



Brussels, 09 March 2007  
FVE/07/doc/019

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Mr. Eric Poudelet  
Directorate General SANCO  
Hygiene and Control measures  
Head of Unit  
B-1049 Brussels

**Subject: Review of hygiene Regulations EC 852/2004, EC 853/2004 and EC 854/2004**

Dear Mr. Poudelet,

following the consultation of stakeholders regarding the review of the three hygiene Regulations EC 852/2004, 853/2004 and 854/2004, the Federation of Veterinarians of Europe is hereby reflecting on the experience gained so far from the implementation of these Regulations.

FVE acknowledges the effort of a simplification process of the food hygiene Regulations, even so simplification has turned out to be quite complex. An official consolidated version of the Regulations could be helpful, which also should provide the ground for a certain minimum level of consumer protection in each member state.

Many transitional periods are foreseen in the three food hygiene Regulations (852/2004, 853/2004 and 854/2004) and some are still ongoing for different items and actions. Therefore it is too early to reflect and comment on every part of the Regulations.

The FVE understands that the Commission wants to start the review as early as possible in order to collect the information's and take the necessary steps, but we would like to stress that it is also important for us to gather more experience for instance with the Food Chain Information and that we would like to come back to you again at a later point with more comments on items that are not fully implemented at this point. It will take some more time to be able to oversee what effects the new legislation will have on the hygiene standards in Europe.

FVE sees a problem in an extension of the requirements of Article 5 (EC) 852/2004 (*Hazard Analysis and Critical Control Points* [HACCP] principles) to food business

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operators carrying out primary production. Due to lack of resources and abilities in many primary production facilities it is not clear how HACCP could be implemented in such places. Therefore we would recommend using guidelines for food safety in primary productions. The basic principles of HACCP could be applied for these guidelines.

From contact with our members it became clear that there is a need for clarification of the term "Audit". HACCP as defined by ISO-standards or Codex is difficult to apply to small businesses and primary productions such as farms (as mentioned earlier). But for being able to do an audit on the system, a standard is needed that one can audit against. Therefore the FVE recommends a clarification of the term "Audit", which should include a broader definition to make it applicable to primary productions.

To improve the traceability of meat and meat products FVE sees a need for "commercial documents" for the movement of food of animal origin, not only for animal by-products as it is now.

At this point in time we cannot comment on the Food Chain Information (FCI) as it is not yet fully implemented, but we now already wish to stress that in our view it is crucial that the system will be credible. An essential part in realising this credibility will be achieved by making sure that private veterinary practitioners will be strongly involved into herd health schemes on farms with a clear mandate (audit/inspection/consult). Thanks to their broad education and their every day experience, the veterinary profession is best placed to give a holistic approach to animal health, animal welfare and public health. Veterinarians are able to give the value to the FCI that is necessary in order to ensure consumer safety. This immediately leads to the last point we would like to make, which is that regardless the size of an slaughter/processing establishment veterinarians should not be replaced by assistants or auxiliary personnel. In small establishments, as well as in larger establishments, the crucial role in food safety and consumer protection must be carried out by a veterinarian.

We thank you for your time and consideration and ask you not to hesitate to contact us in case further information would be required. We will be happy to answer your questions.

Yours sincerely,

Jan Vaarten  
Executive Director

<p><b>FVE</b> is the umbrella body for veterinary organizations from 37 European countries, including all EU and EFTA countries and most of the Eastern and Central European countries. FVE represents approximately 200.000 veterinarians throughout Europe.</p>
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