



**Comments for the delegated and implementing acts based on the new
Official Control Regulation – poultry meat inspection**

**Advisory Group ad hoc working group meeting on the
revision of official controls in food of animal origin
7 November 2017**

**AVEC - Association of Poultry Processors
and Poultry Trade in the EU countries**



Legislative Background

- (Nov 2009) Council Conclusions on the Commission report invited the Commission to prepare concrete proposals allowing the effective implementation of modernised sanitary inspection in slaughterhouses while making full use of the principle: '**risk-based approach**';
- (Jun 2012) EFSA scientific opinion recommended **improvements to existing practices or alternative methods for the inspection of meat.**



New Official Control Regulation (EC) 2017/625

AVEC welcomes the opportunity to move in the direction of a more risk based poultry meat inspection.

The importance of allowing :

Poultry meat inspection has to be modernized to assure that the tasks performed are **risk-based, public-health-focused and aligned with current technology.**



Moving to **microbiological audit instead of visual inspection** as the main Official Control may best reflect the risks in the **whole production chain.**

Improved cooperation

The guiding principle throughout is that food business operators bear full responsibility for the safety of the food they produce

Competent Authorities + more participation of FBOs



The aim is to ensure food safety, animal health and welfare and public health thanks to a optimisation in sharing responsibilities.

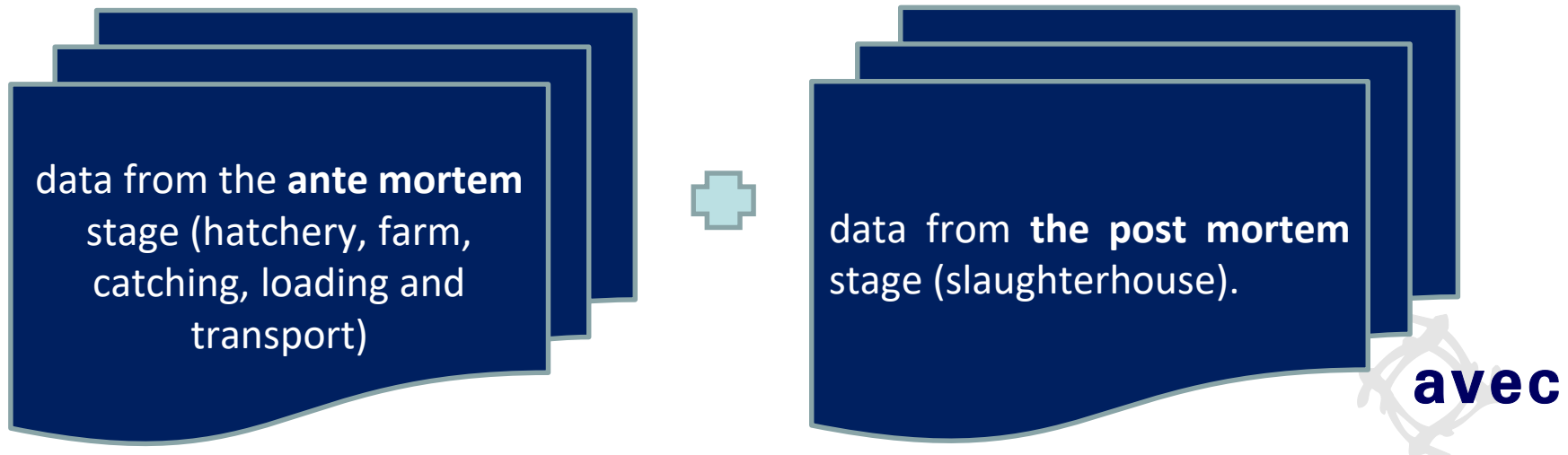
Poultry Food Chain Information (FCI)

Poultry sector = integrated sector



Many data area available as basic information in the FCI system

The poultry FCI system has two **interconnected levels for data**:
and data from **the post mortem** stage (slaughterhouse).



Post – mortem / Microbiological Meat Hygiene

The current Legislative framework allows an **effective and objective testing and assessment** of presence of bacteria present on the surface of carcass.

Pilot project: (FRANCE)

French Pilot project: Proposition for modernization of poultry meat inspection



Key points

- AVEC asks for the adaptation and optimization of the resources in the poultry meat inspection = **participation of FBO to official tasks + microbiological inspection.**
- AVEC welcomes the opportunity to move in the direction of a more **risk based poultry meat inspection.**

Key points

- AVEC welcomes the opportunity of **keeping the flexibility** to have AM and PM-checks carried out by slaughterhouses staff. (under supervision/ responsibility of the food and safety authority).
- AVEC would like to propose a **better distinction** between the meat inspection tasks carried out for poultry and other species.

Regulation (EU) 2017/625

AVEC welcomes the opportunity of keeping the possibility **to have AM and PM-checks carried out by slaughterhouses staff (under supervision/ responsibility of the authorities)**

Article 18.2(b) :

2. *The official controls referred to in paragraph 1 performed in relation to the production of meat shall include:*

(b) by way of derogation from point (a), as regards poultry and lagomorphs, the ante-mortem inspection performed by an official veterinarian, under the supervision of the official veterinarian or, where sufficient guarantees are in place, under the responsibility of the official veterinarian;

(...)

Non-paper in view of a possible delegated act based on Article 18(7) of Regulation (EU) 2017/625

Article 2 – Definitions in delegated act **Article 2, point 2:**
“Staff designated by the competent authority”

The understanding of AVEC is that “Staff designated by the competent authority” means staff employed and paid by the company, but designated and trained by the competent authority.

Implementing Regulation

Article 9 - Post-mortem 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

In this specific situation other solutions than reducing the speed of slaughter are possible;

AVEC suggests to reformulate this sentence as: “*The FBO shall provide a plan of corrective measures if faecal contamination is detected on external surfaces, including those of body cavities, to an extent not acceptable for the competent authority.*”

Non-paper in view of a possible implementing act based on Article 18(8) of Regulation (EU) 2017/625

Article 11

*Official controls on specified **risk material** and other animal by-products*

(...)The official veterinarian shall ensure that the food business operator takes all necessary measures to avoid contaminating meat with specified risk material during slaughter, including stunning, and removal of specified risk material.

AVEC would like to suggest clarifying **this article is not relevant for poultry.**

Non-paper in view of a possible implementing act based on Article 18(8) of Regulation (EU) 2017/625 and Annexes

AVEC encourage the Commission to give thorough **guidance to MS authorities on interpretation and implementation of the legislation.**

This is to ensure, that the control of compliance with the legislation is carried out in the same way in all MS.

Thank you for your attention!

