1.8).

3755 Results for this scenario appear in Section 4.4 of Appendices 3A and 3B.

3756

3757 **4.4.5 Prohibition on Rendering Animals that Die on the Farm**

3758 The results for the base case simulation (section 4.1 and Section 1 in Appendices 3A and
3759 3B) clearly indicate that if BSE is introduced into the U.S., the greatest potential source feed
3760 contamination is animals that die prior to being sent to slaughter (animals that die on the farm)
3761 and are rendered. The simulations in this report assume that an animal lives for between two and
3762 six months following the development of clinical signs. Rendering an animal that has reached the
3763 clinical stage of disease introduces the maximum amount of infectivity into rendering and
3764 potentially into feed. Hence, a single breach of the feed ban can introduce expose cattle to a
3765 substantial amount of BSE infectivity.

3766

3767 The simulation results indicate that banning the rendering of animals that die on the farm
3768 would substantially reduce the spread of BSE to other cattle following introduction of ten infected
3769 cattle. Compared to the base case, the mean number of new cases decreases by more than 80%
3770 (from 4.3 to 0.77). Although this approach targets the spread of BSE to other animals, it also
3771 influences potential human exposure to BSE infectivity, decreasing this quantity by more than
3772 20% because it decreases the number of new BSE cases. Complete results appear in Section 4.5
3773 of Appendices 3A and 3B.

3774

3775 **4.5 Summary**

3776 This report addresses the potential for BSE to become a major animal health problem or
3777 substantially contaminate the human food supply in the U.S. The results characterize the

around the year 2000. As a result, if there are zero clinical animals in the year 2000, it is almost certain that few if any animals were infected in the U.S.

3778 robustness of regulations and practices in the U.S., and help to identify data or research that
3779 would most increase confidence in our predictions. In addition, the results help to characterize
3780 the potential impact that various sources of BSE may have had in the U.S. in the past, including
3781 cattle imported from the UK in the 1980s. Finally, the simulation can be used to characterize the
3782 effectiveness of additional risk management strategies.

3783

3784 We recognize that the identification of a single case of BSE in the U.S. would have
3785 important ramifications for public opinion, trade, and other areas. Yet this analysis demonstrates
3786 that even if BSE were somehow to arise in the U.S., few additional animals would become
3787 infected, little infectivity would be available for potential human exposure, and the disease would
3788 be eradicated. In short, the U.S. appears very resistant to a BSE challenge, primarily because of
3789 the FDA feed ban, which greatly reduces the chance that an infected animal would infect other
3790 animals. However, the effectiveness of the feed ban is somewhat uncertain because compliance
3791 rates are not precisely known.

3792

3793 Potential sources of human exposure to BSE infectivity can be divided into two
3794 categories: specific high-risk tissues and contamination of low-risk tissues. Although not widely
3795 popular in the U.S., both brain and spinal cord are consumed by some members of the population.
3796 If BSE were present in the U.S., these tissues would be an obvious source of exposure. Our
3797 analysis indicates that the most important means by which low risk tissue can become
3798 contaminated is the use of advanced meat recovery (AMR) technology, which can leave spinal
3799 cord or dorsal root ganglia (DRG) in the recovered meat. Our analysis further indicates that mis-
3800 splitting of the spinal column and the resulting incomplete removal of the spinal cord is largely
3801 responsible for contamination of AMR meat. In addition, we assume that even in the absence of
3802 mis-splitting, some amount of DRG is extracted whenever vertebrae are processed by AMR.
3803 Contamination due to aerosolization of the spinal cord during splitting contributes substantially
3804 less contamination even though it occurs every time an infected animal is processed.

3805

3806 Despite the potential for the consumption of high risk-tissues and the contamination of
3807 low-risk tissues, our results indicate that only small amounts of infectivity are available for
3808 human consumption. The import of one infected animal yields an average of 3.7 cattle oral ID_{50s}
3809 for potential human exposure over a 20 year period, while the import of ten infected cattle results
3810 in an average of 39 cattle oral ID_{50s} this period. These results can be put into context by
3811 comparing them to potential human exposure in the UK where it is estimated almost one million

3812 cattle were infected over a 15 to 20 year period. If the UK population was potentially exposed to
3813 only one cattle oral ID₅₀ from each of these animals, potential human exposure in the UK would
3814 dwarf our projections for the U.S. At this time, just over 100 cases of variant Creutzfeldt-Jakob
3815 disease (the human TSE linked to BSE) have been identified in the UK, although projections
3816 range from a few hundred to tens of thousands of eventual cases. If cattle oral ID₅₀s available for
3817 human consumption is a good indicator of possible disease risk, it is unlikely the UK experience
3818 would be duplicated in the U.S.

3819

3820 There are a number of model assumptions that cannot be verified with confidence, some
3821 of which substantially influence the conclusions drawn. With regard to estimating the spread of
3822 BSE among cattle, the most influential sources of uncertainty are related to compliance with the
3823 FDA feed ban. Within this category, the most important source of uncertainty is the misfeeding
3824 rate on farms. Misfeeding prohibited feed (containing ruminant protein) to cattle on farms that
3825 raise both cattle and either pigs or chickens completely compromises the feed ban. This practice
3826 is the focus of efforts to understand how animals born after the implementation of feed bans in
3827 Europe have become infected with BSE. Uncertainty with respect to compliance rates can be
3828 reduced with field work and data collection. A second source of uncertainty associated with the
3829 feed ban is the proportion of feed produced that is mislabeled (*i.e.*, lacks the proper labels
3830 identifying it as feed not to be administered to ruminants). Finally, assumptions regarding the
3831 prevalence of alternative rendering technologies used (and hence the degree to which rendering
3832 may reduce the level of infectivity in tissue processed to produce MBM) also influence the
3833 predicted spread of BSE.

3834

3835 Improving estimates of compliance with the feed ban would also improve the precision of
3836 our estimates of potential human exposure to BSE-contaminated meat. The assumed number of
3837 ID₅₀s per clinical case of BSE also has a notable impact on predicted potential human exposure to
3838 BSE.

3839

3840 We have identified three important ways in which BSE could be introduced into the U.S:
3841 1) cross-species transmission from a native TSE like sheep scrapie, 2) spontaneous development
3842 of the disease in native animals, or 3) the import of an infected animal or animal product from a
3843 country with BSE. The analysis suggests that either cross-species transmission of a TSE (scrapie)
3844 or spontaneous disease, if they can occur, would cause only a few cases of BSE each year and
3845 would result in relatively little potential human exposure. However, results from our evaluation

3846 of the impact of spontaneous BSE on the U.S. prior to the 1997 FDA feed ban casts doubt on the
3847 plausibility of this potential source of BSE. In particular, our results suggest there is a substantial
3848 probability that the number of animals with clinical signs would be sufficiently high to be
3849 inconsistent with the fact that surveillance has failed to detect BSE in the U.S. At the same time,
3850 the simulation results indicate that there is a non-trivial probability that spontaneous BSE would
3851 generate an insufficient number of animals to be detected by surveillance.

3852

3853 Although it is not possible to know if an infected animal was imported from the UK in
3854 the 1980s, our analysis suggests it is highly unlikely. First, the imported animals whose
3855 disposition is not known came from farms where the disease was not found in any animal born
3856 during the same year. Second, the beef breeding animals imported had little exposure to
3857 potentially infected protein supplements while in the UK. Finally, many of the animals are
3858 known to have lived beyond the average incubation period once they arrived in the US.
3859 Nonetheless, there is some small probability that at least one of these animals was infected and
3860 that infectivity from such an animal contaminated feed consumed by cattle in the U.S. Exposure
3861 to infectivity among U.S. cattle could not have been substantial because in the years prior to the
3862 1997 FDA feed ban, such exposure would have eventually resulted in a substantial number of
3863 clinical cases, a prediction that is inconsistent with the fact that BSE has not been identified in the
3864 U.S. to date. There is therefore a small chance that BSE could have been introduced into the U.S.
3865 and remained undetected. Even if BSE was introduced, actions by USDA and FDA have already
3866 arrested the spread of the disease and have begun to reduce its prevalence. If BSE is present in
3867 the U.S., these actions will ultimately lead to the disease's eradication.

3868

3869 Evaluation of potential risk management actions highlights an additional benefit of this
3870 type of analysis. The insights provided by the model demonstrate that interventions very early in
3871 the rendering and feed production process can avoid the need for other, more obvious, measures.
3872 Specifically, removing most of the infectivity from rendered product can protect human and
3873 animal health even if the feed ban is not 100% effective. Both disposing of all specified risk
3874 materials and prohibiting the rendering of animals that die prior to being sent to slaughter,
3875 *i.e.*, animals that may have died of BSE and hence have high levels of infectivity, reduce potential
3876 new cases of BSE by more than 80%. The misfeeding rate, a key parameter identified in our
3877 sensitivity analysis, is not important if the infectivity in prohibited MBM is greatly reduced or
3878 eliminated. The SRM ban also reduces substantially the amount of infectivity available for
3879 potential human exposure. Of course, it must be recognized that even in the absence of these

Section 4

3880 measures, animal health risks and human exposure are both small, with the import of ten infected
3881 cattle leading to an average of fewer than five new cases of BSE and potential human exposure to
3882 39 cattle oral ID₅₀s.

3883

3884 As we strive to learn more about BSE and limit the extent of the disease, the model
3885 developed for this analysis has many potential uses. It is flexible and can be changed easily. For
3886 example, if appropriate data are available, its parameters can be modified so that other countries
3887 or regions can be simulated. Specific scenarios of interest can be evaluated, including risk
3888 management actions under consideration. The model can also be used to evaluate hypotheses
3889 about sources and factors influencing the BSE's spread. We hope this model will find a place
3890 among the useful tools for understanding and controlling BSE.

3891

3892 **Glossary**

3893 **AMR (Advanced Meat Recovery)** – FSIS (U.S. Department of Agriculture (FSIS) 2002) states
3894 that “*AMR systems remove the attached skeletal muscle and edible tissues from carcasses without*
3895 *breaking or crushing bones. This machinery separates meat by scraping, shaving or pressing the*
3896 *muscle and edible tissue away from the bone. However, unlike traditional mechanical separation,*
3897 *AMR machinery cannot break, grind, crush or pulverize bones to separate muscle tissue. Bones*
3898 *must emerge essentially intact and in natural physical conformation.*”
3899

3900 **APHIS (Animal Plant Health Inspection Services)** – APHIS is an agency that is part of the
3901 U.S. Department of Agriculture.
3902

3903 **BSE (Bovine Spongiform Encephalopathy)** – BSE is a slowly progressive and fatal prion
3904 disease of adult cattle. The disease is characterized for spongy changes in the brain and a long
3905 incubation period.
3906

3907 **BSE Inquiry** - Inquiry established by the UK Prime Minister to investigate the emergence and
3908 identification of Bovine Spongiform Encephalopathy (BSE) and variant Creutzfeldt Jakob
3909 Disease (vCJD) as well as the government response. The Inquiry was established on March 20,
3910 1996.
3911

3912 **Bypass protein** – Bypass protein is the feed protein that escapes digestion in the rumen and
3913 passes into the lower digestive tract where is digested and absorbed. Bypass proteins are
3914 important proteins in the nutrition of dairy animals.
3915

3916 **CJD (Creutzfeldt-Jakob Disease)** – CJD is a fatal prion disease that has been known for many
3917 years to affect human. It can be transmitted as the result of consuming contaminated tissue (as
3918 part of cannibalistic rituals) or when contaminated tissue is used in surgical procedures.
3919

3920 **CNS (Central Nervous System)** – The CNS consists of nervous tissue that includes brain and
3921 spinal cord.
3922

3923 **Codon** – A series of 3 successive nucleotides in nucleic acid that specifies a particular amino acid
3924 or signal sequence in a protein.
3925

3926 **CWD (Chronic Wasting Disease)** – CWD is a prion disease that affects white tail deer, mule
3927 deer and elk. The disease has been found only in North America.
3928

3929 **Distal Ileum** – The distal ileum is the lower portion of the small intestine.
3930

3931 **Downer Cattle** – See “non-ambulatory cattle.”
3932

3933 **DRG (Dorsal Root Ganglia)** – DRG are the nervous tissue that are located within the bones of
3934 the vertebral column. DRG contain nerve cells that transfer sensory signals from parts of the
3935 body to the spinal cord.
3936

3937 **FDA** – U.S. Food and Drug Administration
3938

3939 **FFI (Fatal Familial Insomnia)** – FFI is a rare human familial prion disease.

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- 3940
3941 **FSE (Feline Spongiform Encephalopathy)** – FSE is a prion disease that affects cats. Exposure
3942 to the BSE agent is the most likely explanation for the emergence of the disease.
3943 **FSIS (Food Safety and Inspection Service)** – FSIS is an agency that is part of the U.S.
3944 Department of Agriculture.
3945
3946 **Genotype** – Genetic constitution of an individual organism. In particular, this term refers to the
3947 specific chromosomal alleles that determine specific traits.
3948
3949 **GSS (Gerstmann-Sträussler-Scheinker)** – GSS is a rare familial prion disease that affects
3950 humans.
3951
3952 **HCRA** – Harvard Center for Risk Analysis.
3953
3954 **Heterozygous** – This term refers to organisms that have two different alleles of the same gene.
3955
3956 **Histopathology** – The study of microscopic changes in diseased tissues.
3957
3958 **Homozygous** – This term refers to individuals that have two identical alleles of the same gene.
3959
3960 **Horizontal transmission** – Transmission within a population other than by genetic or maternal
3961 means.
3962
3963 **i.c. (intracerebral) inoculation** – Injection into the brain
3964
3965 **ID₅₀ (Infectious Dose 50)** – An ID₅₀ is the amount of infectious material (e.g., infective bovine
3966 brain) that when consumed results in disease infection with 50% probability. The amount of
3967 material that constitutes one ID₅₀ depends on the route of exposure (e.g., oral administration or
3968 intracerebral inoculation).
3969
3970 **Immune response** – This response is the action taken by the body to minimize the damage
3971 resulting from the presence of a foreign agent in the body.
3972
3973 **Immunohistochemistry** – Techniques for staining cells or tissues using labeled antibodies
3974 against specific proteins.
3975
3976 **Incubation period** – The period between infection and clinical manifestation of the disease.
3977
3978 **Infectivity** – Infectivity is a general term referring to the agent that is capable of passing on
3979 disease.
3980
3981 **i.p. (intraperitoneal) inoculation** – Injection into the abdominal cavity.
3982
3983 **Kuru** – Kuru is a rare human prion disease found in the Fore population of Papua, New Guinea.
3984
3985 **Mad-Cow Disease** – The colloquial name for bovine spongiform encephalopathy.
3986
3987 **MAFF (The UK Ministry of Agriculture, Fisheries and Food)** – MAFF has been renamed the
3988 Department of Environment Food and Rural Affairs (DEFRA).
3989

- 3990 **Maternal Transmission** – Transmission from dam to offspring *in utero* (during pregnancy) or
3991 during the intermediate post partum period
3992
3993 **MBM (Meat-and-bone meal)** – MBM is a dried homogenized material produced by rendering
3994 animal tissues. MBM is used as a protein source in the production of animal feed.
3995
3996 **MRM (Mechanically Recovered Meat)** – MRM is defined as “...*residual material, off bones,*
3997 *obtained by machines operating on auger, hydraulic or other pressure principles in such a*
3998 *manner that the cellular structure of the material is broken down sufficiently for it to flow in*
3999 *puree form from the bone*” (BSE Inquiry 2000b).
4000
4001 **Non-ambulatory cattle** – Non-ambulatory cattle include animals that are unable to rise. This
4002 condition is common and usually affects animals around parturition. It can also result from a
4003 variety of causes, including neurological disease.
4004
4005 **Non Prohibited Feed** – Non-prohibited feed does not contain proteins derived from ruminants
4006 and/or mink and can therefore be legally administered to ruminants.
4007
4008 **Non Prohibited MBM** – Non-prohibited meat and bone meal does not contain proteins derived
4009 from ruminants and/or mink and hence can legally be used in the preparation of ruminant feed.
4010
4011 **OIE (Office International des Epizooties)** – OIE determines animal health standards for
4012 international trade, advises the veterinary services in member countries and aims to work towards
4013 the eradication of the most dangerous animal and zoonotic diseases. As of May, 2003, 164
4014 countries belonged to the OIE.
4015
4016 **Pathogenesis** – This term refers to the process by which disease develops in an organism.
4017
4018 **Pre-clinical** – Refers to the disease stage prior to the manifestation of clinical signs or symptoms.
4019
4020 **Prion Disease** – Prion diseases are a family of fatal brain diseases that occur in a number of
4021 mammals including humans. These diseases are also known as Transmissible Spongiform
4022 Encephalopathies (TSE’s). Prion diseases are caused by the build-up of abnormal proteins in the
4023 central nervous system.
4024
4025 **Prohibited Feed** – Prohibited feed contains ruminant protein or mink protein and therefore
4026 cannot be legally used to produce feed for ruminants.
4027
4028 **Prohibited MBM** – Prohibited meat and bone meal contains ruminant protein or mink protein
4029 and therefore cannot be legally used to produce feed for ruminants.
4030
4031 **PrP (Prion Proteins)** – Prions are proteins that occur naturally in animals and humans. Research
4032 suggests that if a prion is folded incorrectly and hence has an abnormal shape, it can induce
4033 disease. Moreover, when mis-shaped proteins come into contact with normal proteins, they can
4034 “recruit” the normal proteins, causing them to become mis-shaped. Some scientists believe that if
4035 this process progresses sufficiently, prions can damage the brain, causing it to become spongy and
4036 filled with holes. This phenomenon gives rise to the scientific name for mad cow disease (bovine
4037 spongiform encephalopathy).
4038
4039 **PrP^C, PrP^{Sc}** – The normally folded form of PrP.
4040

Glossary

- 4041 **PrP^{gene}** – Gene found in mammals that determines the amino acid sequence for the PrP^C protein.
4042
4043 **PrP^{Sc}, PrP^{Res}** – The abnormally folded disease-specific isoform of PrP.
4044
4045 **Rendering** – Rendering is processing of offal and discarded parts of animal carcasses to produce
4046 two products: meat and bone meal (MBM) and tallow. The rendering process consists of drying,
4047 cooking, and separating the solid fraction (protein meals) from the melted liquid fraction (tallow).
4048
4049 **Ruminant** – Animal that chews the cud (partially digested food) regurgitated from its rumen, and
4050 has a stomach with four compartments.
4051
4052 **Scrapie** – Scrapie is a prion disease that affects sheep and goats.
4053
4054 **SEAC (Spongiform Encephalopathy Advisory Committee)** – Established in UK to advise the
4055 government on matters related to TSEs (prion diseases).
4056
4057 **Spinal Cord** – The part of the nervous system that runs through the spine or vertebral column.
4058
4059 **SRM (Specified Risk Material)** – Tissues in cattle, sheep and goats such as brain tissue and
4060 spinal cord, that are most likely to contain the BSE infective agent.
4061
4062 **SSC (Scientific Steering Committee)** – Established in the European Community to advise its
4063 members on matters related to TSE's (prion diseases) and other zoonoses.
4064
4065 **Tallow** – The fat produced by the rendering process.
4066
4067 **TME (Transmissible Mink Encephalopathy)** – TME is a prion disease that affects mink. The
4068 disease has been found several countries.
4069
4070 **TSEs (Transmissible Spongiform Encephalopathies)** – See prion disease.
4071
4072 **USDA** – United States Department of Agriculture
4073
4074 **vCJD (variant Creutzfeldt-Jakob Disease)** – vCJD is the name of the human prion disease that
4075 is thought to be caused by consumption of BSE-contaminated meat.
4076
4077 **Vertebral Column** – The supporting line of bones that make up the spine and house the spinal
4078 cord.
4079
4080 **Vertical Transmission** – Transmission of disease from parent to the offspring. See also maternal
4081 transmission.
4082
4083 **Western Blot** – A method use for detecting proteins, including diseased PrP. This method can be
4084 used to diagnose TSEs.
4085
4086 **WHO** – World Health Organization.
4087
4088 **Zoonosis** - Animal diseases that can be transmitted to humans.
4089

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