



FVE position on food safety rules for checks on meat & shellfish Delegated & Implementing Acts

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In the EU serious efforts are made to assure the safety and quality of the food.

The EU food chain is subject to a comprehensive set of rules that protect the health of consumers, the health and welfare of animals and the environment.

Veterinarians with their recognised and extensive knowledge and expertise in the fields of animal health/welfare and public health play a crucial role in controlling and defending the safety and quality of food. Official veterinarians represent a public good particularly on farm and in the slaughterhouse environment as they bring an added value to the whole society.

The Federation of Veterinarians of Europe (FVE) welcomes the recent draft acts¹ launched for public consultation. However, FVE is concerned that this revision of the legislation will be misused as an opportunity to save money rather than to strengthen the quality of the food chain. Such approach creates unnecessary risks for food safety, public health, animal health and welfare. The ongoing competition based on low pricing of food of animal origin is of detrimental effect on the way animals are kept and treated², decreases consumers awareness about the high value of food of animal origin and increases food waste.

In light of the several animal disease outbreaks in Europe (e.g. African swine fever, tuberculosis), food frauds (e.g. illegally treated animals) and the frequent occurrence of food or feed risks (e.g. *campylobacter*, *salmonella*), FVE calls upon the EU Institutions to not reduce the consumer protection and the animal welfare, but to consider the high importance of the value of the veterinarian in the official controls for the European society. FVE wants to highlight the following:

- 1. National governments shall put in place all necessary resources to allow Competent Authorities and official veterinarians to fulfil their responsibilities (audit, inspection, enforcement);**
- 2. Official controls shall be done by adequate numbers of properly qualified and authorised official veterinarians;**
- 3. Since the inspection of live animals before slaughter is crucial for the detection and the prevention of spreading of contagious diseases these inspections shall always be carried out by qualified official veterinarians;**
- 4. Inspections carried out after the animal is slaughtered shall only be delegated to assisting staff when they are sufficiently trained and under the supervision of the official veterinarian.**

President

Rafael Laguens

Vice-Presidents

Zsolt Pinter
Arne Skjoldager
Andrew Robinson
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¹ [Food safety - rules for checks on meat & shellfish - Food safety - practical arrangements for checks on animal products](#)

² [Veterinarians' Contribution to the UN Sustainable Development Goals \(SDG\)](#)

In addition, FVE asks Member States and Members of the EU Parliament to carefully consider these suggestions:

DELEGATED ACT - rules for checks on meat & shellfish		
Articles	Alternative text	Justification
<p>Art. 3 par 1 letter (a) (ii)</p> <p>Criteria and conditions establishing when ante-mortem inspections in certain slaughterhouses may be performed by an official auxiliary</p>	<p>a (ii) the preselection of animals, <u>as for initial identification of those requiring Official Veterinarian attention</u>, showing possible abnormalities as regards human health, animal health and animal welfare requirements</p>	<p>To avoid confusion and misuse of other staff less trained from competent authorities, FVE suggests to explain “preselection” with a kind of a definition.</p>
<p>Art 3, par 2 and Letter (b)</p> <p>By way of derogation from Article 18(2)(a) of Regulation (EU) 2017/625, ante-mortem inspections may be performed on all species by an official auxiliary in a slaughterhouse under the responsibility of the official veterinarian, provided that the following criteria and conditions are met</p>	<p>By way of derogation from Article 18(2)(a) of Regulation (EU) 2017/625, ante-mortem inspections may be performed on all species by an official auxiliary in a slaughterhouse <u>under the supervision</u> of the official veterinarian, provided that the following criteria and conditions are met:</p>	<p>To replace responsibility with supervision. This means the official veterinarian is present in the premises.</p> <p>Even though ante mortem inspection is performed on farm by an official veterinarian, the transport from farm to slaughterhouse represents a critical phase.</p> <p>OIE standards provide that ante mortem inspection at the abattoir is an official veterinarian’s task. Early detection of diseases at the abattoir is crucial. Hence, the presence of the Official Veterinarian shall be required.</p>
<p>Art 9 - art 10</p> <p>Criteria and conditions for the performance of official controls including auditing activities in cutting plants</p>	<p><u>Other official controls</u> as referred to in Article 18(2)(d), including auditing activities, in cutting plants may also be performed by other staff designated by the competent authorities, by way of derogation from the requirements laid down in Article 18(2)(d) of Regulation (EU) 2017/625, provided that the competent authorities regularly check the work of such staff. Performance of these activities is subject to compliance with Chapter III of Annex II to this Regulation</p>	<p>To refer to the exact wording in Article 18 (2) (d) “<i>other official controls</i>” and NOT “<i>Official Controls</i>”.</p> <p>Cutting plants need audit from an independent official veterinarian.</p>
<p>Article 13 par 1 (b)</p> <p>Specific minimum requirements for the official veterinarian, the official auxiliary and the staff designated by the competent authorities</p>	<p>(b) veterinary students having successfully passed an exam on the subjects referred to in point 3 of Chapter I of Annex II and who are temporarily <u>performing a training</u> at a slaughterhouse in the presence of an official veterinarian.</p>	<p>FVE acknowledges that Annex V of the Directive on professional qualification recognition³ (laying down list of subjects – minimum curriculum and possibility to perform intramural/extramural training for vet students) shall be the reference.</p>

³ [Directive 2005/36/EC](#)

		Veterinary students are not qualified to perform a temporarily work at the slaughterhouse but can temporarily carry on training under the official veterinarian supervision.
IMPLEMENTING ACT - practical arrangements for checks on animal products		
Article	Alternative text	Justification
Article 7 Additional requirements for audits in establishments handling fresh meat	Official Veterinarian	To replace “Competent Authority” with “Official Veterinarian” since that certified exports require supervision and auditing by Official Veterinarians (letter (c) and (d)).

NOTES TO EDITORS

The Federation of Veterinarians of Europe (FVE) is an umbrella organisation of 44 veterinary organisations from 38 European countries, representing a total of around 240 000 veterinarians. The Federation of Veterinarians of Europe (FVE) strives to promote animal health, animal welfare and public health across Europe.

*For further information, consult the FVE website www.fve.org
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