

1 **Assessing the aggregated probability of entry of a novel prion disease**  
2 **agent into the United Kingdom**

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17 **Running title:** Probability of entry of novel prion agent into the UK

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31 *Abstract*

32 In 2018 prion disease was detected in camels at an abattoir in Algeria for the first time. The  
33 emergence of prion disease in this species made it prudent to assess the probability of entry of the  
34 pathogen into the United Kingdom (UK) from this region. Potentially contaminated products were  
35 identified as evidenced by other prion diseases. The aggregated probability of entry of the pathogen  
36 was estimated as very high and high for legal milk and cheese imports respectively and very high,  
37 high and high for illegal meat, milk and cheese products respectively. This aggregated probability  
38 represents a qualitative assessment of the probability of one or more entry events per year into the  
39 UK; it gives no indication of the number of entry events per year. The uncertainty associated with  
40 these estimates was high due to the unknown variation in prevalence of infection in camels and an  
41 uncertain number and type of illegal products entering the UK. Potential public health implications  
42 of this pathogen are unknown although there is currently no evidence of zoonotic transmission of  
43 prion diseases other than bovine spongiform encephalopathy to humans.

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45 **Keywords:** Aggregated probability; entry assessment; prion agent

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57 *Introduction*

58 Prion diseases, or transmissible spongiform encephalopathies (TSEs), are progressive  
59 neurodegenerative disorders that affect both humans and animals and are characterised by long  
60 incubation periods frequently of many years. Such disorders are biochemically characterised by  
61 conversion of a normal cellular form of the prion protein (PrP<sup>c</sup>) into a misfolded disease associated  
62 form (PrP<sup>S<sup>c</sup></sup>) that accumulates into amyloid protein aggregates in the brain [Norrby, 2011].

63 Scrapie in sheep was the first animal TSE to be described in the 18<sup>th</sup> century in Great Britain but  
64 TSEs have since been detected in a number of species, including scrapie in goats, chronic wasting  
65 disease (CWD) in deer and bovine spongiform encephalopathy (BSE) in cattle. The BSE crisis led  
66 to the slaughter of 3.3 million cattle and an estimated economic loss of £3.7 billion in the United  
67 Kingdom (UK) [Beck, 2007]. It is believed that BSE crossed the species barrier to humans through  
68 the consumption of contaminated beef and bovine products during the 1990s [ECDC, 2017] and  
69 that this zoonotic transmission of BSE has since led to the death of 178 people with variant  
70 Creutzfeldt-Jakob disease [NCJDRSU, 2019]. Prion diseases can therefore pose serious risks to  
71 both animal and human health and the first detection of a TSE in deer in Europe in 2016  
72 demonstrates the continued need for a global awareness of these diseases [Benestad, 2016].

73 Within the European Union there is a statutory requirement to test for TSEs where disease is  
74 suspected and active surveillance systems to test for disease in healthy slaughter animals or fallen  
75 stock. However, in countries that do not have active surveillance systems, detection of cases relies  
76 on the reporting of clinical suspects where, if the animal keeper or veterinary surgeon are not  
77 familiar with the clinical signs, TSEs may not be considered in the differential diagnosis of  
78 neurological diseases or other conditions that present with similar signs [Konold, 2014]. Prion

79 disease has recently been confirmed in three dromedary camels (*Camelus dromedarius*) from an  
80 Algerian slaughterhouse [Babelhadj, 2018] after clinical signs compatible with those of TSEs in  
81 other species were observed ante mortem. Disease associated pathological changes or prion protein  
82 were found in brain by Western blotting, histology, immunohistochemistry (IHC) and paraffin-  
83 embedded tissue blot; PrP<sup>Sc</sup> was also detected in the lymph nodes of the one camel tested by IHC.  
84 Information gathered from breeders and slaughterhouse personnel suggests that similar clinical  
85 signs had been observed since the 1980s [Babelhadj, 2018]. Subsequently, the disease has also been  
86 reported in a single case of a 12 year old dromedary camel from the region of Tataouine, Tunisia  
87 [Agrimi, 2019; OIE 2019].

88 There are many knowledge gaps about the biological characteristics of this new TSE, termed camel  
89 prion disease (CPD). Detection of infection in lymph nodes of one animal suggests extra-neural  
90 pathogenesis and, therefore, potential transmission of CPD between animals similar to that of  
91 classical scrapie and CWD. Such transmission of CPD could be facilitated over long distances by the  
92 traditional nomadic herding practices of dromedaries and the trade patterns between Algeria and  
93 other countries in North Africa and the Middle East [Bouslikhane, 2015]. In light of the devastation  
94 caused by BSE, and its subsequent zoonotic transmission, CPD was used here to assess the  
95 probability of entry of a novel prion disease agent into the UK via livestock and livestock products.  
96 The approach used was to assess the aggregated probability, using the number of imports per year  
97 to avoid potential under-estimation as has previously been described [Kelly, 2018]. Of note, the  
98 zoonotic potential of the disease is unknown and this assessment is of the probability of  
99 introduction of the CPD agent into the UK only, not of any onward transmission to humans or  
100 animals.

## 101 *Methods*

### 102 *Risk Question and Pathway*

103 The risk question to be addressed was:

104 'What is the aggregated probability of entry of the CPD agent into the United Kingdom from North  
105 Africa or the Middle East in one year?'

106 The risk pathway highlighting the probabilities to be considered for potential entry of the CPD agent  
107 into the UK is shown in Figure 1.

108 The approach used was qualitative and based on the framework set out by the OIE (World  
109 Organization for Animal Health) [OIE 2004]. The probabilities in Figure 1 are conditional and were  
110 expressed qualitatively as *negligible*, *very low*, *low*, *medium*, *high* and *very high* [EFSA, 2006; FAO,  
111 2009]. The qualitative probabilities for each stage of the risk pathway up to, and including, the  
112 probability that an infected animal/animal product is not detected at import ( $p1$ ,  $p2$ ,  $p3$ ,  $p4$ ,  $p5$ ) were  
113 combined as described previously [Gale, 2010] to give the probability of entry of an individual  
114 infected animal/product ( $P$ ). Entry was defined as the probability of entry of a CPD positive animal  
115 or contaminated animal product into the UK within one year taking into account the current products  
116 which are imported from the regions of interest. For comparison, an aggregated probability of entry  
117 ( $Pa$ ) of all categories of live animals/products was also assessed to provide an annual probability of  
118 entry using a graphical reference tool proposed by Kelly *et al.* [Kelly, 2018]. This tool removes some  
119 of the subjectivity that is often associated with deriving the annual qualitative probability of entry for  
120 animal import risk assessments as it enables the number of units imported to be combined with this  
121 individual qualitative event probability. In this way, the reference tool 'considers various qualitative  
122 categories of individual probability and determines the relationship between these probabilities, the  
123 number of imports and the annual probability of entry' [Kelly, 2018].

124 The quantitative bounds for the individual probability correspond to previously published example  
125 definitions [FAO, 2009] (Table 1).

126 Uncertainty associated with the estimates for the probabilities were categorised according to  
127 Spiegelhalter *et al.* [Spiegelhalter, 2011] depending on availability, completeness and quality of  
128 evidence.

129 Relevant data for use in the risk assessment were scarce. Briefly, the number of camel products  
130 imported into the UK from the area of interest was obtained from the EU Trade Control and Expert  
131 System (TRACES) where available. Otherwise, the following assumptions were made:

- 132 • The prevalence of CPD in camels in the region of interest - 3.1% (based on Bablehadj  
133 [Babelhadj, 2018])
- 134 • The incidence and prevalence of CPD in camel products, derived from:
  - 135 ○ Disease progression in camels – similar to scrapie (based on Bablehadj [Babelhadj,  
136 2018])
  - 137 ○ Relative resistance of CPD associated PrP<sup>Sc</sup> to heat and chemicals – similar to other  
138 TSEs (see Results section for references)
  - 139 ○ Correlation of disease presence and PrP<sup>Sc</sup> deposition – similar to other TSEs (see  
140 Results section for references)
  - 141 ○ Systemic distribution of disease – similar to scrapie (based on Bablehadj [Babelhadj,  
142 2018])
- 143 • The number of illegally imported products – based on data on illegal seizures and FAOSTAT  
144 production data
- 145 • The number of processed camel products both legally and illegally imported – assumed by  
146 the author

147 A further assumption made was that the aggregated probability calculations used the same  
148 quantitative bounds [FAO, 2009] as used in the tool by Kelly *et al.* [Kelly, 2018]. It is acknowledged  
149 that this probability could therefore change if these bounds were to be altered.

150

151 *Results*

152 *Risk Assessment*

153 *Probability camel is infected with camel prion disease in exporting country (p1)*

154 Detection of abnormal neurological signs since the 1980s within a restricted geographical area of  
155 Algeria suggests that the expansion of CPD to other areas (and countries) may be restricted or that  
156 the disease can remain largely undiagnosed. According to a recent presentation of the  
157 Mediterranean Animal Health Network, the disease was also reported in Tunisia and the incidence  
158 in the initial region of Algeria was described as ‘rapidly and progressively increasing’ [Agrimi,  
159 2019]. It is, therefore, possible that movement of camels has allowed infected animals to enter other  
160 countries. Besides from the legal trade of camels, approximately 268 million people in Africa  
161 practice some form of pastoralism [Luizza, 2017]. For example, over 95% of cross-border trade  
162 within the Horn of Africa is unofficial and carried out by nomadic pastoralists trading livestock.  
163 Given that disease was first noticed in the 1980s and the nomadic way of life in this area, exporting  
164 countries were therefore considered as those making up the regions of North Africa and the Middle  
165 East for the purpose of this assessment.

166 Twenty of 937 camels in 2015 and 51 of 1,322 in 2016 showed neurologic signs at slaughter giving  
167 an overall estimated apparent prevalence of 3.1% in dromedaries brought for slaughter [Babelhadj,  
168 2018]. In the absence of further information including confirmatory testing, an assumption was  
169 made that the prevalence of CPD in live camels in the regions of interest was *high* with *high*  
170 uncertainty because of the lack of testing data from countries other than Algeria and in only 3  
171 camels in Algeria itself.

172 *Probability infected animal is not detected on farm or at slaughter (p2)*

173 Although anecdotal evidence suggests that herdsmen have noticed neurological signs in camels on  
174 the farm and at slaughter [Babelhadj, 2018] it was assumed that these animals were still being sent  
175 for slaughter and entering the food and feed chains. It was also assumed that as the other countries  
176 in the regions of interest have not been aware of the presence of this disease that they would not be  
177 surveying their animals for clinical signs and therefore animals will still be sent to slaughter. The  
178 probability of a camel with CPD not being detected on farm or at slaughter was therefore assumed  
179 to be *high* with *low* uncertainty.

180 *Probability animal or animal product for export contains the CPD agent given the camel is infected and*  
181 *undetected (p3)*

182 Camel products that can be legally exported to the UK, those for which databases exist to monitor  
183 the levels of exports and the probability of containing the CPD agent (given the source camel is  
184 infected) of these products are shown in Table 2.

185 The probability of a commodity containing the CPD agent depends on the presence of infectivity in  
186 the live animal and processes the commodity has undergone which may destroy it. As such, the  
187 uncertainty associated with this probability for all products was high as a result of knowledge gaps  
188 concerning these two factors.

189 The prion protein, PrP<sup>Sc</sup>, has been shown to accumulate with infectivity and is therefore considered  
190 a reliable biochemical marker for infection [Thomzig, 2007]. PrP<sup>Sc</sup> has been isolated from the  
191 muscle tissue, skin, milk and urine of TSE affected animals [Thomzig, 2007; Andréoletti, 2004;  
192 2011; Chianini, 2015; Buschmann, 2005; Konold, 2013; Rubenstein, 2011; Henderson, 2015] and  
193 the pessimistic assumption here is that CPD distribution in a camel is similar to classical scrapie  
194 and CWD based on the detection of PrP<sup>Sc</sup> in the lymphatic system [Bablehadj, 2018; Haley, 2014].  
195 It was, therefore, estimated that the probability that a camel meat/milk/urine product contains the  
196 CPD agent, given it comes from an infected, undetected animal was *high*.

197 The only milk imported from the region of interest to the UK is Ultra-High temperature treated  
198 (UHT). This processing involves heating to ~135-145°C for 1-10 seconds [Deeth, 2004] which is  
199 not sufficient to fully destroy prion activity [Yoshioka, 2013; Franscini, 2006]. Similarly for  
200 hides/skins, if they are not treated with a transformation process with a proven capacity to reduce  
201 TSE infectivity [SSC 2000], then it is considered unlikely that the CPD agent would be destroyed.  
202 The probability of UHT milk and hides/skins containing the CPD agent, was therefore estimated as  
203 *high*.



204 The European Food Safety Authority (EFSA) considered the risk of TSE transmission associated  
205 with semen and embryos collected from classical scrapie incubating sheep and goats to range from  
206 negligible to low [EFSA, 2010]. PrP<sup>Sc</sup> in semen from a scrapie affected ram has been reported  
207 [Rubenstein, 2012] so the probability of semen from infected undetected camels containing the  
208 CPD agent was estimated to be *low* (worst case assumption based on the EFSA opinion). For hair  
209 PrP<sup>Sc</sup> has been detected in the fibres of the follicular neural network and in the hair follicle isthmus  
210 in hamsters but not in the outer root sheet cells or the bulb region [Thomzig, 2007]. The probability  
211 of camel hair being infected with the CPD agent was therefore assumed to be *negligible* given the  
212 lack of evidence for PrP<sup>Sc</sup> in the cells of the hair.

213 Soap products are described as containing ~ 25% raw camel milk and use a saponifying agent  
214 which starts the process of turning the raw ingredients into soap. This agent is usually 100% sodium  
215 hydroxide which is known to inactivate PrP<sup>Sc</sup> at a concentration of 0.1M [Käsermann, 2003]. The  
216 probability of soap products and lip balm retaining the CPD agent was therefore estimated to be  
217 *negligible*. Chocolate products manufactured using camel milk can contain ~ 21% pure camel milk  
218 powder. Milk powder production involves spray drying milk in a flow of hot air between 180°C to  
219 220°C [CWD 2019], sufficient to destroy prion activity [Somerville, 2011]. The probability of  
220 chocolate being infected with the CPD agent was thus estimated to be *negligible*. Camel milk does  
221 not curdle readily so camel cheese is traditionally consumed in fresh or fermented form.

222 Fermentation is not expected to reduce the levels of infectivity so the probability of cheese from  
223 infected undetected animals being infected with the CPD agent was estimated to be *high*.

224 Products made from treated skins/hides from infected animals are assumed to have undergone a  
225 tanning process whereby the use of strong alkali and acid solutions will reduce the level of TSE  
226 infectivity [Käsermann, 2003; Appel, 2006; Hughson, 2016]. The probability of infection was  
227 therefore assumed to be *very low*. Similarly, although experimental evidence has demonstrated TSE  
228 infectivity in bone marrow [Huor, 2017; Seelig, 2010], during the process of cleaning bones for use  
229 in processed products such as jewellery it is assumed that the bone marrow is removed. The

230 probability of camel bones being infected with the CPD agent, given an animal is infected, was  
231 therefore assumed to be *very low*.

232 *Probability prion in live animal or animal product survives journey to the UK (p4) and is not*  
233 *detected at import (p5)*

234 The probability of prions remaining infectious throughout the journey to the UK was assumed to be  
235 *high* with *low* uncertainty for all products for both legal and illegal routes due to the characteristic  
236 resistance of PrP<sup>Sc</sup> to both chemical and physical degradation [Taylor, 1999] and evidence of its  
237 long term survival [Brown, 1991; Georgsson, 2006]. There are no gross lesions suggestive of TSE  
238 infection in animal products. There are also no post import tests for TSEs in either legal milk  
239 imports or illegal seizures. The probability of CPD infectivity not being detected on import to the  
240 UK was therefore assumed to be *high* with *low* uncertainty for all products for both legal and illegal  
241 routes. Additionally, the annual proportion of searched luggage among the total number of  
242 passengers entering a European country (Switzerland) has been estimated at between 0.06% and  
243 0.24% [Jansen, 2016]. If this is applied to the UK then it suggests that the probability of an illegally  
244 imported infected animal product not being detected at import is *high*.

245 The probability of CPD not being detected in a live animal was considered to be *medium* as  
246 detection will depend on several factors including the animal showing clinical signs of TSE  
247 infection and the signs being correctly diagnosed as TSE by the veterinary inspector. The age of the  
248 animal and the progression of clinical disease will also be relevant. The uncertainty associated with  
249 this estimate was *low*.

250 *Probability of entry of the CPD agent in an individual animal/product into the UK (P)*

251 The probability of entry of the CPD agent in an individual animal/product into the UK was  
252 calculated by combining the probabilities in the risk pathway as described previously [Gale, 2010].  
253 Results are summarised in Table 3 for both legal and illegal routes of entry for live animals and  
254 products.

255 *Number of units imported into the UK per year (n)*

256 Legal exports of live camels, camel meat (including untreated hides), urine and semen from the  
257 regions of interest to the UK are prohibited (Table 2). There were no imports of treated hides from  
258 camels from the region of interest recorded for the period 2010 to 2016 but, as such imports are  
259 permitted, the number of treated hides being exported to the UK was estimated to be within the  
260 range of 0 - 1. Since 2010 there has only been one possible consignment of 'hair' of species 'other'  
261 so may not have been of camel origin but an estimate of 1 unit was used here.

262 The Traces database has details of the volumes of milk and milk products imported into the UK.  
263 Approximately 10,830 kg of UHT milk products (it is assumed that the average product is 1 litre in  
264 size or 1 kg in weight giving a total of 10,830 units) and 11 Kg (equivalent to 22 units based on a  
265 500g product) of cheese were exported to the UK in one year.

266 For processed products, soap, lip balm and milk chocolate made from camel milk are available in  
267 the UK via the internet or instore. Camel bone jewellery and ornaments and leather goods are also  
268 available for sale via the internet. It is assumed that these are all niche products with a limited  
269 market and the number of units of each product imported into the UK was estimated to be 1,000.

270 For illegal imports, data on illegal seizures were used to estimate the number of camel meat and  
271 dairy products illegally entering the UK. Illegal imports of red meat and dairy products are not  
272 categorised by species so, as a proxy for this, data (FAOSTAT) on the production of animals in the  
273 regions of interest were used to predict what percentage of each category would be a camel product.

274 For 2016, camel meat contributed 4.7% to production of all red meat species and camel milk  
275 represented 0.47% of whole milk production (FAOSTAT) in the regions of interest. It is unknown  
276 whether the illegal milk/milk products seized would have undergone any heat treatment, but as  
277 stated above, UHT would not destroy infection. Using the illegal seizure data and FAOSTAT  
278 production data it was estimated that 242 units (200g products) of camel meat, 19 units (1Kg  
279 product) of milk and 20 units (500g product) of cheese illegally enter the UK in one year.

280 The number of illegal imports of treated skins/hides and hair was estimated to be between 0 -100  
281 due to the size of the commodity and the low value placed on camel skins in the region of interest.  
282 The same figure was used for camel urine which has been used as a traditional medicine since  
283 ancient times [Abdel Gader, 2016] so it is possible that passengers entering the UK could illegally  
284 import camel urine for medicinal purposes.

285 For semen, there are difficulties associated with the application of artificial insemination in  
286 camelids in particular the collection and handling of semen due to the viscous nature of the seminal  
287 plasma [Skidmore, 2018]. Therefore the estimate for the number of illegal camel semen straws  
288 imported to the UK was between 1-10. The illegal import of batches of camel hair was also  
289 estimated to be between 1 - 10 due to the low value placed on camel hair in the region of interest.

290 The number of illegal imports of all processed products was estimated to be between 0 - 1000  
291 assuming these are luxury products aimed at a niche export market.

292 *Aggregated probability of entry of the CPD agent into the UK from North Africa or the Middle East*  
293 *per year (Pa)*

294 The aggregated annual probability of entry of the CPD agent was estimated using the number of  
295 units of animals/products imported per year where known (or estimated by the authors where  
296 unknown) and the qualitatively assessed probability of entry for an individual infected product  
297 (Table 3) using the graphical framework described by Kelly *et al.* [Kelly, 2018].

298 For legal imports, the aggregated probability of entry was negligible for livestock, camel meat,  
299 urine and semen as these products are prohibited (Table 4). The probability was also negligible for  
300 hair, soap, lip balm and chocolate based on the assumed lack of infectivity in these products and the  
301 number of products imported. For cheese and UHT milk the probability of at least one infected unit  
302 entering the UK per year was high and very high respectively. The individual probability per unit  
303 for UHT milk increased from high to an aggregated probability of very high as a result of the  
304 number of units imported ( $>10^4$ ) in one year.

305 The number of units per product illegally imported to the UK was estimated by the authors due to  
306 lack of data. This resulted in a range of probabilities for some products, from negligible if no items  
307 were imported to very high if 100 products were imported (treated hides/skins, urine) (Table 5).  
308 Milk products and cheese both had a high probability of entry and camel meat had a very high  
309 probability based on the estimated number of products imported.

### 310 *Discussion*

311 This assessment used the example of CPD to address the probability of entry of a novel prion agent  
312 into the UK. The estimated probability per unit was aggregated to take into account the number of  
313 units of each product imported per year. Thus the predicted probability is the probability of entry of  
314 one or more (i.e. at least one) infected unit per year into the UK. The predicted aggregated  
315 probability for legal imports was highest for UHT milk products and cheese whilst for treated hides  
316 and skins it was estimated to range from negligible to high depending on whether any units were  
317 imported in one year. For illegally imported meat, milk and cheese products the aggregated  
318 probability of at least one entry event per year was estimated as very high, high and high  
319 respectively. If testing were to be carried out to negate the presence of CPD in the camel population  
320 used to produce milk legally exported to the UK then the annual probability of entry would be  
321 reduced to negligible. Similarly, as the aggregated probability is based on an example of assumed  
322 quantitative bounds [FAO, 2009], were these bounds to be changed then the aggregated probability  
323 could also change.

324 The estimates of probability are associated with high uncertainty throughout the risk pathway  
325 hinging, in particular, on the application of a blanket prevalence of CPD within the camel  
326 population. The Middle East Respiratory syndrome coronavirus (MERS-CoV) provides an example  
327 of an undetected pathogen in camels which, once identified, has since been detected throughout  
328 much of the regions of interest suggesting that movement of camels has provided a route of  
329 incursion of the virus to different countries [Reusken *et al.*, 2013; Haagmans *et al.*, 2014; Meyer *et*  
330 *al.*, 2014; Reusken *et al.*, 2014]. It is possible that transmission of CPD between animals could have

331 similarly been facilitated by movement of infected live animals although the disease has currently  
332 only been described in a restricted geographical area of Algeria and Tunisia. The involvement of  
333 lymphoid tissue, observed in both the Algeria and Tunisia cases, is suggestive of a peripheral  
334 pathogenesis, similar to scrapie and CWD in which horizontal transmission occurs efficiently under  
335 natural conditions [OIE 2019]. The uncertainty is compounded by lack of data on the epidemiology  
336 of CPD. As of June 2020, there is no publically available up-to-date information with regards to the  
337 prevalence of CPD in the area of interest or whether additional cases have been detected. The OIE  
338 Scientific Commission has called for the collection of further scientific evidence in countries with  
339 dromedary camel populations to measure the impact of the disease [OIE 2019]. This could  
340 influence the results of the risk assessment should an increase in the incidence of CPD have  
341 occurred.

342 The import of animal products in travellers' personal consignments presents a considerable risk of  
343 introducing infectious agents [ Simons *et al.*, 2016; Hartnett *et al.*, 2007; Falk *et al.*, 2013]. Analysis  
344 from a study on illegal seizures of airline passengers in Germany, found that seizures are typically  
345 local foodstuffs reflecting culturally enrooted consumption patterns. Camel milk and meat are  
346 esteemed in the regions of interest for their medicinal properties; camel meat is also frequently  
347 eaten on special occasions or for ritual celebrations [Jansen *et al.*, 2014]. It is, therefore, not  
348 unreasonable to assume that a proportion of illegal seizures of milk products and red meat originate  
349 from camels.

350 Significant knowledge gaps exist about prion disease in camels. Although PrP<sup>Sc</sup> is believed to be  
351 the most useful marker of TSE disease identified to date, it has also been shown that its presence  
352 does not always directly correlate with infectious titres and that bioassay is still required for  
353 verification of infection [Chianini *et al.*, 2015]. So far, this has not been reported for CPD. The  
354 relative heat resistance of camel prions is also unknown, a factor which could affect the risk  
355 pathway if it were proven to show a greater susceptibility to heat than BSE or scrapie prions.  
356 Disease progression in CPD could also affect the risk pathway, specifically the prevalence of

357 infection in camel products, if the slaughter age of most camels is young and disease is only  
358 detected in older animals. Likewise, products from animals with CPD but not yet showing clinical  
359 signs could also contribute to the probability of entry; this is particularly important regarding the  
360 long incubation period of the prion diseases. Further research to gain a better understanding into the  
361 CPD agent behaviour and improvement of the market traceability of camel products may alter the  
362 probability estimates stated here and should be considered in future risk assessments.

363 In conclusion, this paper assesses the annual probability of at least one entry event of camel  
364 products containing the CPD agent into the UK. The probability of entry from the Middle East or  
365 North Africa was considered to be highest from legal import of milk and cheese and the illegal  
366 import of camel meat, milk and cheese. These estimates are associated with high uncertainty due to  
367 the number of assumptions made throughout the risk pathway in particular the prevalence of CPD  
368 in camels, and of the CPD agent in camel products, and the number of products illegally entering  
369 the UK. However, this assessment does not consider the consequence of the exposure of uninfected  
370 animal populations to these products, only the probability of entry of the agent. Therefore, whilst a  
371 high probability of entry of the CPD agent has been estimated for some products, whether there is a  
372 subsequent probability of onward transmission is unknown [Fryer 2011]. The zoonotic potential of  
373 CPD is unknown but there is currently no evidence of zoonotic transmission of TSEs other than  
374 BSE to humans. Further research to look at the zoonotic potential and risks to public health would  
375 be beneficial.

376 **Funding:** “This work was funded by Defra, Scottish Government and Welsh Government through  
377 funding to the APHA Project ED1043 Enhancing surveillance, facilitating and improving outbreak  
378 response and informing policy”

379 **Declarations of interest: none**

380 **Ethics statement:** The authors confirm that the ethical policies of the journal, as noted on the  
381 journal's author guidelines page, have been adhered to. No ethical approval was required as this is a  
382 risk assessment article with no original research data.'

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517 Table 1: Definitions of the quantitative bounds used to correspond to the qualitative probability (taken  
 518 from [12])

Qualitative level	Quantitative bounds	Quantitative bounds (%)
Negligible (N)	Indistinguishable from 0	Indistinguishable from 0%
Very Low (VL)	$<10^{-4}$ , except 0	$<0.01\%$ , except 0%
Low (L)	$10^{-3}$ to $10^{-4}$	0.1% to 0.01%
Medium (M)	$10^{-2}$ to $10^{-3}$	1% to 0.1%
High (H)	$10^{-1}$ to $10^{-2}$	10% to 1%
Very High (VH)	$>10^{-1}$ , not 1	$>10\%$ , not 100%
Certain	1	100%

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520 Table 2: Probability of containing the CPD agent for individual commodities originating from  
 521 camels including primary and processed products.

Commodity	Primary product used	Import to the UK allowed from regions of interest	Traceable (source)	Probability of containing the CPD agent (uncertainty in brackets)
<b>Live animals</b>				
Live camels	-	No	-	Certain
<b>Primary products</b>				
Meat	-	No	-	High (high)
Milk	-	Yes	Yes (Traces)	High (high)
Hair	-	Yes	Yes (Traces)	Negligible (high)
Urine	-	No	-	High (high)
Semen	-	No	-	Low (high)
Treated Hides and skins	-	Yes	Yes (Traces)	High (high)
<b>Processed products</b>				
Soap	Milk	Yes	No	Negligible (high)
Lip balm	Milk	Yes	No	Negligible (high)
Chocolate	Milk	Yes	No	Negligible (high)
Leather products	Skin	Yes	No	Very low (high)
Cheese	Milk	Yes	Yes (Traces)	High (high)
Bone ornaments	Bone	Yes	No	Very low (high)

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525 Table 3: Probability of entry (*P*) of an infected camel or camel product for both legal and illegal pathways (uncertainty in brackets)

Probability	Livestock	Camel meat	UHT Milk products	Treated hides/skins	Urine	Semen	Hair	Soap and lip balm/Chocolate	Cheese	Bone/skin products
Camel Infected	High (High)	High (High)	High (High)	High (High)	High (High)	High (High)	High (High)	High (High)	High (High)	High (High)
Not detected	High (High)	High (High)	High (High)	High (High)	High (High)	High (High)	High (High)	High (High)	High (High)	High (High)
Animal or animal product (per unit) for export contains CPD agent	Certain (High)	High (High)	High (High)	High (High)	High (High)	Low (High)	Negligible (High)	Negligible (High)	High (High)	Very low (High)
Prion survives journey to UK	High (Low)	High (Low)	High (Low)	High (Low)	High (Low)	High (Low)	High (Low)	High (Low)	High (Low)	High (Low)
Not detected on import	Medium (Low)	High (Low)	High (Low)	High (Low)	High (Low)	High (Low)	High (Low)	High (Low)	High (Low)	High (Low)
Entry for individual infected product	Medium (Low)	High (High)	High (High)	High (High)	High (High)	Low (High)	Negligible (High)	Negligible (High)	High (High)	Very low (High)

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530 Table 4: Aggregated probability of entry ( $P_a$ ) of CPD infected animals/animal products via legal import with associated uncertainty in brackets using  
 531 the method of Kelly *et al.* [9] \*estimated by the authors

Legal	Livestock	Camel meat	UHT Milk products	Treated hides/skins	Urine	Semen	Hair	Soap and lip balm/Chocolate	Cheese	Bone/skin products
Entry for individual infected product	Medium (Low)	High (High)	High (High)	High (High)	High (High)	Low (High)	Negligible (High)	Negligible (High)	High (High)	Very low (High)
Number of units imported	0 (animals)	0 (200g product)	10830 (1 kg product)	0 – 1 (skins)	0 (500g product)	0 (straw)	1 (1 batch)	1,000* (item)	22 (500g product)	1,000* (items)
Aggregated probability of entry into the UK	Negligible (High)	Negligible (High)	Very high (High)	Negligible - High (High)	Negligible (High)	Negligible (High)	Negligible (High)	Negligible (High)	High (High)	Very low (High)

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533 Table 5: Aggregated probability of entry ( $P_a$ ) of CPD infected animals/animal products via illegal import with associated uncertainty in brackets using  
 534 the method of Kelly *et al.* [9] \*estimated by the authors

Illegal	Livestock	Camel meat	Milk products	Treated hides/skins	Urine	Semen	Hair	Soap and lip balm/Chocolate	Cheese	Bone/skin products
Entry for individual infected product	Medium (Low)	High (High)	High (High)	High (High)	High (High)	Low (High)	Negligible (High)	Negligible (High)	High (High)	Very low (High)
Number of units imported	0-10* (animals)	242* (200g product)	19* (1 kg product)	0 – 100* (skins)	0 – 100* (500g product)	0 – 10* (straw)	0 – 10* (1 batch)	0 - 1,000* (item)	20* (500g product)	0 - 1,000* (items)
Aggregated probability of entry into the UK	Negligible - Medium (High)	Very high (High)	High (High)	Negligible – Very high (High)	Negligible - very high (High)	Negligible - Low (High)	Negligible (High)	Negligible (High)	High (High)	Negligible - Very low (High)

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536 Figure legends

537 Figure 1: Risk pathway for the aggregated probability of entry of the CPD agent into the UK in one  
538 year

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