

BEUC COMMENTS ON THE EUROPEAN COMMISSION'S QUESTIONNAIRE ON THE REVIEW OF MEAT INSPECTION

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3. Content of inspection

3.1 If additional hazards are identified by EFSA as a priority to be included in meat inspection, how should it be tested:

- *sampling/ testing by the food business operator (FBO), results available at establishment/ holding?*
- *sampling/ testing by the FBO, results to be communicated systematically to competent authorities?*
- *sampling/ testing by the competent authority?*
- *no additional sampling/ testing should be made mandatory?*

We consider that sampling/ testing should be mandatory if EFSA identifies additional hazards that need to be included. Given the fact that the meat sector and the meat industry has been involved in some of the most serious food safety scandals in the EU, we do not believe that sampling/testing should be left to them but rather that it should continue to be carried out by competent authorities. We also wish to point out the experience from New Zealand where such a trial to transfer competencies to slaughterhouse staff has had very worrying reports (and this still during the trial phase). We urge the EU to be very cautious when considering a move in this direction. Given the past scandals, consumers have very little trust in the meat sector and it is our belief that transferring responsibilities back to slaughter houses at this point in time will counteract all of the work done to date to rebuild confidence in this sector.

3.2 If additional hazards are identified by EFSA as a priority to be included in meat inspection should the health status of the group of animals for these animals be available before slaughter allowing possible hygiene measures at slaughter?

Yes.

3.2.1 For which additional hazards?

This should be based on EFSA's scientific advice.

3.3 If additional hazards are identified by EFSA as a priority to be included in meat inspection, should the test results be taken into account when declaring the meat fit for human consumption?

Yes.

3.3.1 For which additional hazards?

This should be based on EFSA's scientific advice.

3.4 Do you consider that visual inspection can be extended to more species?

We believe that this is not for stakeholders to decide but should be based on EFSA's scientific advice.

3.5 For which species do you consider that a differentiation of meat inspection based on the level of infection on a country/ region may be relevant?

As meat inspection plays an integral role in ensuring food safety and public health, we believe that this is not an issue which stakeholders should decide but rather any decision should be based on EFSA's advice.

3.6 Do you agree that meat inspection could differ from one Member State to another, based on EU harmonised epidemiological criteria?

It is difficult to answer this question in the absence of EFSA's opinions. In principle, however, we do believe meat inspections in a Member State should reflect the risks identified in that particular Member State. We must stress that this should not mean that other potential risks be ignored but rather a specific risk be highlighted. Our concern would be that this could create a very complicated situation in terms of enforceability of different approaches and it would need to be ensured that there were not differing levels of consumer protection across the EU. It would also need to be ensured that there was effective surveillance in place to identify new and emerging hazards, although this is necessary in any case.

3.7 Do you agree that a similar approach is used in third countries based on epidemiological criteria if considered equivalent?

We would be concerned about a plethora of differing approaches/ standards and how these, as well as any changes to the nature of the hazards of concern, could be monitored and effectively enforced. It would be very reliant on effective monitoring and surveillance systems which will vary considerably.

4. Organisation of inspection

4.1 Are you in favour of slaughterhouses of a differentiation based on a bonus/malus system, reflecting the outcome of audits, as regards?

- frequency of inspections;*
- responsibilities of slaughterhouse staff;*
- presence of official veterinarians;*

- other.

We are in favour of a risk-based approach, but consider that independent oversight is always necessary.

4.2 Are you in favour of flexibility on the presence of the official veterinarian when harmonised alert criteria are applied which require the intervention of the official veterinarian?

We would not be in favour of any flexibility regarding the presence of the official veterinarian. We believe that going down such a route could result in an increased risk of sick or infected animals being allowed into the food chain and would therefore oppose any move in this direction.

4.3 Are you in favour of flexibility on the permanent presence of the competent authorities when meat inspection is carried out by slaughterhouse staff and harmonised alert criteria are applied which require the intervention of competent authorities?

We consider that the permanent presence of competent authorities offers greater consumer protection as they bring an independent, public health focused perspective, regardless of conflicting pressures that may impact on the business.

4.4 Are you in favour of allowing ante-mortem inspection of all species to be carried out by the official or approved veterinarian at the holding of provenance?

No.

We believe that the control should be carried out in vivo in the slaughterhouse as the transportation process can result in illness in animals becoming more evident due to stress etc. It is also important that those animals which have died during transportation or which are identified as suffering a great deal should not be slaughtered for the food chain. Also, if inspections carried out prior to slaughter, this means that the animal can rest following transportation which is reflected in the quality of the meat.

4.5 Are you in favour of allowing ante-mortem inspection of all species to be carried out by the official or approved veterinarian at collection centres?

No.

4.6 Should the flexibility provided for as regards the presence of the official veterinarian during post-mortem inspection in an establishment carrying out discontinuous slaughter be extended to ante-mortem inspection?

No.

5. Distribution of responsibilities

5.1/5.2 *Should pilot projects related to the presence of the competent authorities in slaughterhouses?*

- *be limited to adaptations to Annex I?*
- *be extended to further adaptation in particular?*
- *decisions concerning fitness for human consumption and placing on the market may be taken by official auxiliaries if no deficiencies were found during the inspection?*
- *decisions concerning fitness for human consumption and placing on the market may be taken by the food business operator if no deficiencies were found during inspection?*
- *assistance of slaughterhouse staff in other species than poultry and lagomorphs similar to the conditions for these species?*

We would agree with further exploration of how official auxiliaries can be used most effectively (bullet point one) and how auxiliaries can assist, subject to supervision by the competent authority (bullet point three). Our main concern relates to the pilots looking at the potential to transfer responsibilities currently performed by independent inspectors to food business operators (bullet point two). We also have a more general concern about how pilots can reflect real life scenarios and pressures.

5.3 *What do you consider as the minimum tasks/ responsibilities of the official veterinarian concerning the verification of food chain information?*

The food chain information is key information and therefore needs to be assessed by someone who has sufficient training and qualifications in order to interpret it and any public health implications. We also think it is important that this is carried out by someone who has no vested interest. We consider that the official veterinarian should at least over-see auxiliaries who may carry out these tasks.

5.4 *What do you consider are the minimum tasks/ responsibilities of the official veterinarian concerning ante-mortem inspection?*

We consider that this should be initial checks, helped with practical tasks by slaughterhouse staff (option 4) as the ante-mortem inspection (as with the food chain information) is very important in order to ensure that any new animal health issues are identified.

5.5 *What do you consider as the minimum tasks/ responsibilities of the official veterinarian concerning post-mortem inspection?*

Our preference is option 2: by official auxiliaries who alert the official veterinarian if there is uncertainty/ possible non-compliance and regular checks each day of the work of the official auxiliaries by the official veterinarian.

5.6 What do you consider as the minimum tasks/ responsibilities of the official veterinarian concerning auditing tasks?

We consider that auditing is a task that can be shared by the official veterinarian and other competent authority staff.

5.7 For which species can specific tasks of meat inspection other than specific sampling and testing tasks be delegated to slaughterhouse staff?

We would need to see EFSA's opinion before answering this.

5.8 Do you consider the detection and removal of pathological abnormalities which are not a public health risk a task for the food business operator?

While we consider that such tasks could be carried out by auxiliaries or indeed plant staff, we believe that this should only be done under the supervision of the official vet. Our concern would be that if the official vet were not present, the food business operator would only eliminate affected parts and may neglect to remove potentially affected organs or other at risk parts of the carcass.

5.9 Should the following activities be included in a (future) definition of meat inspection?

5.9.1 Activities carried out in the slaughterhouse or food processing plant by competent authorities or under the supervision (requiring presence) of competent authorities?

Yes.

5.10 Which one of the following self-check activities do you consider to be included in a (future) definition of meat inspection?

5.10.1 Self checks carried out in the slaughterhouse by food business operators verified by a minimum requirement for checks by the competent authority and audited by the competent authority?

5.10.2 Self checks carried out in any other food processing plant by food business operators verified by a minimum requirement for checks by the competent authority and audited by the competent authority?

5.10.3 Self checks carried out in the slaughterhouse by food business operators verified by a minimum requirement for checks by the competent authority with alert criteria for verification by the competent authority?

We consider these to all be aspects of meat inspection. What is appropriate to different circumstances will depend on the nature of the self-checks and the minimum requirement for checks by the competent authority that are proposed.

5.11 Which one of the following sampling activities do you consider to be included in a (future) definition of meat inspection?

- 5.11.1 *Sampling/ inspection activities at primary production by competent authorities?*
- 5.11.2 *Sampling activities at primary production by food business operators, verified by a minimum requirement for sampling by the competent authority at the same stage?*
- 5.11.3 *Sampling activities at primary production by food business operators verified by a minimum requirement for sampling by the competent authority at the same or another (eg. slaughterhouse) stage?*
- 5.11.4 *Sampling activities at primary production by food business operators, without any minimum requirement for sampling by the competent authority?*

We consider that the first three should be included but do not agree with the last one, as we consider that sampling activities have to be defined by the competent authority and take into account the relative risk of the food business.