

PROTECT - INVESTIGATION

FINAL NOTE OF CHEMICAL HAZARD IDENTIFICATION AND RISK SURVEILLANCE (CHaIRS) GROUP MEETING

DATE & TIME: 9 SEPTEMBER 2009 AT 10:00AM

VENUE: MEETING HELD VIA TELECONFERENCE

ATTENDEES

Chris Livesey (Chair)	Veterinary Laboratories Agency
Jo Payne	Veterinary Laboratories Agency
John Caseley	Food Standards Agency
Christina Baskaran	Food Standards Agency
Ovnair Sepai	Health Protection Agency
Steve Wyllie	Department for the Environment, Food and Rural Affairs
David Harris	Animal Health
Alison Gowers	Environment Agency
John Cuthbert	Health and Safety Laboratory
Martin Ball	Health and Safety Executive
Martin Rose	Food and Environment Research Agency
David Webb	Veterinary Medicines Directorate

WELCOME & INTRODUCTIONS

1. The Chair welcomed attendees to the meeting. Apologies for absence had been received from Rebecca Garcia (Defra). Christina Baskaran was deputizing for Jillian Spindura, Martin Ball was deputizing for Chris Mawdsley and John Cuthbert was deputizing for Paul Johnson. Two papers (an agenda and a final note of the 3rd CHaIRS Meeting on 30 June 2009) were circulated to members prior to the meeting.

MATTERS ARISING

2. The Secretary provided a verbal update on matters arising from the last CHaIRS Group meeting in June, as follows:

- At the June meeting, one member asked whether there had been any feedback from the UK Zoonoses, Animal Diseases and Infections Group (UKZADI) about the CHaIRS briefing paper. It was explained that this action was still outstanding as the CHaIRS Secretariat was still awaiting a response from the UKZADI Secretariat. It was agreed that this action would be followed up.

ACTION: STEVE WYLLIE

- Another action concerned additional items for the group's forward work plan. Since the last meeting the Secretariat had not received any additional suggested work items for the group and the Secretary repeated his request for suggestions from members, to help the Secretariat delineate a suitable work plan for the group over the coming months.

ACTION: ALL

- One member queried at the last meeting whether it was acceptable to forward incident notifications to others within their organisation. It was confirmed that the Secretariat had since checked this point with the Agency's Information and Knowledge Management Unit, who confirmed that provided the scope of the dissemination was sufficiently narrow (e.g. to assist officials in carrying out their investigations) then this should be acceptable. However, it was added that if the intention is to use the data for other means (e.g. marketing purposes), then, on the basis that the party in question has not been consulted, this would constitute a breach of the Data Protection Act, in their view. On the basis of the information provided, Members agreed that incident notifications could be disseminated.

- Regarding a recent lead poisoning incident where the source was thought to be a clay pigeon shoot, it was suggested at the last meeting that to prevent similar incidents to this occurring in future, a code of practice should be drawn up, with input from the Clay Pigeon Shooting Association (CPSA) and British Association for Shooting and Conservation (BASC). The Secretariat confirmed that this suggestion has been passed to Agency colleagues that deal with Incident Prevention for further consideration.
- Another suggestion at the last meeting was to give consideration to including LACORS within the CHAIRS group (on the basis of LA involvement in a number of these incidents). The Secretariat confirmed that they had since spoken to Les Bailey (LACORS) about this matter. Due to other pressures of work, LACORS are currently unable to commit to providing a full time member for the group. However, they have asked to be sent agenda papers and minutes and have also indicated that they may be able to attend or contribute, on an ad hoc basis, in future depending on the subject matter and its importance.
- One of the incidents discussed at the June meeting was the poisoning incident at the Rhodia site and a number of areas were identified where further information or advice was needed. It was confirmed that an update on this incident would be provided under agenda item 3.

DISCUSSION RE: INCIDENTS NOTIFIED TO CHAIRS

3. The Chair introduced this item regarding three on-farm incidents notified to CHAIRS over the last few months and one long running incident, pre-dating the formation of the group, of interest to members.

Rhodia incident

4. Members were updated regarding this incident, as follows:
 - s.40(2) a member of the public, still has major concerns over the waste lagoon owned by Rhodia and the suspicion that the presence of white phosphorus (WP) within the lagoon is killing swans.
 - In June 2009 s.40(2) made formal complaints to HSE and VLA about how the incident was being handled. Both Agencies have attempted to address his concerns. On 25 August 2009 Dave Whitford from the EA, Kay Brookes from HSE and Jo Payne from VLA, along with relevant Agency colleagues, organised a meeting at HSE Birmingham to share information about each Agency's remit and discuss future investigations. Kay Brookes will be summarising the discussions of the meeting when she writes to s.40(2). Members asked if a copy of this letter could be circulated when available. Jo Payne agreed to look into this.

ACTION: JO PAYNE

- The conclusions of the meeting were that HSE and EA are content with their current situation. VLA will continue to encourage the submission of swans and other dead birds for full post mortem investigation and analysis for the presence of white phosphorus. All agencies will be kept updated on progress.
5. The Chair asked members for comments. Regarding recent analysis carried out, one member confirmed that analysis of birds for WP has been carried out at Harlan labs, Derbyshire and paid for by Rhodia, but no results have been seen yet. Regarding analysing the sediment in the lagoon it was confirmed that this would be problematic and, in any case, negative results would not prove there was no WP still present in drums¹ buried under sediments.
 6. With regards to health effects associated with WP, it was confirmed that direct human exposure to WP could result in burns. It was added that WP causes neurological signs in water birds. These signs are very similar to signs presented in conditions such as lead poisoning and some infectious conditions such as duck viral enteritis (DVE). DVE was diagnosed in a bird autopsied recently.
 7. One member enquired whether anything else besides WP could be causing these deaths (e.g. break down products). VLA confirmed that this was the reason for the investigation (i.e. to explore the

¹ The WP was originally disposed of several decades ago in steel drums, some of which subsequently floated to the surface and were sunk using rifle fire. Since the WP disposal, the pool has been used for disposal of calcium phosphate waste.

possible causes). The Chair added that it was appropriate for VLA to conduct comprehensive post mortems on the birds in each case and not just focus on WP.

8. On the question of future monitoring and analysis as part of the ongoing incident investigation, VLA confirmed that they would be working with Rhodia regarding this issue. They would particularly be looking for the site to be more regularly monitored in future (e.g. weekly) and would continue to investigate the cause of death of all dead birds submitted and monitor for WP.

Sections 30(1)(g) and 30(2)(a) to (c) FOIA

Section 31(1)(g) and s.31(2)(a) to (c) FOIA.

Section 31(1)(g) and 5.31(2)(a) to
(c) Fe/A

SUITABILITY OF RECYCLED MATERIAL FOR USE IN ANIMAL BEDDING

21. The Chair introduced this item. At the June meeting the group discussed the issue of recycled material being used as animal bedding, to ascertain whether there are any animal health, food safety or operator safety issues associated with this current practice. As a first step, it was agreed that the group focus in the first instance on paper sludge ash.

22. It was confirmed at the June meeting that, under a draft EA quality protocol, paper sludge ash was permitted for use, among other things, as a desiccant for animal bedding. The Chair commented that the relevant EA protocols and position statements are impressive. The Chair also highlighted Section 3.13 of the report which states the composition of PSA will vary with input materials, operational procedures and technology used for combustion.

23. Members were asked for their views regarding paper sludge ash (PSA) and its use as bedding. The Chair added that EA has since suggested additionally discussing plasterboard and demolition waste too under this item. Consequently comments were sought on the use of this material as bedding too.

24. One member confirmed that if members had specific concerns about the draft quality protocol there was still time to comment. Another comment was that whilst safe recycling should be promoted, the use of novel recycled materials in the husbandry of farm animals need to be monitored in case unexpected adverse reactions occur. In addition, if combustion was inefficient, dioxins contamination would probably be higher and PAH content could be significant². One member commented that he had no problem with raising awareness but added that any article needed to be suitably balanced. The member added that the article should include a suitable contact for technical advice re: use of PSA. It was agreed that to raise awareness re: this issue an item should be included within the VLA's regular newsletter. EA asked to have sight of the draft.

² Assuming effective combustion etc, the hazards arising from this material could include; respiratory irritation and skin irritation (with implications for mastitis where the product is used as a bedding conditioner) arising from dust and metals in the ash.

ACTION: JO PAYNE

25. It was confirmed that the EA is assessing the risks associated with the use of plasterboard and demolition materials for animal bedding. EA are aware that plasterboard may contain insulation materials such as fibreglass and fungistats in addition to cardboard and gypsum. Demolition materials can include plastics and metals from plumbing and electrical installations as well as insulation materials.

26. HSL offered to make samples of plasterboard collected for other purposes available to EA. VLA and FSA offered to make staff available to contribute to the EA risk assessments for these materials. It was suggested that the major plasterboard manufacturers should be asked what is present in their products. Although this may be commercially sensitive they stand to gain a method of disposal by recycling if they are able to share this information.

27. It was agreed that as part of the ongoing risk assessment process the EA will obtain input from other group members wishing to contribute.

ACTION: ALISON GOWERS

HANDLING ARRANGEMENTS RE: RESTRICTED DOCUMENTS

28. The Secretariat confirmed that at the last meeting there was discussion about e-mail security arrangements as three departments (EA, HPA and HSL) were not part of the gsi network and so could not be e-mailed 'restricted' documents. Clarification was sought regarding whether these departments were in the process of becoming gsi enabled or had equivalent e-mail security arrangements in place. The Secretary confirmed that both EA and HSL are in the process of getting gsi. HPA however said that there are no immediate plans to introduce gsi within their organisation.

29. Members queried whether the correspondence on individual incidents could be circulated under a 'protect' rather than 'restricted' marking. If this were the case then all this correspondence could be sent via e-mail, regardless of whether recipients were part of the gsi network. The Secretariat agreed to clarify this point with their security and legal experts and report back to the group as soon as possible. In the interim current procedures would continue.

ACTION: JOHN CASELEY

AOB

30. As the meeting had run out of time at this point it was agreed that two items would be deferred until the next meeting, namely contamination of animal feed with lead and discussion of the MRL for copper in ruminant liver.

NEXT MEETING: 2 DECEMBER 2009 (PM) IN AVIATION HOUSE, LONDON

**John Caseley
CHaIRS Secretariat
September 2009**