

**Non-papers on the delegated and  
implementing acts based of  
Regulation (EU) 2017/625 on Official  
Control (including meat inspection)  
- UECBV comments -**

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# Preliminary remark

## The new Official Control Regulation (OCR) no. 2017/625

### OCR, article 18, point 9:

“While complying with the objectives of this Regulation and in particular as regards food safety requirements, the Member States may adopt national measures implementing **pilot projects** limited in time and extent, to evaluate alternative practical arrangements for the performance of official controls on the production of meat. Those national measures shall be notified in accordance with the procedure laid down in Articles 5 and 6 of Directive (EU) 2015/1535. The outcome of the evaluation conducted through the pilot projects shall be communicated to the Commission as soon as available.”

**We welcome this formulation in the new OCR that enables new technology to be tested under practical conditions in order to evaluate the benefit of implementing the use of this new technology in the production of meat.**



I. Delegated act

II. Implementing act



## I. Delegated act



# Non-papers dealing with the delegated act (DA)

**DA, page 8, article 3 (1) and 3 (2):**

It's our understanding that references to “**under the supervision of the official veterinarian**” and “**under the responsibility of the official veterinarian**” means whether the OV is present at the establishment or not, respectively.

**DA, page 8, article 3 (2):**

Why move AM from within 24 hours of arrival to on the day of arrival? This will be an issue for deliveries on the previous evening, before midnight, for slaughter the following day.



# Non-papers dealing with the delegated act (DA)

## DA, page 10, article 6 (1):

It's our understanding that this refers to PM in slaughterhouses, where "slaughter is discontinuously carried out" (Annex II in DA Annex). But in 854/2004, Annex I, Section III, Chapter I the OA may assist the OV "in relation to PM inspection" (in all type of slaughterhouses). We think it needs to be clarified that this possibility is maintained in the new legislation.

## DA, page 10, article 6 (2):

It's our understanding that the **auditing activities** of the staff is limited to collection of the information regarding good hygiene practices and HACCP-based procedures, and not evaluation/auditing of these information.



## II. Implementing act



# Non-papers dealing with the implementing act (IA)

Legislation: Draft implementing acts regarding Article 18(8) in the new OCR, version 2 of 20 September 2017

Two parts – IA and IA Annex

IA, page 7, article 3, point (2), (a):

This point deals with products of animal origin that – to the extent possible – comply with “microbiological criteria laid down in accordance with Article 3 of Regulation (EC) No 2073/2005 within the context of **a food safety management system.**”

It's our understanding the food safety management system refers to HACCP-based systems, and we suggest that this should be clarified in the IA.





## Non-papers dealing with the implementing act (IA)

### IA, page 9, article 6, point (3):

This paragraph includes remarks on **third party certification**. We think it is important that when a slaughterhouse has signed up for voluntary external audits from independent third parties, it should be considered as **an extra layer of control**, and results of this control should not be used by the national competent authorities to penalize the plant. On the contrary when auditing a plant, its situation should be looked at as a whole and its weak points put in perspective with its strong point resulting in **balanced audits**.



## IA, page 10, article 9, point (1):

We suggest the following alteration to the text, because we think that either several corrective actions should be mentioned or none at all:

“The speed of the slaughter line and the number of inspection staff present shall be such as to allow for proper inspection. ~~The speed of the slaughter shall be reduced or other~~ Corrective action shall be taken immediately, if faecal contamination is detected on external surfaces, including those of body cavities, to an extent not acceptable for the competent authority. The competent authority should increase the intensity of inspection until such time as it is satisfied that the FBO has regained control of the process.”



## Non-papers dealing with the implementing act (IA)

IA, page 21, article 25, point (1), (p) and point (2):

This excepts meat with organoleptic anomalies caused by a **pronounced sexual odor** to be declared unfit for human consumption and instead makes it a possibility for the official veterinarian to impose requirements for the use of such meat.

**Sexual odor is not a** food safety issue but a meat quality issue, and this should be the responsibility of the establishment to deal with such meat.



## AI Annex, page 2-4, annex I, chapter I, point A and B: Meat inspection in bovines

Must be reviewed taking into account new knowledge (EFSA Opinion from 2013 on meat inspection in bovines etc.)

Must be risk based.

### Focus points

- Age limit
- Incision of the masseters (cysticercosis)
- Visual inspection (tuberculosis)



# Non-papers dealing with the implementing act (IA)

## AI Annex, page 2-4, annex I, chapter I, point A and B: Meat inspection in bovines

- **The age limit** should be **12 months** and not 8 months
  - Risk assessment shows prevalence of cysticercosis rises with age – especially from 1.5-2 years and up,
  - depends on the sex of the animal and the production type.
- **No incision of the masseters for indoor-raised males < 20 months**
- **Incision of the masseters:**
  - Females > 12 months
  - All outdoor raised males > 12 months
  - All males > 20 months (no matter production type)
- The age limit would also allow for even conditions for all European calves, because the age limit for calves in the EU is 12 months.
- How to do: Use of FCI.



# Non-papers dealing with the implementing act (IA)

## AI Annex, page 2-4, annex I, chapter I, point A and B: Meat inspection in bovines

### Visual inspection:

- Animals < 12 months from countries totally free of bovine tuberculosis
- No palpation of the lymph nodes – only visual inspection.
- Countries that have done an effort to combat TB should be rewarded; this will also be an incentive for other countries to follow this path.
  
- It is important to differentiate between countries totally TB free (the infection doesn't exit) and countries officially TB free (some infection is still accepted in the country).



# Conclusion

**UECBV welcomes the chance to discuss the new legislation**

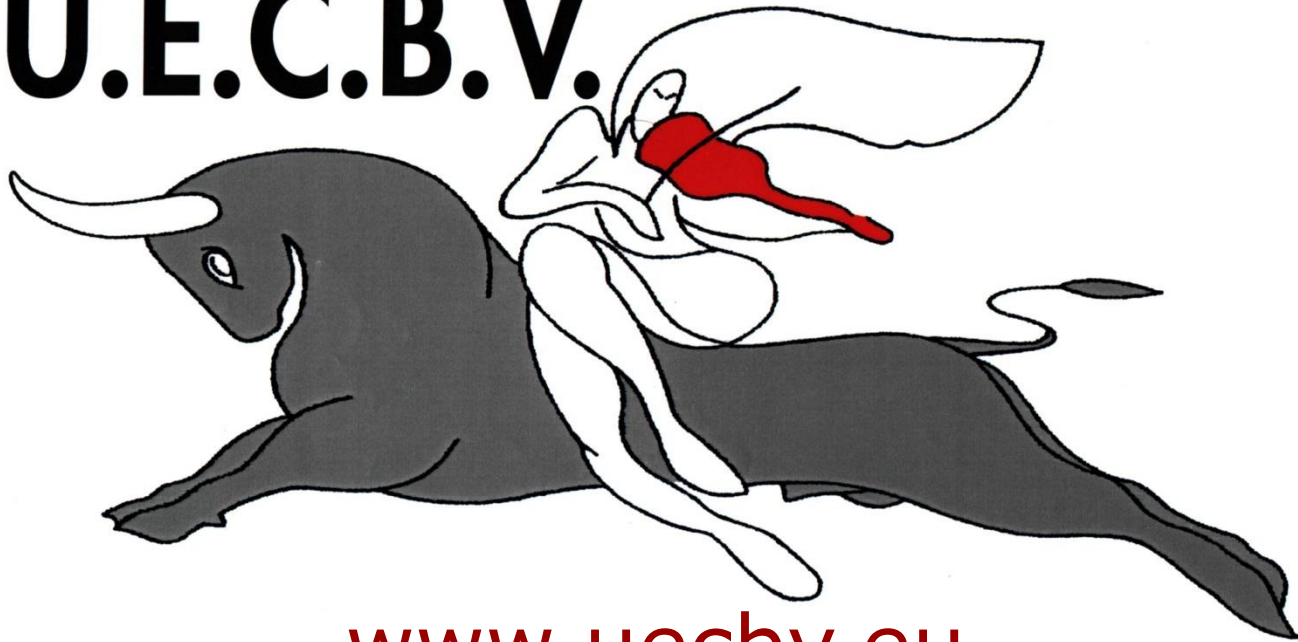
**Key words for the future:**

- **Risk based approach taking into account new knowledge and technology to maintain the high food safety in the EU**
- **Open interdisciplinary discussion between the authorities and relevant stakeholders**



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**Thank you very much for your attention!**