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Subject: SANCO/2696/2006 amending Commission Regulation (EC) No 2074/2005 as regards implementing measures for certain products of animal origin intended for human consumption and laying down specific rules on official controls for the inspection of meat

The Federation of Veterinarians of Europe (FVE) would like to comment on the Commission Regulation Draft SANCO/2696/2006 Rev.5. We strongly recommend redrafting of the newly inserted Annex VI b of this Regulation.

In Part 2 of Annex VI b the post mortem inspection in establishments with discontinuous slaughter or processing activities is newly regulated by way of derogation to point (1) of Annex I, Section III, Chapter II to Regulation (EC) No 854/2004. The official veterinarian need not be present at all times during *post-mortem* inspection in cases where an official auxiliary performs the *post-mortem* inspection and the official veterinarian will visit the establishment at least once a day when slaughter activities take place or have taken place. The competent authority can also decide, based on a risk analysis, that meat with certain minor abnormalities does not need to await inspection by the official veterinarian.

FVE is not content with the definition of "discontinuous slaughtering" and the Annex does not meet the intention of Regulation (EC) 854/2004 for visual inspections. We consider that "discontinuous slaughter" does not fulfil the intention of the derogation regarding "small, local and remote" areas and that the proposed risk analysis does not provide sufficient reassurance that standards will be maintained in all cases where it is proposed that the official veterinarian does not need to be present at all times during slaughter activities.

While FVE understands the Commission's reluctance to define the terms 'small, local and remote' we are far from convinced that the mechanism of 'discontinuous

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slaughter' can be used to ensure that the required level of reassurance of food safety is maintained.

FVE accepts the role of the Official Auxiliary, but emphasises the importance of maintaining the current controls of veterinary supervision.

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

FVE 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.