

What went wrong in the BSE file?

A Commentary by William Leiss
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The informative article by David Staples, “The BSE saga: a long and maddening road” (*Edmonton Journal*, March 6), ends with these remarks from the CFIA’s chief vet, Brian Evans: “That, I think, is the ongoing legacy of BSE. In the same way that people have been critical that the government didn’t do enough in some people’s minds in 1990 and 1993 to prevent BSE from getting into the cattle population, my view is that people will look back in 2020 and say, ‘What was the government thinking when it spent all that money on this particular disease?’”

No, Mr. Evans: In my opinion, that is not what we will be asking ourselves in 2010, 2020, and beyond. To say that this is the key question, in a long-term view, to emerge from Canada’s BSE crisis is to do a serious disservice to the beef farmers whose lives and livelihoods have been ruined by it. The key question is: Why did Canada’s risk manager (CFIA) not do a proper risk assessment, right after 1997, so that it could communicate the true – catastrophic – risk of impending calamity to Canadian beef farmers? And why do both the Federal and Alberta governments continue to insist that the only solution going forward is to re-establish the practice of shipping millions of live animals per year across the fickle U. S. border?

Here is my bill of indictment. All of the evidence to support the propositions in what follows has been published, by me and others (see www.leiss.ca):

1. Why was no proper risk assessment of BSE for Canada, using a recognized international standard, ever performed by CFIA, to this day? A standard risk assessment uses the formula $R = P \times C$, where R is risk, P is probability (or expected frequency), and C is consequences or impact. CFIA’s so-called risk assessment, dated December 2002, is actually a frequency estimation only, since consequences were not estimated. It was not the expected frequency (7 chances in a thousand, according to CFIA) that was important: It was the consequences of finding even just one case in our herd, at the time when Canada, like other beef-exporting nations, had a policy of “one case and you’re out of the beef export business – for seven years.”
2. Why did the CFIA do a quantitative frequency estimation in 2002 only for the period before 1997? Who would care in 2002 what the risk was before 1997? Why not do a quantitative estimation for the really important period, that is,

after 1997? And, if CFIA did not have the resources on hand to do so, why didn't it follow the US lead and ask for outside help (the USDA asked the Harvard Centre for Risk Analysis for this type of help in 1998)?

3. Why did CFIA refuse to collaborate with Health Canada in 2000 and thereafter to complete HC's draft and unpublished risk assessment for BSE in Canada? The never-completed HC study is the only federal document on BSE ever produced which includes a rigorous exposure pathway analysis; certainly there is no evidence that CFIA itself ever published such an analysis.
4. Why did CFIA take so long (1997 to early 2003) to produce any risk estimation at all, even a seriously flawed one? During all this time, Canada's beef farmers were building up their export herds. During all this time, they were at catastrophic risk, as we discovered in May 2003. All the evidence needed by CFIA to tell farmers that they were at catastrophic risk was available by 1997 (although the evidence had not been analyzed, of course).

Instead, both Canada's beef farmers and the rest of the world were told something else entirely, as David Staples shows in quoting the CFIA's Claude Lavigne's 2001 remarks: "We are completely free [of BSE]. The risk of transmission in a country where the disease doesn't exist is zero. And that's our situation."

My bill of indictment concludes as follows: Certainly CFIA did not know that such a statement was false at the time when it was made, because the risk estimation had not been completed. But this also means that there could be no justification for Mr. Lavigne's remarks; his statement was irresponsible in the extreme, because it gave Canada's beef farmers a false reassurance which contributed to their ultimate ruin.

What if CFIA had figured out the truth, and then told the truth in clear language? What if the agency, having done what was needed, namely, a post-1997 risk estimation – in, say, 1999 – had then told Canadian beef farmers: "You are at risk of catastrophic economic failure. You should reduce your herds and exports starting immediately, until we have evaluated the risk again at a later time."

How would the cattlemen's association and the Alberta government have reacted? Would they have said, "Yes, we agree with this wise advice, and we will work with beef farmers to get this done." Or would they have said: "CFIA is only guessing. We don't have any BSE in Canada. This is a piece of foolish federal meddling in an important provincial industry."

Take your pick. The problem is, risk assessments come with uncertainties, because that's the nature of risk: You can tell your kids not to drink and drive, but you can't prove to them in advance that if they do, they'll wind up dead or injured. But if we're

smart, we will try to figure out what disasters might lie ahead, and take the prudent steps needed to reduce the impact they might have on us, if we cannot prevent them from happening altogether.

The economic losses from BSE in Canada exceed \$5billion to date (and may be as high as \$7-\$8b already), and they will continue to increase now that the US has once again “delayed” the opening of its borders. The personal and family costs to Canada’s beef farmers are incalculable. We must not allow this to happen again. All of us in Canada need answers to the questions posed above.

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