



MEAT INSPECTION AND THE DEVELOPMENT OF COMMUNITY RISK BASED FOOD LEGISLATION

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FVE supports the objective and the approach of increasing food safety by reducing microbiological hazards in meat and of proceeding to a scientific re-assessment of the traditional meat inspection.

FVE also strongly supports the view that the new inspection system must accommodate animal health and animal welfare needs together with public health.

Public health, animal health and animal welfare are indeed interrelated and require a holistic approach. As an example of this, stressed animals are more likely to develop diseases, which will require veterinary treatment, however this may increase the presence of residues in the animal produce, which in turn may affect public health.

This example highlights the link between animal welfare, animal health and public health. Hence the need that the new inspection system include these three elements.

However, FVE strongly believes that the 'stable to table' approach to food safety also requires a two-way communication throughout the food chain from the farm to the consumer and through the Official Veterinary Surgeon. This would need the development of schemes enabling full traceability of food products from the animal to the consumer plate. Albeit ambitious, this approach is the only way to optimise meat and food inspection and to allow for corrective actions to be taken, thus ensuring the highest level of consumer protection.

However, the difficulties in implementing the new proposed system should not be underestimated. FVE feels that it will not be possible to implement a unique system throughout Europe. In many countries small farms and small slaughterhouses play an important role in the food-chain supply and are important for the cohesion and life of many rural areas. As these small establishments are unlikely to fit into the new proposed approach, it would be important to maintain the two systems in parallel. Traditional meat inspection can still be performed in those facilities unsuitable for the implementation of modern inspection systems.

The conditions under which this new system can function must also be defined. Certainly, the obligation to have a Code of Practice to include requirements relating to for instance, animal husbandry or the prudent use of antibiotics in place at farm level would be one such condition.

Yet, although veterinary surgeons would have a key role in ensuring that such a Code of Practice is observed at farm level, this role has regrettably been forgotten in the current

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discussions and in particular in the Commission proposals on hygiene. Veterinary surgeons have major responsibilities in legislation e.g. the medicines directive (Council Directive 81/851/EEC), the residues directive (Council Directive 96/23/EEC) and animal welfare and public health legislation.

All these directives and regulations must be linked together and an audit trail developed from the farm to the consumer and throughout the food chain.

Reduction of Microbiological Hazards in Meat

Hazard identification

FVE agrees with the list of main hazards. This list should however be regularly updated on the basis of epidemiosurveillance data, such as those obtained through the measures contained in Council Directive 92/117/EEC on zoonosis.

Prevalence of hazards

FVE can support the proposed approach.

Risk management options

FVE can support the proposed approach.

Primary production

FVE supports the introduction of targets for the reduction of specified zoonosis at the level of the primary production.

Actions to be taken

FVE agrees that discussions are needed in relation to the introduction of a final decontamination step where correct implementation hygiene measures do not result in the appropriate pathogen reduction.

FVE believes however that a number of points would require clarification before such discussion can take place. For instance, the re-contamination of carcasses having undergone decontamination, the effect on the shelf-life of treated food, the impact on the organoleptic characteristics and, last but not least, consumer perception.

Before these are clarified, FVE considers that decontamination of carcasses should not be allowed.

Should decontamination prove to be an acceptable procedure, FVE considers that decontamination should however never replace good hygiene practices in slaughterhouses and farms.

Re-assessment of classical meat inspection

Re-assessment of hazards

Homogeneity of groups of animals

FVE considers that the proposal to perform detailed inspection in a limited number of animals from a homogeneous group of pigs or veal calves is not compatible with the objective of including animal health and welfare elements as well as public health in the meat inspection process.

In limiting inspection to a representative sample of animals, it might be possible to control residue levels or pathogens such as salmonella or E. coli. However, it will be more difficult to monitor lesions, which might not have much importance for public health, such as abscesses or broken legs, but which may be good indicators of husbandry, transport or slaughter conditions, and thus be pertinent from the animal health and welfare aspects.

FVE would therefore recommend maintaining the individual inspection in pigs and veal calves.

Availability of health information from the farm

Any future system of inspection should be based on risk assessment so that resources can be best allocated and focused on critical points of the food chain. However, to ensure an optimal use of the resources and to enable post-mortem inspection to be adapted to the risks identified, it is essential to have a permanent flow of information between the farm of origin of the animals or animals produce and the slaughter or processing facilities. The level of risk will indeed be primarily determined by the health status of the farm of origin, which will, in turn, result in different risk management procedures at the slaughter or processing facilities.

This information flow is a critical element of a 'stable to table' approach to food safety. It must however be a two-way communication system so that pertinent information is going from the farm of origin to the Official Veterinary Surgeon at the slaughterhouse but also backwards. Thus, any findings during the post-mortem inspection are reported to and can be addressed at the farm level by the veterinary surgeon attending the animals.

In such a system, some of the information necessary to the ante-mortem inspection could be collected by the veterinary surgeon attending the animals at the farm of origin and then transferred to the Official Veterinary Surgeon at the point of slaughter. The veterinary surgeon would for instance know whether the animal welfare rules have been complied with at farm level or whether rules on veterinary medicinal products have been observed. The Official Veterinary Surgeon could then decide on how to adapt the post-mortem inspection in the light of the ante-mortem inspection findings and of the history of the farm of origin.

The involvement of veterinary surgeons attending the animals at the farm of origin is likely to deliver an increased value to the ante-mortem inspection. These veterinarians have a better knowledge of the animals and of their farm than any Official Veterinary Surgeon who by the very nature of the ante-mortem inspection will be called only once to examine the animals.

The Commission has indicated that it would consult the Scientific Committee for re-designing the current ante- and post-mortem meat inspection systems. FVE is inviting the Commission to consider in particular how the information available to the veterinary surgeon attending the animals at the farm of origin could be collected and made available to

the Official Veterinary Surgeon for the purpose of the ante- and post-mortem meat inspection.

Avoiding prescription of incision and palpation techniques

FVE can support the proposal that the Scientific Committee should be consulted on the pros and cons of removing mandatory incision and palpation techniques.

However, Official Veterinary Surgeons must retain the decision to perform or not an incision or a palpation if, based on their professional judgement, they deemed such a procedure necessary.

Also, it should not be forgotten that some of these incision and palpation techniques bring information, which may be lost if these techniques were to be abandoned altogether. For instance, when tuberculosis prevalence is low, the tuberculin test is no longer mandatory and can be replaced by controls at the slaughterhouse, controls, which are based on incision techniques.

Another example is the incision of pig hearts, which may be an opportunity for transfer of salmonella during this operation. In that particular case, the two risk factors must be taken into account before deciding whether or not to allow incision and palpation techniques.

Also, the decision to perform incision and palpation techniques or not should be eased by the availability of information on the health status and history of the farm of origin of the animals.

Lastly, FVE would support the development of statistical systems to monitor findings at slaughterhouses. Diseases and lesions found could thus be recorded, as well as the outcome of incision and palpation techniques.

Inspection carried out by establishment employees or by accredited bodies

FVE strongly believes that the task of guaranteeing food safety and public health is ultimately a public service even though food operators must bear the responsibility for the safety of products that they place on the market.

FVE therefore supports the introduction of own-checks controls by the food-operators. These controls would fit into the general implementation of HACCP systems and would contribute to increase the safety of food. The food operators themselves could perform these controls, just as internal audit procedures are carried out in many other industries.

These controls can however, not supersede the official controls, which must remain the responsibility of the competent authorities of Member States. FVE is in principle not against Member States competent authorities delegating such controls to accredited bodies. These bodies must however be independent and offer the same level of expertise and guarantee that the competent authorities.

Implementation of Quality Assurance Programmes

FVE would support such a move as it can only contribute to improve food safety and provide consumers with greater transparency and guarantees.

Availability of new inspection techniques

FVE has no objection with the introduction of new inspection techniques provided they would have been validated.

Regionalisation of inspection

FVE can accept the concept of regionalisation of inspection. It is true that from a scientific point of view, inspection will differ from one area of the European Community to another to take into account the health status of these areas. This approach might however introduce a degree of complexity, which could practically prove difficult to manage. Disease patterns may evolve and animals presented to a slaughterhouse may come from regions with different health status. On the other hand, as stated before, the post-mortem inspection should be based on the information accompanying the animals and in particular on the health status of the farm of origin, to concentrate on the highest risk factors and ensure an optimal use of the resources.

Inspection techniques to include also animal health and welfare needs

FVE regards this as essential as, already stated public health, animal health and animal welfare are interrelated. However, information flow is also essential and needs to be integrated in the proposed approach.

Role of HACCP and transfer of responsibilities

FVE considers that the role of the competent authorities is threefold:

To fix the health objectives to be attained and to ensure that food operators have put in place the measures to obey the given objective and whether the practical implementation of these measures will result in the attainment of the objective, as stated in the Commission paper.

However, as already stated above, the role of the competent authorities is also one of guaranteeing food safety and public health. This is a public duty, which can not be underestimated if consumer confidence is to be restored. At a time when the image of food has been severely damaged, it would be wrong to move in a direction, which could be perceived as deregulation in the eyes of the consumer, and which in the opinion of the FVE does not provide the highest level of consumer safety.

Furthermore, as the proposed meat inspection system should also include animal health and welfare elements, it is feared that this information would be lost if the inspection was to be carried out by the food-operators themselves. These would indeed have a tendency to concentrate their inspection on public health parameters; losing track of findings, which may be important from an animal health or welfare viewpoint (e.g. broken legs).