

Questionnaire review of meat inspection.

1. INTRODUCTION

Meat inspection is to check animals, both live and slaughtered, to decide if their meat is fit for human consumption. These checks are performed by, or under the supervision of, government veterinarians and include also animal health and animal welfare controls. The current rules on meat inspection are laid down in Regulation (EC) No 854/2004.

Within the legislation on meat inspection flexibility is provided for. Based on epidemiological or other data from the holding, for example pigs kept under controlled housing conditions may be visually inspected. Flexibility is also provided for the testing of pigs on trichinella; fattening pigs from free holdings and regions with a negligible risk do not have to be tested . Besides these specific rules for meat inspection, there are general requirements on official controls in Regulation (EC) No 882/2004.

Revision of meat inspection

Meat inspection was designed to address diseases caused by eating meat which were a substantial public health risk at the time. The most important diseases were tuberculosis, brucellosis and trichinellosis.

The situation regarding tuberculosis, brucellosis and trichinellosis has been since then enormously improved. But over time new public health risks emerged like Campylobacter and Salmonella which the classic meat inspection at the level of the slaughterhouse only partly addresses. That is why meat inspection is up for revision.

The revision of meat inspection in order to meet the needs of today has increasingly been discussed in many forums over the last 10 years.

- In response to that in 2009 Council conclusions have led to the Commission putting the risk-based meat inspection on the agenda.
- The Commission asked EFSA for an opinion on risk-based meat inspection, which will be the basis for a possible legislative proposal.
- The Commission also organises roundtable conferences on this revision of meat inspection.

During the last two Roundtable Conferences several participants expressed their views on the revision of meat inspection, but a number of participants did not take a position.

The purpose of this questionnaire is to collect the views of all participants to the Roundtable Conferences.

It will be helpful to know all these positions when drafting a legislative proposal after the EFSA opinion on pigs will be available by June 2011.

The goal is to create a harmonized meat inspection which will enable the free movement of meat in the internal market, even though Member States may have certain flexibility on the implementation based on harmonised conditions. An example of this is Trichinella which is a greater risk in some Member States than in others, which for high and low risk Member States will be reflected in a difference in the number and intensity of controls carried out.

QUESTIONNAIRE

General

- This questionnaire does not in anyway represent a position of the Commission.
- Please respond by the latest on 01 April 2011.
- Please provide your information via bullet points when filling out the free text boxes.

- In order to be able to analyse the replies to the questionnaire, every Member State or European stakeholders' organisation is requested to coordinate the answers amongst its members in order to have one single reply per Member State or European stakeholders' organisation.
- For the same reason it is necessary that every respondent clearly states name, organisation, contactperson and country of origin as applicable.
- For questions about the technical use of the questionnaire you can contact Rebecca Vanhecke, SANCO, Brussels, 0032 2 298 40 95, rebecca.vanhecke@ext.ec.europa.eu
- For questions about the content of the questionnaire you can contact Arie Ottevanger, SANCO E2, Brussels, 00 32 2 295 56 20, arie.ottevanger@ec.europa.eu
- Privacy statement

2. General information of respondent > Yellow highlighted FVE responses

2.1 Please indicate if you are a competent authority or a European stakeholders' organisation.

a. Competent authority

b. European stakeholders' organisation

2.2 Please provide the name, telephone number and e-mail address of your contact person.

FVE Rue Defacqz 1 Bruxelles

3. Content of inspection

3.1 If additional hazards are identified by the EFSA as a priority to be included in meat inspection (e.g. *Salmonella*, *Campylobacter*, *Yersinia*, *Toxoplasma*...), how should it be tested:

a. Sampling/testing by the FBO, results available at establishment/holding

b. Sampling/testing by the FBO, results to be communicated systematically to competent authorities

c. Sampling/testing by the competent authority

d. No additional sampling/testing should be made mandatory

3.2 If additional hazards are identified by the EFSA as a priority to be included in meat inspection (e.g. *Salmonella*, *Campylobacter*, *Yersinia*, *Toxoplasma*...), should the health status of the group of animals for these pathogens be available before slaughter allowing possible hygiene measures at slaughter level.

e. YES.

f. NO

3.2.1 If yes for which additional hazards: (multiple reply):

- i. *Toxoplasma* in pigs
- ii. *Toxoplasma* in small ruminants
- iii. *Salmonella* in poultry
- iv. *Salmonella* in pigs
- v. *Salmonella* in ruminants
- vi. *Campylobacter* in poultry
- vii. *Campylobacter* in other species
- viii. *Yersinia* in pigs
- ix. Other:
- x. None

3.2.2 If Other, Please specify (compulsory)

Given that it depends on a risk based approach, it should be considered *E. Coli verotoxinogenic* and *Echinococcus spp.* Additional sampling should be part of the Food Safety Management system run by FBOs therefore should not be mandatory. In addition this list needs to be flexible in order to add other potential and proven hazards. In small ruminants *Toxoplasma sp.* will be typically present in certain individuals and not in the whole herd; sampling would therefore be too expensive.

3.3 If additional hazards are identified by the EFSA as a priority to be included in meat inspection (e.g. *Salmonella*, *Campylobacter*, *Yersinia*,...), should the test result be taken into account when declaring the meat fit for human consumption?

g. YES.

h. NO

3.3.1 If yes for which additional hazards: (multiple reply):

- i. *Toxoplasma* in pigs
- ii. *Toxoplasma* in small ruminants
- iii. *Salmonella* in poultry
- iv. *Salmonella* in pigs
- v. *Salmonella* in ruminants
- vi. *Campylobacter* in poultry
- vii. *Campylobacter* in other species
- viii. *Yersinia* in pigs
- ix. Other:

3.3.2 Please specify (compulsory)

Given that it depends on a risk based approach, *E. Coli verotoxinogenic*, *Echinococcus* spp.

3.4 Do you consider that visual inspection can be extended to more species?

- i. YES, for all species/categories/age/groups
- j. YES under certain conditions and/or for certain species/categories/age groups (clarify in textbox below)
- k. NO

3.4.1 Please specify (compulsory)

Visual inspection shall be based on the food chain information (FCI) taking into consideration well known and big enough flocks, the health status of the holding, region or country. It can be extended to that livestock raised in batches and slaughtered before the age of reproduction. This visual inspection should be completed by a strengthened monitoring at farm level; in the slaughterhouse a strengthened inspection should be planned in case of exceeded criteria of alert.

3.5 For which pathogens, do you consider that a differentiation of meat inspection based on the level of infection in a country/region may be relevant: (multiple reply):

- l. Toxoplasma
- m. Cysticercus
- n. Tuberculosis
- o. Brucellosis
- p. Salmonellosis
- q. Campylobacteriosis
- r. Other:
- s. None

3.5.1 Please specify (compulsory)

If epidemiological investigations prove absence from a certain disease, prophylaxis or eradication program have been effective and regular routine checks in the slaughterhouse is not necessary. However some kind of surveillance might need to be in place.

3.6 Do you agree that meat inspection could differ from one Member State to another, based on EU harmonised epidemiological criteria?

- t. YES,
- u. YES under certain conditions (clarify in textbox below)
- v. NO

3.6.1 Please specify (compulsory)

3.7 Do you agree that a similar approach is used in third countries based on epidemiological criteria if considered equivalent?

w. YES,

x. YES under certain conditions (clarify in textbox below)

y. NO

3.7.1 Please specify (compulsory)

4. Organisation of inspection

4.1 Are you in favour in slaughterhouses of a differentiation based on a bonus/malus system, reflecting the outcome of audits, as regards:

- a) frequency of official controls
- b) responsibilities of slaughterhouse staff
- c) presence of competent authorities
- d) Presence of official veterinarians
- e) Other:
- f) None of these suggestions

4.1.1 Please specify (compulsory)

Even good establishments with good systems in place can be under commercial pressure especially when there are no independent inspectors. The most important factor in the quality of controls carried out by FBOs as well as the quality of the management which is the most difficult thing to measure and for the management to accept.

4.2 Are you in favour of flexibility on the presence of the official veterinarian when harmonized alert criteria are applied which require the intervention of the official veterinarian?

a. YES,

b. YES under certain conditions and/or for certain species (clarify in textbox below)

c. NO

4.2.1 Please specify (compulsory)

Conditions, under an EU harmonized framework, should be set up by Competent Authorities especially when considering small establishments with discontinuous slaughtering. Small slaughterhouses have to appoint their own registered veterinarian.

4.3 Are you in favour of flexibility on the permanent presence of the competent authorities when meat inspection is carried out by slaughterhouse staff and harmonized alert criteria are applied which require the intervention of competent authorities?

a. YES,

b. YES under certain conditions and/or for certain species (clarify in textbox below)

c. NO

4.3.1 Please Specify (compulsory)

Conditions, under an EU harmonized framework, should be set up by Competent Authorities especially when considering small establishments with discontinuous slaughtering

4.4 Are you in favour of allowing ante-mortem inspection of **all species** to be carried out by the official or approved veterinarian at the holding of provenance?

a. YES,

b. YES under certain conditions/for certain species (clarify in textbox below)

c. NO

4.4.1 Please specify (compulsory)

It should not replace ante mortem in the slaughterhouse which is important also for animal welfare reasons, infact welfare checks at the Slaughterhouse are necessary. It can give credibility to the system thus increasing consumers` confidence. However, in low capacity slaughterhouses close to the farms, routine might be modified given that pre-slaughter checks at the slaughterhouse by a veterinarian is of high importance. This is possible under specific conditions and accordingly organised meat safety control system also in case of highly integrated farm-slaughterhouse activities with short delivery distances and direct supply.

In addition ante-mortem at the holding of provenance should be carried out to check the authenticity of the FCI; FVE already advocates the importance of a full implementation and use of the Food Chain Information and supports the concept of the “Herd Health Plan”.

http://www.fve.org/news/position_papers/public_health/fve_10_054_hhplan_uevh_uevp_final_2010%20%282%29.pdf

4.5 Are you in favour of allowing ante-mortem inspection of **all species** to be carried out by the official or approved veterinarian at collection centres?

a. YES,

b. YES under certain conditions/for certain species (clarify in textbox below)

c. NO

4.5.1 Please specify (compulsory)

At collection centres and markets there is a great risk that the food chain information is lost or that risks which are not within the information concerning an individual or a flock of animals, may occur. See final comments

4.6 Should the flexibility provided for as regards the presence of the official veterinarian during post-mortem inspection in an establishment Carrying out discontinuous slaughter be extended to ante-mortem inspection

a. YES,

b. YES under certain conditions (clarify in textbox below)

c. NO

4.6.1 Please specify (compulsory)

5. Distribution of responsibilities

5.1.1 Should pilot projects related to the presence of the competent authorities in slaughterhouses,

a. Be limited to adaptations to Annex I of Regulation (EC) No 854/2004 (current situation)?

b. Be extended to further adaptation in particular:

5.2 Please select all concerned:

- i. decisions concerning fitness for human consumption and placing on the market may be taken by official auxiliaries if no deficiencies were found during inspection
- ii. decisions concerning fitness for human consumption and placing on the market may be taken by the food business operator if no deficiencies were found during inspection
- iii. assistance of slaughterhouse staff in other species than poultry and lagomorphs similar to the conditions for these species
- iv. Other:

5.2.1 Please specify (compulsory)

5.3 What do you consider as the minimum tasks/responsibilities of the official veterinarian concerning the verification of food chain information? (Please select one)

- Personally
- By official auxiliaries, who alerts the official veterinarian if uncertainty/possible non-compliance
- By slaughter house staff (in species where delegation to staff is allowed), who alerts the official veterinarian if uncertainty/possible non-compliance

5.4 What do you consider as the minimum tasks/responsibilities of the official veterinarian concerning ante-mortem inspection? (please select one)

- Personally
- Initial checks and help with purely practical tasks by the official auxiliaries, completed by the official veterinarian
- By official auxiliaries, who alerts the official veterinarian if uncertainty/possible non-compliance
- Initial checks and help with purely practical tasks by the slaughterhouse staff (in species where delegation to staff is allowed), completed by the official veterinarian
- By slaughter house staff (in species where delegation to staff is allowed), who alerts the official veterinarian if uncertainty/possible non-compliance

5.5 What do you consider as the minimum tasks/responsibilities of the official veterinarian concerning post-mortem inspection? (please select one)

- Personally
- By official auxiliaries, who alerts the official veterinarian if uncertainty/possible non-compliance + regularly checks each day of the work of the official auxiliaries
- By official auxiliaries, who alerts the official veterinarian if uncertainty/possible non-compliance.
- By slaughterhouse staff (in species where delegation to staff is allowed), who alerts the official veterinarian if uncertainty/possible non-compliance + regularly checks each day of the work of the slaughterhouse staff by the official veterinarian.
- By slaughter house staff (in species where delegation to staff is allowed), who alerts the official veterinarian if uncertainty/possible non-compliance.

5.6 What do you consider as the minimum tasks/responsibilities of the official veterinarian concerning auditing tasks? (please select one)

- By official veterinarians/personally
- By official auxiliaries, who alerts the official veterinarian if uncertainty/possible non-compliance + regularly checks each year of the work of the official auxiliaries by the official veterinarian.
- By official auxiliaries, who alerts the official veterinarian if uncertainty/possible non-compliance

5.7 For which species, specific tasks of meat inspection, other than specific sampling and testing tasks, can be delegated to slaughterhouse staff? (Multiple reply):

- a) Poultry
- b) Lagomorphs
- c) Piglets
- d) Pigs
- e) Calves below (complete with age)
- f) Other domestic cattle
- g) Lamb
- h) Sheep
- i) Kid
- j) Goat
- k) Horses
- l) Farmed game
- m) Wild game
- n) None
- n) Others, please specify:

5.7.1 Please specify age of calves (compulsory)

It does not matter. Specific tasks can be carried out by slaughter staff provided that they receive adequate training supervised by CAs; each individual slaughterhouse has to get authorisation for that in accordance with strict EU criteria.

5.7.2 Please specify other species (compulsory)

5.8 Do you consider the detection and removal of pathological abnormalities which are not a public health risk, a task for the food business operator?

- a. YES,
- b. YES under certain conditions (clarify in textbox below)
- c. NO

5.8.1 Please specify (compulsory)

Provided that information flow between Official Vets and FBOs is effective. Food Chain Information is obviously the key requisite.

5.9 Should the following activity be included in a (future) definition of 'meat inspection'?

	Yes	No
5.9.1 Activities carried out in the slaughterhouse or food processing plant by competent authorities or under the supervision (requiring presence) of competent authorities.	X	

5.10 Which one of the following self check activities do you consider to be included in a (future) definition of 'meat inspection'?

	Yes	No
5.10.1 Self checks carried out in the slaughterhouse by food business operators verified by a minimum requirement for checks by	X	

the competent authority and audited by the competent authority.		
5.10.2 Self checks carried out in any other food processing plant by food business operators verified by a minimum requirement for checks by the competent authority and audited by the competent authority.	X	
5.10.3 Self checks carried out in the slaughterhouse by food business operators, audited by the competent authorities with alert criteria for verification by the competent authority.	X	
5.10.4 Self checks carried out in any other food processing plant by food business operators audited by the competent authorities with alert criteria for verification by the competent authority.	X	

5.11 Which one of the following sampling activities do you consider to be included in a (future) definition of 'meat inspection'?

	Yes	No
5.11.1 Sampling/inspection activities at primary production by competent authorities.	X	
5.11.2 Sampling activities at primary production by food business operators, verified by a minimum requirement for sampling by the competent authority at the same stage.	X	
5.11.3 Sampling activities at primary production by food business operators, verified by a minimum requirement for sampling by the competent authority at the same or another (e.g. slaughterhouse) stage.	X	
5.11.4 Sampling activities at primary production by food business operators, without any minimum requirement for sampling by the competent authority.		X

6. Further comments

In relation to question 3.1 it should be considered the following:

Testing of additional hazards depends on the size of farms and slaughterhouses, evaluation of the presence of the hazards, trade characteristics (local, regional, EU, export), national economics etc. Monitoring programmes run by MSs don't cover all farms each year and small farms and slaughterhouses are mostly not covered at all. Sampling/testing can be carried out by the competent authority in case of small farms and slaughterhouses and based on risk assessment. Small slaughterhouses shall be taken into account.

As regards section 4, question n 4.5, it should be noted that at collection centres and markets there is a great risk that the food chain information is lost or that risks which are not within the information concerning an individual or a flock of animals, may occur.

Given that any change is conditional and that at stake is a risk based differentiation of meat inspection rather than only modernisation, with regard question 5.9, FVE believes that large amount of activities are currently considered as "meat inspection" nonetheless it would be more consistent taking into account a broader definition and terminology such as "Meat Safety Controls".