Role of the Private Veterinary Practitioner in Food Hygiene Controls on Farm

The role of the private veterinary practitioner is referred to throughout the EU food hygiene legislation implemented on the 1st January 2006, but it is imperative that the opportunity to participate in this work is grasped by the profession.

Veterinarians must lobby for inclusion in the multi-annual plan of official controls which each member state is required to prepare under the requirements of Articles 41, 42 & 43 of Regulation (EC) No 822/2004.

Definitions
The legislation considers there to be three types of veterinarian, defined according to their training.

Official Veterinarian: means a veterinarian qualifies, in accordance with Regulation 854/2004, to act in such a capacity and appointed by the competent authority

Approved veterinarian: means a veterinarian designated by the competent authority to carry out specific controls on holdings on its behalf

Veterinarian means a qualified veterinarian.

Assistance to the farmer as a food business operator (FBO)

Legislation
Regulation (EC) No 852/2004 Annex I

2. As far as possible, food business operators are to ensure that primary products are protected against contamination, having regard to any processing that primary products will subsequently undergo.

3. Notwithstanding the general duty laid down in paragraph 2, food business operators are to comply with appropriate Community and national legislative provisions relating to the control of hazards in primary production and associated operations, including:

   (a) measures to control contamination arising from the air, soil, water, feed, fertilisers, veterinary medicinal products, plant protection products and biocides and the storage, handling and disposal of waste; and
   (b) measures relating to animal health and welfare and plant health that have implications for human health, including programmes for the monitoring and control of zoonoses and zoonotic agents.

4. Food business operators rearing, harvesting or hunting animals or producing primary products of animal origin are to take adequate measures, as appropriate:

   (h) to prevent the introduction and spread of contagious diseases transmissible to humans through food, including by taking precautionary measures when introducing new animals and reporting suspected outbreaks of such diseases to the competent authority;
   (i) to take account of the results of any relevant analyses carried out on samples taken from animals or other samples that have importance to human health; and
   (j) to use feed additives and veterinary medicinal products correctly, as required by the relevant legislation.
8. Food business operators rearing animals or producing primary products of animal origin are, in particular, to keep records on:

(b) veterinary medicinal products or other treatments administered to the animals, dates of administration and withdrawal periods;
(c) the occurrence of diseases that may affect the safety of products of animal origin;
(d) the results of any analyses carried out on samples taken from animals or other samples taken for diagnostic purposes, that have importance for human health; and
(e) any relevant reports on checks carried out on animals or products of animal origin.

10. The food business operators may be assisted by other persons, such as veterinarians, agronomists and farm technicians, with the keeping of records.

Lays out the detail of the Food Chain Information to be provided by the Food Business Operator of the holding of provenance. This includes at 3(h) the name and address of the private veterinarian normally attending the holding of provenance.

Role for private veterinary practitioner
The farmer’s responsibility to ensure that his product is uncontaminated by herbicides pesticides, and veterinary medicinal products, and to ensure that risks associated with animal health, animal welfare or zoonotic disease are controlled can only be effectively achieved through a specifically designed animal health plan.

These plans must be drawn up in conjunction with the producer’s veterinarian who can provide reassurance to customers and consumers.

From January 2008 for pigs, January 2009 for horses and veal calves and January 2010 for cattle and sheep, Food Chain Information (FCI) will have to required to be provided by the producer for every consignment of animals sent for slaughter. The legislation specifically requires there the name of the private veterinarian who normally attends the holding of provenance to be provided. This should be the name of the veterinarian who has been involved in the development and audit of the animal health plan for the holding.

To carry out this task veterinarians may require specific training as to the standards required and the correct completion of legally required documentation and records.

Ante-mortem on farm
Legislation
However, the competent authority may adapt this approach in certain slaughterhouses and game handling establishments identified on the basis of a risk analysis and in accordance with criteria laid down in accordance with Article 18, point 3, if there are any. In such cases the official veterinarian need not be present at the time of ante-mortem inspection in the slaughterhouse if:
(i) an official veterinarian or an approved veterinarian carried out ante-mortem inspection at the holding of provenance, checking the food chain information and communicated the results of the checks to the official auxiliary at the slaughterhouse,
(ii) the official auxiliary at the slaughterhouse is satisfied that the food chain information does not point to any possible problem for food safety and that the animal's general state of health and welfare is satisfactory
And
(iii) the official veterinarian regularly satisfies himself/herself that the official auxiliary is carrying out such checks properly.

Makes it clear that the information is to be provided in the form of a certificate signed by the veterinarian who has examined the animals.

Regulation (EC) No 854/2004, Annex I, Section IV, Chapter IV & V
Allows ante-mortem at the holding of provenance to be carried out by an official veterinarian or an approved veterinarian for pigs and poultry.

Regulation (EC) No 854/2004, Annex I, Section IV, Chapter VII, A
Allows ante-mortem at the holding of provenance for farmed game.

Role for private veterinary practitioner
The legislation allows ante-mortem for pigs and poultry, under certain circumstances, to be carried out by an approved veterinarian, who is a private veterinary practitioner who has undergone a course of training. (see annex A).

This concession also extends to farmed game.

Animals slaughtered at the holding of provenance
Legislation
Domestic ungulates that have undergone emergency slaughter outside the slaughterhouse may be used for human consumption if a veterinarian has carried out an ante-mortem inspection of the animal.

A declaration issued by the veterinarian recording the favourable outcome of the ante-mortem inspection, the date and time of and reason for, emergency slaughter, and the nature of any treatment administered by the veterinarian to the animal, must accompany the slaughtered animal to the slaughterhouse.

Para 1. Slaughter of poultry on farm can occur if the farm undergoes regular veterinary inspection.
Para 7 The slaughtered animal must be accompanied to the slaughterhouse by a certificate issued by the official veterinarian or approved veterinarian in accordance with Reg (EC) No 854/2004

The Food Business Operator may slaughter farmed ratites, farmed ungulates and bison in exceptional circumstances at the place of origin with authorisation from the competent authority if
Para 3(b) the farmed game herd undergoes regular veterinary inspection
Para 3(j) during transport to the approved establishment, a certificate issued and signed by the official veterinarian or approved veterinarian, attesting to a favourable result of ante-mortem inspection, correct slaughter and bleeding and the date and time of slaughter, accompanies the slaughtered animals.

Role for private veterinary practitioner
There are several circumstances where animals may be slaughtered on farm and the bled carcase conveyed to a slaughterhouse for dressing. The most common of these is the emergency slaughter animal, where following ante mortem inspection by a veterinarian the animal is slaughtered and accompanied by a certificate transported to a slaughterhouse.

Other less frequent opportunities exist for the slaughter of poultry, especially ducks and geese, ratites and large farmed game.
Analysis of post-mortem information
Legislation
Regulation (EC) No 854/2004, Annex I, Section II, Chapter I, para 2(a & b)
(a) If the inspections reveal the presence of any disease or condition that might affect public or animal health, or compromise animal welfare, the official veterinarian is to inform the food business operator.

(b) Where the problem identified arose during primary production, the official veterinarian is to inform the veterinarian attending the holding of provenance, the food business operator responsible for the holding of provenance (provided that such information would not prejudice subsequent legal proceedings) and, where appropriate, the competent authority responsible for supervising the holding of provenance or the hunting area.

Role for private veterinary practitioner
An important role for the private veterinary practitioner, linked to the provision of an animal health plan is the requirement for the official veterinarian at the slaughterhouse to inform the veterinarian responsible for the holding of provenance of ante-mortem and post-mortem findings. This data requires interpretation and analysis, a task for which the private veterinarian is ideally suited.

Meat Inspection in local abattoirs
Legislation
Regulation (EC) No 854/2004, on the official controls does not describe an inspection role for a veterinarian within a slaughter establishment other than that of a full Official Veterinarian who has completed the full programme of training. However, this is an oversight which FVE should ask the Commission to address.

Role for private veterinary practitioner
In many countries throughout the EU, veterinarians carry out inspection duties on line. This role must be maintained, especially in remote areas where the income from inspection duties helps to support the viability of private veterinary practice.

Raw milk and dairy products
Legislation
Animals on milk production holdings must be subject to official controls to verify that the health requirements for raw milk production, and in particular the health status of the animals and the use of veterinary medicinal products are being complied with.

These controls may take place at the occasion of veterinary checks carried out pursuant to Community provisions on animal or public health or animal welfare and may be carried out by an approved veterinarian.

Lays out the health requirements for raw milk production

Role for private veterinary practitioner
While further clarification of exactly what checks are expected and how the controls should be carried out there is a role in dairy production for veterinary involvement. This may be another area where private veterinary practitioner input to an animal health plan is essential.
Summary
The legislation gives the private veterinarian a key role in the assisting of the food business operator, the farmer, in the production of safe food and in the maintenance of records to provide evidence of the controls in place.

This role can best be implemented through the production and implementation of farm specific animal health plans. These plans need to be reviewed on a regular basis. It is essential that information provided to the private veterinarian in the form of ante-mortem and post-mortem findings, is interpreted correctly and utilised to inform these reviews.

For each role the private practitioner requires specific training and expertise to ensure that the profession can demonstrate its ability to add real value.

FVE should lobby national competent authorities for the inclusion of the role of the private veterinary practitioner in the multi-annual national control plan.

RJH