



FEDERATION OF VETERINARIANS OF EUROPE

Brussels, 13 April 2007
FVE/07/corr/019

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Mr. Ronald Dwinger
Directorate General SANCO
Animal Health and Standing Committees
B-1049 Brussels

Subject: SANCO/2696/2006 amending Commission Regulation (EC) No 2074/2005

Dear Mr. Dwinger,

first of all FVE would like to thank you for the opportunity to comment on the subject of discontinuous slaughter.

FVE carefully considered the redrafting of Annex VI b, and we contacted our members in order to provide an alternative text to the Commission.

In small craft style butcher shops we can accept the practice that Official Veterinarians can carry out ante-mortem inspection in the morning and come back later for the post-mortem inspections. However, our main concern is that this derogation will be extended to middle sized establishments and that some Member States may allow the Official Veterinarians to do the ante-mortem inspection in the morning, and then come back later to do the post-mortem inspection on material which the official auxiliaries have left aside. FVE considers that this approach runs contrary to the wishes and intention of the Parliament, laid down in Regulation (EC) 854/2004, Annex I, section III, chapter II, para 2.

There is also significant concern that the risk analysis mentioned in Annex VIb, para 2a) (i) does not provide sufficient reassurance that hygiene 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. What detail of the risk analysis is provided in para 2(b) does not provide reassurance that the interpretation of the process might not vary greatly in different member states.

One major concern arising from this proposal is that the re-occurrence of disease, including serious epizootic diseases, could be missed, or their detection delayed, because minor abnormalities don't need to be shown to the official veterinarian any more. This is of concern especially in small slaughter facilities where the animals presented for slaughter can be of varying quality, much more than this is the case in bigger facilities. FVE suggests that this exemption is only applied to specifically

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defined lesions such as common chronic lesions or other non-acute localised lesions. Examples for those kinds of lesions are: scars, localised abscesses, liver fluke damage.

In conclusion FVE has tried to come up with an alternative text, but we cannot find a definition of discontinuous slaughter which defines the establishments in which we would consider it appropriate to derogate from the requirement for continuous Official Veterinarian presence during the post-mortem inspection.

The conditions are different in every slaughter facility and the quality of slaughter material can vary from day to day. Therefore FVE can not support the mechanism of discontinuous slaughter as a way of derogation of the presence of the Official Veterinarians in its current form. As a suggestion, some qualitative measure could be introduced into the risk analysis but we do recognise the difficulties this approach poses.

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.