



## FVE Position Paper

### Modernising Inspections in Slaughterhouses

In July 2008 the French Presidency held a seminar in Lyon on modernising inspections in slaughterhouses. The Federation of Veterinarians of Europe (FVE) became aware of the recommendations from this seminar, which had subsequently been discussed by the Chief Veterinary Officers during their informal meeting in Strasbourg in October 2008.

FVE would like to comment on certain aspects of the recommendations and, in addition, give suggestions for areas in the food chain where a change (modernisation) would be welcomed. However, we feel strongly that there are changes being discussed that could lead to a decrease in the current level in food safety. The aim of modernisation must be to increase the efficiency of the controls for food safety and not only cost reduction.

#### **1 Meat hygiene has to focus on animal health, animal welfare and public health equally.**

*Explanation: It is important to understand that animal welfare cannot be separated from animal health and therefore also public health. Only a holistic approach can guarantee safe food. We strongly feel that a 'welfare officer' who is not a veterinarian is not able to have this holistic view and assess animal welfare also with respect to the animal health consequences.*

#### **2 Controls should be based on peer reviewed science and should be risk based.**

*Explanation: FVE does not insist on sticking to traditional rules as long as modernised approaches are scientifically underlined and risk based. Modernisation should not be driven by cost-reduction*

#### **3 A varied level of official controls should be possible based on risk analysis. Flexibility in the controls, inspections and audits should be applicable depending on factors such as the level of self checks (FBO), the situation in a MS, the overall level of animal health, animal welfare and public health risks.**

*Explanation: The European hygiene package leaves room for 'flexibility' in many areas of food hygiene. We agree with this concept, especially since for certain types or sizes of food businesses flexibility is necessary for their continued operation.*

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**4 There are differences in the ability of FBO's to take full responsibility for food hygiene. This needs to be acknowledged and we need to react to this.**

*Explanation: The competence of the FBO is the single most important risk factor in the ability of a business to produce safe food. The same business process can be perfectly safe, and require minimum intervention with responsible competent management, but can also be high risk and thus require constant input from the enforcement authority if food safety management is poor.*

**5 The consumer expects an independent body to ensure food safety.**

*Explanation: We fully agree with the concept that the FBOs are the responsible persons for food safety and therefore are also responsible for their own checks. But in case that these checks fail (e.g. outbreaks of notifiable diseases, food borne disease outbreaks) a system should be in place, which makes the FBO liable.*

*In addition to that, we fully agree that the FBO can take over some of the inspection procedures, but these procedures have to be audited by an official control. The FBO has to prove that the quality of inspections is maintained through a quality assurance programme. The primary role of the veterinarian in public health is inspection, audit and enforcement where necessary, of the checks performed by the FBO, and is thereby fulfilling the consumer's demand for an independent body to ensure food safety.*

**6 Key roles of the veterinarian in public health are inspection, audit and enforcement.**

*Explanation: Most of the pathogens that are of importance in meat and meat products in Europe today cannot be detected by gross examination of the carcass. The risks in food hygiene change gradually over time, therefore the inspection regime has to be adjusted accordingly, but again based on peer reviewed science and risk analysis.*

**7 Veterinarians must have the education and the necessary resources to enable them to fulfil their tasks.**

*Explanation: In the food chain the veterinarian is the link from farm to the consumer. More specifically the veterinarian is also the link between primary production and the slaughter facility and also back to the primary production, in cases where abnormalities were found during the checks and/or laboratory tests. For this the education (including continuous professional development) of veterinarians working in food hygiene is of importance. In addition the competent authority must provide the necessary resources to the veterinarians so they can fulfil their tasks.*

**8 FVE considers ante-mortem inspection performed by a veterinarian to be essential. However, under certain controlled circumstances, it may be appropriate to vary the ante-mortem inspection procedures for individual animals.**

*Explanation: Ante-mortem inspection could (in certain cases) be performed on a unit-by-unit basis, where a unit may be a group of animals or an individual animal. The decision as to whether ante-mortem inspection should be applied to an individual or group of animals lies with the official veterinarian.*

**9 It is recommended that the Food Chain Information is linked to a herd health plan.**

*The Food Chain Information is not only essential for the meat inspection in the slaughterhouse but can also be an important tool for the farmer and practitioner to improve animal health, animal welfare and food safety at the primary production.*

**10 FVE is concerned about the developments in some Member States where veterinarian and therefore their expertise are more and more removed from the slaughter facilities in order to save costs.**

*Explanation: With developing the EU Community Animal Health Strategy (2007-2013) the European Commission clearly emphasises the high value of prevention and early detection in animal health, which can only be achieved by collaboration of all involved actors. Especially pillar three ('prevention and controls') of the strategy recognises the importance of veterinary expertise, veterinary controls and veterinary certificates with regards to prevention and crisis management. Only an exact diagnosis and scientific analysis of examination results can lead to early detection and prevention of often devastating epi- and/or pandemics. This was also emphasised by Commissioner Androulla Vassiliou during the opening of the 'veterinary week' in the end of last year where she highlighted the important role of the veterinarian as one of the crucial players in consumer protection. Therefore by removing veterinarians from the slaughter facilities one of the main aims of the Community Animal Health Strategy will be undermined.*

**FVE** is the umbrella body for veterinary organizations from 38 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.