To All Red Meat Slaughterhouses and Interested Parties in Great Britain

8 January 2014

Dear Sir/Madam

PROPOSED CHANGES TO ENFORCEMENT OF THE CERTIFICATION REQUIREMENTS FOR ANIMALS SUBJECT TO EMERGENCY SLAUGHTER

Background
The Food Standards Agency (FSA) has been reviewing the policy of allowing the bodies of animals slaughtered on farm, that have suffered an accident preventing transport of the animal to a slaughterhouse, to be accepted by slaughterhouses when the required certification accompanying the slaughtered animal is incomplete or unsatisfactory. In such cases the required certification has either not been completed satisfactorily or the legal requirement for the Veterinary Practitioner to certify the date and time of slaughter has not been provided.

The FSA held a meeting to discuss emergency slaughter certification issues on the 18 June 2013 with representatives of a number of professional veterinary associations. It was agreed that in order to address this issue a change would need to be made to the emergency slaughter certification instructions within the FSA’s Manual for Official Controls (MOC) to accurately reflect that all the requirements of Regulation (EC) 853/2004 for certification by a veterinarian of animals subject to emergency slaughter must be fully met.

This requires: ‘A declaration issued by the veterinarian recording the favourable outcome of the ante-mortem inspection, the date and time of, and reason for, emergency slaughter, and the nature of any treatment administered by the veterinarian to the animal, must accompany the slaughtered animal to the slaughterhouse.’

The MOC currently states that an Official Veterinarian (OV) at a slaughterhouse may accept an animal that has been slaughtered on farm and certified as an emergency slaughter animal by a veterinarian, even where some of the necessary information has not been provided

In practice the majority of veterinarians comply with these requirements, although the FSA is aware there are some cases where veterinarians have deleted the requirement to certify the date and time of slaughter on the certificate, effectively making the certificate incorrect. The reason for this is that the veterinarian is
unable to certify the date and time of slaughter because they were not present at
the time of slaughter.

At present, OV s are allowed to accept these carcases despite the incorrect
certification. In these cases the OV will decide what action to take, which could
include writing to the certifying veterinarian advising of the correct requirements of
an emergency slaughter certificate.

**Proposed change**
The FSA proposes to change the MOC instructions to reflect the requirements of
the EU Legislation. This would mean that where incorrect emergency slaughter
certification is presented to the slaughterhouse with a slaughtered animal the OV
will first establish if the veterinarian can provide a correct certificate. If the
veterinarian is unable to provide correct certification then the OV will reject the
animal as unfit for human consumption.

**Option 1 – Do nothing:** Maintaining the current arrangements is not seen as a
viable option as allowing the incorrect completion of emergency slaughter
certification to carry on is not in compliance with the requirements of Regulation
(EC) 853/2004 (Annex III, Section I, Chapter VI, Paragraph 6) and it is likely that
confusion around emergency slaughter certification will continue.

**Option 2 - To change the MOC instructions to accurately reflect the requirements
of Regulation (EC) 853/2004, meaning that the correct emergency slaughter
certification must accompany the slaughtered animal.**

**Option 3 - To change the MOC instructions as detailed in Option 2 and introduce
a transitional change period of 6 months to enable farmers, veterinarians and
FBOs to familiarise themselves with the changes and put in place appropriate
provisions. This will also allow the FSA and other organisations to better assess
impacts of the change and monitor the number of non-compliances.**

**Question for stakeholders:**
Do you agree that a 6-month transitional measure is necessary to enable farmers,
veterinarians and FBOs to familiarise themselves with the changes and put in
place appropriate provisions?

To correctly certify an animal in accordance with the requirements of Regulation
(EC) 853/2004 Annex III, Section I, Chapter VI, Paragraph 6, there are a range of
options for the farmer or owner of the animal as detailed:

i) Arrange for the veterinarian to visit at the same time as the slaughterman,
which will have minimal impact on the time spent by a veterinarian on farm.

ii) Arrange for the veterinarian to carry out the slaughter themselves (this is the
current practice in Northern Ireland). This would have minimal impact as the
veterinarian would already be present. However, some veterinarians may not feel confident in carrying out the slaughter themselves.

iii) Arrange for the veterinarian to wait until a slaughterman arrives to slaughter the animal, or ask the veterinarian to return to the farm at a pre-determined time to observe the slaughterman slaughter the animal and for the veterinarian to then be able to correctly certify the date and time of slaughter.

The FSA recognises that in some cases an instant decision on the suitability of the animal for emergency slaughter may not be possible and, at the discretion of the veterinarian, a delay to slaughter may be imposed to allow 24 hours, with pain relief administered to the animal, to assess whether there is a possibility of the animal recovering from the injury.
In this case there is the impact of an additional cost for increased veterinary time or a return visit. In such cases there is also the impact on the animal of pain and suffering caused by the delay.

Veterinary time is currently in the region of £90.00 per hour, although this varies throughout the country. In a worst case scenario a veterinarian would not allow such a case to be left more than 1-2 hours so either waiting or returning would result in a cost that should be no more than £90.00 - £100.00. In some cases it may be an option for the veterinary surgeon to administer pain relief and return in 24 hours to assess the case, meeting with a slaughterman when there are no signs of recovery. In such a case there would be no additional financial impact if that course of action would have been considered originally.

It should be noted that in the majority of emergency slaughter cases the animal concerned will have suffered an accident and/or injury and may be in pain or suffering. Any undue delay in slaughter would have an impact on the quality of life of the animal for that period of time, unless short term pain relief with a short withdrawal period is administered. The veterinarian will take these factors into account when examining the animal or discussing with the farmer during the initial point of contact.

If it is likely that there will be a delay in a slaughterman being available the veterinarian will consider if they should either slaughter and bleed the animal themselves prior to transport to an approved slaughterhouse or alternatively kill the animal for the farmer to dispose of through the fallen stock scheme.

An additional consideration is that if the animal is refused a certificate by the veterinarian or the availability of a slaughterman is such that the veterinarian kills the animal there is a cost to the farmer for disposal under the fallen stock scheme. This would be the normal means for disposal of a dead animal on farm. The costs for the farmer to dispose of an animal varies around the country, but is estimated to be in the range of £100.00 - £250.00.
Summary of financial impacts
Any financial impacts will primarily fall on the owner of the animal. The owner may decide not to utilise emergency slaughter provisions because of increased costs. In a worst case scenario the additional cost to the farmer of an emergency slaughter case would not normally exceed £100.00 and this could in most cases be reduced with some forward planning.

Question for livestock owners:
Do you think our estimate of the additional cost to you of an emergency slaughter case as a maximum of £100 is reasonable? If not, please give us your estimate of the cost and reasons for your figure(s).

There could be a potential financial impact to slaughterhouse operators if fewer emergency slaughter animals are presented due to closer adherence to the legislation and farmers are unwilling to pay for additional time and associated costs for the veterinarian to correctly certify the emergency slaughter.

In the period October 2012 to October 2013 FSA records for England, Scotland and Wales, indicate that 7353 cattle were sent to slaughterhouses as emergency slaughter animals. There are no records held centrally to indicate the number which are incorrectly certified. As a consequence the impact of refusing to accept incorrectly certified carcases cannot be estimated. It would be reasonable to make a presumption that if an animal is fit for human consumption and can be correctly certified by a veterinarian on the farm the farmer would be prepared to accept the additional cost, if any, of veterinary time in view of the potential saving over that of using the fallen stock scheme.

Please send any comments on the proposed changes and, in particular, the impact of these changes to marcelle.deaton@foodstandards.gsi.gov.uk no later than 18 February 2014.

Yours faithfully,

Collin W Willson B. Vet. Med., MRCVS
Veterinary Manager and Welfare Project Manager