



**THE DEVELOPMENT OF A RISK BASED MEAT INSPECTION  
SYSTEM  
SANCO / 4403 / 2000**

**FVE COMMENTS**

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FVE welcomes the Commission efforts to improve the existing meat inspection procedures, which need to be modernised, and the opportunity to comment on this important working document.

**General comments**

- 1) FVE agrees that the information flow between farms and other food operators further down the chain is essential. There is however a need for a two-way communication system.
- 2) FVE believes that there must be a clear distinction between the responsibilities of the different actors: HACCP-procedures have to be developed and implemented by the food operators, competent authorities must audit these HACCP-procedures and official veterinarians appointed by the competent authorities and independent from the food operators must carry out the ante- and post-mortem inspection.
- 3) FVE considers that the paper put much emphasis on microbiological hazards and too little on other hazards such as residues of veterinary medicinal products, residues of pesticides, environment contaminants, parasites, TSEs...
- 4) FVE is concerned that the proposal to let inspectors replace official veterinarians in small and medium size slaughterhouses is a step backward for consumer protection; the recent FMD outbreak demonstrates the importance of the *ante-mortem* inspection and who else but a veterinarian can diagnose animal disease. Furthermore, risk are as high in small and medium size slaughterhouses as in large ones and there is no reason why control should be less stringent or performed by less qualified personnel in such slaughterhouses.
- 5) FVE considers that the merit of a visual *post-mortem* inspection must be discussed on a species by species basis. In any case, without proper link between the veterinary practitioner attending the animals on the farm and the official veterinarian doing the ante- and post-mortem inspections, a visual *post-mortem* inspection is unimaginable. Lastly, what is possible for a species like broiler chickens, which are often produced under controlled and standardised conditions, will not be applicable to other species, and to cattle in particular, which are raised under much varying conditions.
- 6) Finally, FVE is strongly concerned that reduction of inspection costs rather than consumer protection underpins some of the ideas put forward in this paper.

**President**

Dr K. Simon

**Vice-Presidents**

Dr O. Bro-Jorgensen

Dr C. Mir

Dr A. W Udo

Dr R. Zilli

## **Detailed comments**

### **1. Summary, second dash**

Instead of microbiological hazards, it might be better to refer to human health related hazards, which would also include other hazards such as residues of veterinary medicinal products, residues of pesticides, environment contaminants, parasites, TSEs...

### **3.1 General observations**

A system for hazard identification and characterisation must definitively be in place before a risk-based meat inspection can be implemented. Would that be a task for the European Food Authority?

It is welcomed that intensively monitoring is considered as a pre-requisite to the implementation of a risk-based meat inspection. However, it is not sufficient to monitor known and identified hazards. Monitoring should therefore also include the monitoring of emerging hazards or risks.

### **3.2 Organisation of monitoring**

Toxoplasmosis shall be added to the list of hazards to be monitored.

### **3.3 Management measures**

As hazard exposure may vary considerably between Member States, so will the risk. There should consequently be room for flexibility in the choice of risk management procedures.

### **4.3 Procedure for setting specific FSRs**

If FSRs are to be expressed in terms of quantity/concentration/number of hazards present in a certain quantity of food, it is difficult to see how FSRs for the same identified hazard would have to vary between Member States.

### **4.4 Microbiological FSRs**

Hygiene guidelines and guidelines for pathogenic bacteria are important tools as well as zero tolerance of visible faecal contamination and absence of patho-physiological changes.

The list of pathogenic bacteria and their limit of tolerance must be established in consultation with the Scientific Committees on Veterinary Measures relating to Public Health.

#### **4.4.3 Zero-tolerance of visible faecal contamination**

It is impossible in practice to trim poultry carcasses.

#### **4.5 Patho-physiological changes**

The absence of patho-physiological changes must be a mandatory requirement.

## **5. Verification of the HACCP procedures and meat inspection**

FVE supports the introduction of HACCP-procedures in slaughterhouses. It is however important to clarify that food operators have the primary responsibility for food safety and have to implement HACCP-procedures. The role of the competent authority should be to audit these procedures and not to approve the procedures in the place.

## **6. Information from the farm**

FVE fully supports the view that information on animal health, animal welfare and veterinary public health must be collected at farm level and must then accompany the animals to the slaughterhouse. The information flow must however work both ways so that the official veterinarian can also report back to the farm and to the practicing veterinary surgeon attending the animals on the farm findings of the *ante-* or *post-mortem* inspection.

## **7. Ante-Mortem Inspection**

FVE fully supports the view that the *ante mortem* inspection must remain an essential element of meat inspection and that it must be performed by a veterinarian. FVE also agrees that the information collected at farm level by the private practitioner attending the animals can add valuable information to the official veterinarian performing the *ante mortem* inspection at the slaughterhouse. This requires however the development of efficient communication tools, which should work both ways so that findings can be reported back from the slaughterhouse to the farm.

The concept of clean animals must be defined more precisely and it might be useful to consult the Scientific Committee on Veterinary Measures relating to Public Health on this issue.

## **8. Post-Mortem Inspection**

FVE cannot support a generalization of visual post-mortem inspection. Decisions must be made on a species by species basis and what might be feasible for broiler chickens or fattening pigs may well not be applicable to other species.

Furthermore, it is important to point out that a pre-requisite to the implementation of visual post-mortem inspection for broiler chickens or fattening pigs, should be the existence of health herd surveillance programmes, involving routine visits by veterinary surgeons, at farm level.

### **9.1 Ante- and post- mortem inspection in relation to HACCP**

FVE does agree that certain elements of the *ante-* and *post-mortem* inspection could be integrated into the HACCP-system.

FVE has however very strong concerns on the proposed approach. At a time where consumer confidence in food safety has been seriously undermined, any attempt to transfer responsibilities from public authorities to food operators must be carefully considered.

Therefore, should some elements of the *ante-* and *post-mortem* inspections be integrated into the HACCP-system, and it can only be some of them, the remaining elements of the *ante-* and *post-mortem* inspection must be carried out by an official veterinarian independent from the inspected slaughterhouse operator.

In addition, the competent authority has a clear responsibility to audit the HACCP-system put in place by the food operators. As this document makes reference to the Commission proposals on the recast of the hygiene legislation, it is worth pointing out that these

proposals places the responsibility on the food operators to achieve the required level of hygiene and safety. The European legislator is thus less prescriptive than in the past and leaves more room for manoeuvre to the individual operators. The counterpart is that competent authorities have the power and the duty to ensure that operators have in place adequate procedures to achieve the required level of hygiene and safety.

FVE therefore considers that the duties of the competent authority is to audit the HACCP-system put in place by the food operators and to ensure that both the *ante-* and *post-mortem* inspections are carried out by an official veterinarian independent from the inspected slaughterhouse operator.

The argument of avoidance of work duplication between the activities carried out by the company staff and the work carried out by the competent authority is an appealing one. FVE is however concerned that this argument is in fact masking the true reality, which is that some of these proposed changes are primarily aimed at reducing the inspection costs borne by the food industry.

FVE cannot support any proposal aimed at reducing costs for the food industry when the advantage for the consumer and for consumer protection in particular are far from being evident.

It is also difficult to believe that the proposal to let a veterinarian accredited by the competent authority but employed by the inspected slaughterhouse operator to carry out official duties such as the *ante-* and *post-mortem* inspection represents a progress in consumer protection. This proposal is furthermore in evident contradiction with international norms such as the EN 45000 series on inspection, which insist on the independence, impartiality and integrity of inspectors.

This proposal is not realistic and all official veterinarians involved in meat inspection duties can testify how much pressure from the part of the meat industry they sometime have to cope with, when they have to declare carcasses unfit for human consumption. How could official veterinarians keep tomorrow their independence if difficult decisions, such as declaring meat unfit for human consumption, could result in a termination of contract?

Lastly, FVE strongly believe that true progress in consumer protection can be achieved in establishing efficient communication between the veterinarian responsible of the animals at farm level and the official veterinarian at the slaughterhouse. A greater emphasis should therefore be placed on the veterinary presence at farm level and the need for routine visits, and on modern and efficient communication tools between farms and slaughterhouses.

### **10.1 Professional qualifications of veterinarians**

FVE is not opposed to the proposal to describe in the legislation the professional qualifications to be required from veterinarians working in an HACCP-environment and in risk-based inspection system. It must however be borne in mind that the demands on the profession are now changing and increasing rapidly and that, at the same time, amending European legislation is a lengthy process. As an example, the Directive establishing the minimum training requirements of veterinary surgeons was adopted in 1978 and has never been amended since despite numerous requests from the profession.

### **10.3 Professional qualifications of qualified meat inspectors**

This must be read with the Commission proposals on the recast of the hygiene legislation, where it is proposed that in small and medium sized slaughterhouses, inspectors could replace official veterinarians. FVE has commented separately on this proposal and

expressed its concerns at seeing a new category of professionals being allowed to perform *ante-* and *post- mortem* inspections. FVE was even more surprised that inspectors qualifications were not mentioned elsewhere in the Commission proposals

Again, FVE cannot believe that the proposal to replace official veterinarians by less qualified personnel to perform *ante-* and *post-mortem* inspections in slaughterhouses represent a progress in consumer protection.

Furthermore, it must be pointed out that the problems encountered in small slaughterhouses are in general greater and more varied than in large slaughterhouses.

### **11.1 Conclusions – zoonoses**

FVE supports the approach. However, this must be enlarged to include other hazards such as residues of veterinary medicinal products, residues of pesticides, environment contaminants, parasites, TSEs...

### **11.2 Conclusions - hygiene**

FVE supports wholeheartedly the concept of the information flow. It must however be two-way from the farm to the slaughterhouse and from the slaughterhouse to the farm, so that the official veterinarian can report back findings of the *ante-* or *post-mortem* inspection to the farm and to the practicing veterinarian attending the animal on the farm.

### **11.3 Conclusions – official controls**

FVE cannot support the proposal to transfer meat inspection activities from competent authorities to slaughterhouses operators.