

**Summary of substantive comments to the FSA consultation – proposed process  
for delayed and partial evisceration of poultry**

Respondent	Comments	FSA response
<p>1. Industry</p>	<p>I would like to respond to the FSA proposal to authorise, across all poultry abattoirs under the FSA control, the delayed and partial evisceration of poultry.</p> <p>How likely are you to take advantage of the proposed authorisation process for delayed or partial evisceration?</p> <p>We are a significant seller of both chilled and frozen poultry, although not a processor we do deal directly with a number of slaughterhouses that would be encompassed by this proposal. We have had no interest from our customers in supplying this style of production of poultry and would have concerns with this process if we were asked to supply.</p> <p>The report produced by the University of Lincoln together with the FSA et al. in 2014 leaves me with concerns regarding the potential for subsequent Campylobacter cross contamination of the final carcass. The 2014 Report noted a slower chilling time for the semi-eviscerated carcass and is also ambiguous in the potential for cross-contamination occurrence “ and, assuming a general level of compliance with regulations and basic hygiene practices , are unlikely to be responsible for anything more than sporadic individual infection events in humans” Quote from Final Report , Executive Summary FS101044 30/6/2014.</p> <p>We have been very supportive of the FSA initiative to reduce the levels of Campylobacter in poultry and</p>	<p>We envisage the uptake for either of these processes will be very low and be far less than 1% of total UK throughput. These processes will not be of interest to the fully automated slaughterhouses where speed of throughput is pivotal to their business.</p> <p>Quote from <b>the Final Report Qualitative Risk Assessment to support a policy decision on partially-eviscerated (effilé) poultry production</b> <b>FS101044</b></p> <p><b>The main conclusion from the risk assessment was that while there are risks of zoonotic infection to the consumer associated with preparation and consumption of partially-eviscerated (effilé) poultry, these risks are generally no different to those associated with the preparation and consumption of traditionally processed poultry. Therefore, it is the author’s view that the production of partially-eviscerated birds in the UK, subject to the controls outlined in their report, would not result in any significantly increased risk to public health than current poultry processing.</b></p> <p>Delayed evisceration can only take place in an approved slaughterhouse or cutting plant located in the same Member State as the farm of production. Carcasses and offal must pass post-mortem inspection to be classed fit for sale for human consumption.</p> <p>Post-mortem inspection must be carried out by an Official Veterinarian (OV) or Meat Hygiene Inspector (MHI) appropriately authorised under Regulation (EC) 854/2004 (or appropriately authorised slaughterhouse staff in poultry or rabbit slaughterhouses) working under the supervision of an OV</p>

work closely with our suppliers to ensure progress in this field. This proposal to allow the retention of offal inside carcasses after slaughter for some period of time is concerning. The possibility of cross contamination at some unspecified later date with no information as to where the subsequent final evisceration will take place and whose oversight will it be under is also concerning.

Will the authorisation of delayed or partial evisceration benefit your business?

We see no benefit to our business, we don't envisage it opening a new market, increase production or reduce production costs.

Do you perceive any burdens from the proposed authorisation process for delayed or partial evisceration?

We see a potential retrograde step in the FSA fight against the pernicious illness caused by Campylobacter poisoning for minimal, if any, commercial benefit.

The following conditions will be considered by the OV prior to the process commencing:

- The FBO to put in place, implement and maintain a permanent procedure or procedures based on the HACCP principles for this process.
- Viscera can be left in the carcass after slaughter for not longer than 15 days at a temperature of not more than 4°C. This reflects the requirements in Regulation 853/2004 (Annex III, Section II, Chapter VI, paragraph 9) for the delayed evisceration of poultry slaughtered on-farm. If FBOs wish to apply other time/temperature combinations, they will need to produce a risk assessment using HACCP principles to support any deviation from this criterion.
- Uneviscerated carcasses should either be kept in a separate chiller, or if this is not possible, sufficiently separated from any other carcasses or food stuffs to prevent the risk of cross-contamination.
- When evisceration takes place, the viscera in the body cavity will need to be completely removed in a hygienic manner. In cases where the intestinal tract is ruptured and subsequently contaminates the carcass or offal the contaminated parts must be either trimmed or thoroughly washed with potable water or, where required, disposed of as animal by-products.
- FBOs will need to adjust the processing lines for this operation to ensure that post-mortem inspection can be carried out effectively.

Respondent	Comments	FSA response
2. Via SurveyMonkey	<p>Q1 <b>Name (optional)</b></p> <ul style="list-style-type: none"> <li>• Respondent skipped this question</li> </ul> <p>Q2 <b>Are you responding as a private individual or on behalf of an organisation / company? Please include details of any stakeholders your organisation represents.</b></p> <ul style="list-style-type: none"> <li>• Individual</li> </ul> <p>Q3 <b>Do you agree with the FSA proposals regarding the authorisation of poultry establishments for delayed evisceration production?</b></p> <ul style="list-style-type: none"> <li>• Disagree</li> </ul> <p>Q4 <b>Do you agree with the FSA proposals regarding the authorisation of poultry establishments for partial evisceration or effilé production?</b></p> <ul style="list-style-type: none"> <li>• Disagree</li> </ul> <p>Q5 <b>The costs to Industry are deemed to be negligible; however we would welcome stakeholder opinions on the impact on Food Business Operators of implementing these procedures on a formal basis.</b></p> <ul style="list-style-type: none"> <li>• Respondent skipped this question</li> </ul> <p>Q6 <b>How likely are you to take advantage of the proposed authorisation process for delayed or partial evisceration of poultry?</b></p> <ul style="list-style-type: none"> <li>• Very unlikely</li> </ul> <p>Q7 <b>If you answered likely or very likely to Q6 how with the authorisation of delayed or partial evisceration will this benefit your business?</b></p> <ul style="list-style-type: none"> <li>• Respondent skipped this question</li> </ul>	

Q8

***Will the authorisation for delayed or partial evisceration - Open a new market?***

- Unlikely

Q9

***Will the authorisation for delayed or partial evisceration - Increase production?***

- Respondent skipped this question

Q10

***Will the authorisation for delayed or partial evisceration - Reduce production costs?***

- Probably would not

Q11

***Will the authorisation for delayed or partial evisceration - Increase production costs?***

- Probably would

Q12

***Do you perceive any burdens from the proposed authorisation process for delayed or partial evisceration?***

- Respondent skipped this question

Respondent	Comments	FSA response
<p>3. Via SurveyMonkey</p>	<p>Q1 <b>Name (optional)</b> Name supplied</p> <p>Q2 <b>Are you responding as a private individual or on behalf of an organisation / company? Please include details of any stakeholders your organisation represents.</b></p> <ul style="list-style-type: none"> <li>• Private individual</li> </ul> <p>Q3 <b>Do you agree with the FSA proposals regarding the authorisation of poultry establishments for delayed evisceration production?</b></p> <ul style="list-style-type: none"> <li>• Strongly disagree</li> </ul> <p>Q4 <b>Do you agree with the FSA proposals regarding the authorisation of poultry establishments for partial evisceration or effilé production?</b></p> <ul style="list-style-type: none"> <li>• Strongly disagree</li> </ul> <p>Q5 <b>The costs to Industry are deemed to be negligible; however we would welcome stakeholder opinions on the impact on Food Business Operators of implementing these procedures on a formal basis.</b></p> <ul style="list-style-type: none"> <li>• Respondent skipped this question</li> </ul> <p>Q6 <b>How likely are you to take advantage of the proposed authorisation process for delayed or partial evisceration of poultry?</b></p> <ul style="list-style-type: none"> <li>• Very unlikely</li> </ul> <p>Q7 <b>If you answered likely or very likely to Q6 how with the authorisation of delayed or partial evisceration will this benefit your business?</b></p> <ul style="list-style-type: none"> <li>• Respondent skipped this question</li> </ul>	<p><b>Response to Q12</b></p> <p>Quote from the Final Report Qualitative Risk Assessment to support a policy decision on partially-eviscerated (effilé) poultry production FS101044</p> <p>The main conclusion from the risk assessment was that while there are risks of zoonotic infection to the consumer associated with preparation and consumption of partially-eviscerated (effilé) poultry, these risks are generally no different to those associated with the preparation and consumption of traditionally processed poultry. Therefore, it is the author's view that the production of partially-eviscerated birds in the UK, subject to the controls outlined in their report, would not result in any significantly increased risk to public health than current poultry processing.</p>

Q8

***Will the authorisation for delayed or partial evisceration - Open a new market?***

- *Respondent skipped this question*

Q9

***Will the authorisation for delayed or partial evisceration - Increase production?***

- *Respondent skipped this question*

Q10

***Will the authorisation for delayed or partial evisceration - Reduce production costs?***

*Respondent skipped this question*

Q11

***Will the authorisation for delayed or partial evisceration - Increase production costs?***

- *Respondent skipped this question*

Q12

***Do you perceive any burdens from the proposed authorisation process for delayed or partial evisceration?***

- *The Burden will be on the consumer when this proves to be dangerous.*

Respondent	Comments	FSA response
4. Via SurveyMonkey	<p>Q1 <b>Name (optional)</b> Christian name supplied</p> <p>Q2 <b>Are you responding as a private individual or on behalf of an organisation / company? Please include details of any stakeholders your organisation represents.</b></p> <ul style="list-style-type: none"> <li>• Private Individual</li> </ul> <p>Q3 <b>Do you agree with the FSA proposals regarding the authorisation of poultry establishments for delayed evisceration production?</b></p> <ul style="list-style-type: none"> <li>• Agree</li> </ul> <p>Q4 <b>Do you agree with the FSA proposals regarding the authorisation of poultry establishments for partial evisceration or effilé production?</b></p> <ul style="list-style-type: none"> <li>• Agree</li> </ul> <p>Q5 <b>The costs to Industry are deemed to be negligible; however we would welcome stakeholder opinions on the impact on Food Business Operators of implementing these procedures on a formal basis.</b></p> <ul style="list-style-type: none"> <li>• Positive Input Ventilation must be put in place during effile production (defeathering) and air extraction must reduce the concentration of dust and aerosol, avoiding contamination of dressed carcasses</li> </ul> <p>Q6 <b>How likely are you to take advantage of the proposed authorisation process for delayed or partial evisceration of poultry?</b></p> <ul style="list-style-type: none"> <li>• Neither likely nor unlikely</li> </ul>	<p><b>Response to Q5</b></p> <p>Food business operators (FBOs) are required to comply with the following legal requirement.</p> <p>Legal requirement 853/2004 Annex III Section II Slaughter Hygiene: Chapter IV point 5 D8. ... skinning or plucking, ... and other dressing must be carried out without undue delay in such a way that contamination of the meat is avoided.</p> <p><a href="https://www.food.gov.uk/sites/default/files/media/document/chapter12-dressing_of_carcases-final_version-2_1.pdf">https://www.food.gov.uk/sites/default/files/media/document/chapter12-dressing_of_carcases-final_version-2_1.pdf</a></p> <p>FBO's must also put in place, implement and maintain a permanent procedure or procedures based on the HACCP principles when producing delayed or partial evisceration poultry.</p>

Q7

***If you answered likely or very likely to Q6 how with the authorisation of delayed or partial evisceration will this benefit your business?***

- n/a

Q8

***Will the authorisation for delayed or partial evisceration - Open a new market?***

- Likely

Q9

***Will the authorisation for delayed or partial evisceration - Increase production?***

- A moderate amount

Q10

***Will the authorisation for delayed or partial evisceration - Reduce production costs?***

- Probably would

Q11

***Will the authorisation for delayed or partial evisceration - Increase production costs?***

- Probably would not

Q12

***Do you perceive any burdens from the proposed authorisation process for delayed or partial evisceration?***

- no