

FVE comments on EU Commission Implementing/Delegated Regulations laying down uniform practical arrangements for the performance of official controls on products of animal origin intended for human consumption in accordance with Regulation (EU) 2017/625 (OCR)

The Federation of Veterinarians of Europe welcomes the recently revised Commission Delegated and Implementing Regulations drafts (versions of 15 June 2018) laying down uniform practical arrangements for the performance of official controls on products of animal origin intended for human consumption in accordance with Regulation (EU) 2017/625.

In particular FVE:

- recognizes the improvements made to find a compromise text with all parties involved;
- welcomes the strengthening of the Food Chain Information verification and the risk-based approach for post-mortem inspection, as detailed in Annex I of the Implementing Regulation (eg. Cisticercosis, the age limit revision regarding bovine post-mortem inspection based on specific tuberculosis status or disease surveillance in member states, practical arrangements for official controls for *Campylobacter*).

However, the FVE think that even if the official veterinarian is thoroughly mentioned in the texts in regards to the official control activity, the following points, mainly related to the derogation of specific tasks to auxiliaries/other staff of the competente authority, deserve further clarification:

Commission Delegated Regulation	
Recital/Article	FVE comment/suggestion
<p>(5) Ante-mortem inspections is essential for the protection of human health, animal health and animal welfare and therefore should remain the responsibility of the official veterinarian. However, certain routine tasks within ante-mortem inspection in slaughterhouses might be carried out by the official auxiliary without jeopardizing these objectives if certain criteria and conditions are complied with.</p>	<p>AM is defined in art. 17 OCR as such: <i>“ante-mortem inspection’ means the verification, prior to slaughtering activities, of human and animal health and animal welfare requirements, including, where appropriate, the clinical examination of each individual animal, and the verification of the food chain information as referred to in Section III of Annex II to Regulation (EC) No 853/2004;</i></p> <p>FVE has the feeling that derogations of AM tasks (routine tasks)in absence of the OV may conflict</p>



<p>(6) In particular, if an ante-mortem inspection has been carried out by the official veterinarian at the holding of provenance, more flexibility can should be given to the ante-mortem inspection at arrival in the slaughterhouse which might be carried out under the responsibility of the official veterinarian. However, when no ante-mortem inspection took place at the holding of provenance, the delegation of tasks should only be allowed if they are supervised by the official veterinarian, subject to certain criteria and conditions, and only for species other than poultry and lagomorphs.</p> <p>(8) It might be more efficient to evaluate human health, animal health and animal welfare requirements by carrying out ante-mortem inspections at the holding of provenance instead of in the slaughterhouse. Derogations from ante-mortem inspections in the slaughterhouse should therefore be allowed in all species, subject to certain criteria.</p>	<p>with such definition and may be interpreted differently by MSs. It is of paramount importance that OVs supervise OAs.</p> <p>It is provided that AM on farm is an option. FVE is of the opinion that it may bring added value only for large integrated livestock productions. However, it must be considered that too many critical steps are in between the farm and the abattoir (e.g transport, livestock assembling, abattoir arrival loading/unloading (hidden/neglected symptoms can be shown). e.g.. <i>Erysipelothrix</i> in swine. Do please consider this.</p> <p>EFSA Opinion on meat inspection AHAW panel https://www.efsa.europa.eu/en/press/news/130627-0</p> <p>FVE is of of the opinion that the OA does not have the medical knowledge to identify health problems and potential food safety hazards. Only the OV has the clinical competency to perform ante-mortem. This is in line with the definitions provided above and with the international standards (eg. OIE) .</p>
<p>Article 2</p> <p>(1) “Staff designated by the competent authority” means a person other than the official auxiliary and the official veterinarian, who is qualified in accordance with this Regulation to act in such a capacity in cutting plants and to whom the competent authority assigns the performance of specific actions</p>	<p>There are two typologies not mentioned in the text (co-located and stand-alone establishments) where OV supervision is required. The auditing activity in cutting plants shall be an OV remit.</p>
<p>Article 3</p> <p>Criteria and conditions establishing when ante-mortem inspections in certain slaughterhouses may be performed by an official auxiliary by way of derogation..</p>	<p>What is meant by certain slaughterhouses? Jurgeon may not be of help. FVE seeks for clarification.</p>



<p>(1) By way of derogation from Article 18(2)(a) of Regulation (EU) 2017/625, ante-mortem inspections may be performed by an official auxiliary in certain slaughterhouses under the supervision of the official veterinarian on species other than poultry and lagomorphs, provided that the following criteria and conditions are met:</p> <p>(a) the tasks within ante-mortem inspections are of a purely practical nature and only concern one or more of the following:</p> <p>i. verification that the food business operator complies with requirements related to food chain information and to the animal's identity check;</p> <p>ii. the preselection of animals showing possible abnormalities as regards human health, animal health and animal welfare requirements;</p>	<p>What is meant by pre-selection? A definition or an explanation will be certainly of help.</p>
<p>Article 7 Criteria and conditions for the performance of post-mortem inspections under the responsibility of the official veterinarian....</p> <p>Post-mortem inspections referred to in Article 18(2)(c) of Regulation (EU) 2017/625 may be performed by the official auxiliaries under the responsibility of the official veterinarian, subject to compliance with Chapter II of Annex II to this Regulation, when the following criteria and conditions are met:</p> <p>(2)(1) the slaughter or game-handling activities are carried out in a low-capacity slaughterhouse or game-handling establishment which slaughters or handles:</p> <p>(b)(a) less than 5 000 livestock units per year as defined in Article 2(b) of Regulation (EC) No 1166/2008 of the European Parliament and of the Council, taking into account the coefficients for different ungulates laid down in Annex I to Commission Regulation (EC) No 1200/2009; or</p>	<p>What is meant by low-capacity? Low capacity should be defined on a risk-based approach run by CAs or simply by the throughput?</p> <p>Higher risk is usually associated with performing PM by an OV in smaller slaughterhouse compared to larger slaughterhouses.</p>



<p>(c)(b) less than 300 000 poultry and lagomorphs per year; or (d)(c) a lower number than in (i) or (ii) if the competent authority so decides;</p> <p>(2) (3) the establishment concerned has sufficient facilities to store meat with abnormalities separately from other meat until the official veterinarian can inspect the meat with abnormalities himself;</p>	
<p>Article 9 Criteria and conditions for the performance of auditing activities and official controls in cutting plants, by way of derogation from the requirements laid down ...</p> <p>(1) The auditing activities referred to in Article 18(2)(d)(iii) of Regulation (EU) 2017/625 may be performed in slaughterhouses and game-handling establishments by official auxiliaries under the responsibility of the official veterinarian only as regards the collection of information on good hygiene practices and HACCP-based procedures, and subject to compliance with Chapter II of Annex II to this Regulation.</p> <p>(2) Official controls 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, 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>Auditing and inspections are purely OV tasks. Splitting auditing in several minor activities can generate confusion and different interpretations/distortions by CAs. FVE suggest to keep the auditing as an OV task; splitting the auditing into several activities conducted by different personnel, might generate confusion and misinterpretation by MSs as well as a potential abuse of the legal provisions.</p> <p>Does the other staff operate under the responsibility/supervision of the OV?</p> <p>It shall be clear that in case of certified exports OV audits are required and this could also raise concern among consumers who want independent official veterinarian</p>

Commission Implementing Regulation	
Recital/Article – Hot topic	FVE comment/suggestion
Article 7	On paragraph 1 and 3 FVE suggests to replace Competent authorities with



Federation
of Veterinarians
of Europe

<p>1. In addition to the requirements for audits laid down in Articles 3 and 4, the competent authorities shall....</p> <p>2.</p> <p>3. When carrying out audits of HACCP-based procedures, competent authorities shall check that due regard is given to the procedures set out in Section II of Annex II to Regulation (EC) No 853/2004 and that the food business operators' procedures guarantee, to the extent possible, that fresh meat:</p> <p>(a) does not contain pathological abnormalities or changes;</p> <p>(b) does not bear faecal or other contamination considered to pose an unacceptable public health risk;</p> <p>(c) complies with the microbiological criteria in Article 3 of Regulation (EC) No 2073/2005;</p> <p>(d) does not contain specified risk material, in accordance with the requirements in Regulation (EC) No 999/2001.</p>	<p>Official Veterinarian. This is line with what suggested before.</p> <p>FVE disagree. In case of certified exports OV audit is required. OV shall carry out the audit, especially for letters c) and d)</p>
--	---

NOTES TO THE 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 FVE Secretariat on Tel +32 2 533 70 20 or by e-mail to info@fve.org