Report of Working Group Meeting
- implementation of the EU food hygiene regulations –

12th October 2012

Below is a summary of the main points of discussion:

**Agenda Item 1: Proposed revision of pig inspection:**

First discussion of three proposals to amend the hygiene regulations in relation to pig inspection. A number of Member States (MS) said they needed more time to consult stakeholders and to further scrutinise the texts.

**Delegation of Ante-mortem Tasks to Official Auxiliaries**

Discussion opened on the proposal to expand the role of Official Auxiliaries (OA) in ante-mortem.

Many concerns raised by MS (as might be expected at a first discussion) although support too for the proposed risk-based approach. One MS pressed for a unified Food Chain Information document, saying there were inconsistencies and that European Food Safety Authority (EFSA) had reported this was useful information. The issue of how changes would be perceived by third countries was raised. The UK welcomed the proposed approach, supporting the risk-based approach.

In response to specific MS comments, the Commission (Cion) noted that the proposal was for the OA to separate ‘normal’ from ‘abnormal’ animals but the Official Veterinarian (OV) would still have overall responsibility. Cion confirmed that the proposals relate to slaughterhouses only. Cion indicated that the OV would look at all animals. Cion confirmed that the proposal did not extend ante-mortem to slaughterhouse staff and that discontinuous slaughter rules will remain the same. Cion will reflect further on comments.

**Visual Inspection at Post-mortem**

The Cion noted that EFSA had found that incision and palpation do not address key public health hazards and can lead to cross-contamination. Cion proposal was not to require palpation and incision at post-mortem as routine. This was supported by some MS. It was suggested that palpation and incision tasks to be carried out should be decided on a risk basis at post-mortem examination (e.g. a welfare issue should not trigger the full list of palpation/incision). One MS noted that the proposal did not make it clear that the outside of the carcase needed checking. It was asked whether young animals’ umbilical regions and joints would be inspected. Cion will reflect on this and other questions.

In regard to visual inspection, one MS noted that no need for tonsils to be removed early. Cion said tonsils heavily contaminated and it would reflect on this issue.
Salmonella

Cion noted EFSA conclusion that Salmonella was the main hazard and that rules needed strengthening. Cion set out proposal to make it clear that an action plan was required from food business operator (FBO) when FBO non-compliant with a process hygiene criterion. Cion also presented a graph of results from the baseline survey of salmonella spp results and carcase swab results, which the Cion felt were too high and possibly suggested that insufficient action was being taken as a result of process hygiene criteria findings.

Various comments from MS including reservations about including data in annual monitoring reports and reservations about proposed five-fold increase in testing for Salmonella as a process hygiene criterion. Some MS did not consider that there was enough evidence to justify the proposal. Some MS wanted sampling reductions for small businesses. One MS queried whether there would be proposals for Yersinia (also recognised as a hazard by EFSA).

Cion will reflect on comments. Cion noted that flexibility already existed, that the proposal represented a risk management decision. Cion again stressed the need to strengthen existing controls.

Trichinella

The Cion explained that the proposed amendments reflected EFSA views on pig inspection. Implications for international trade have been considered. Cion explained that the proposal features change to systematic sampling related to controlled housing conditions as evidence suggests controlled housing conditions are a negligible risk.

Main concern raised by MS was in regard to suggested minimum of 10% of animals slaughtered per controlled housing condition holding. Some MS felt small farms would struggle with this number. Some MS felt there was a difference in risk between fattening and breeding pigs. UK raised a number of points, including about the criteria for demonstrating negligible risk status. A large number of other specific technical points were raised by MS and the Cion asked MS to write in on points of detail.

Cion noted that while in respect of controlled housing conditions testing shouldn't be necessary, a certain level of monitoring needed to be introduced to give confidence. Cion was open to views on monitoring. Cion will look at whether “immediate” would be more appropriate than “24 hour” disposal of dead animals. Cion noted concerns raised by MS about exports.

Agenda Item 2: Guidance on meat preparations and meat products

The Cion introduced a discussion paper (attached for information) with proposed amendments to the guidance document on 853/2004. While admitting that a ‘borderline’ existed between meat ‘products’ and meat ‘preparations’, the Cion
strongly seeks harmonisation of views on the various processes producing foodstuffs covered by these two definitions. The issue had been highlighted by the fact that many additives are now used and one MS had sought to resolve this in additives working groups - this had been referred to hygiene working groups. MS responses did not show a qualified majority support.

Mixed views from MS on the proposed amendments; comments included that for example ‘marination’ perceived differently across countries and does not always ‘process’ meat (i.e. in that it would not necessarily lead to muscle structure change). It was also noted that some examples were specific to particular countries and would not be known in others.

The UK said it would prefer decisions being made on a case-by-case basis; while noting understanding of the Cion’s difficulties, the UK did not agree with some of the examples (e.g. marinating and curing) and felt that they could lead to a loss of flexibility in FBO decision-making.

Cion continued to stress that it sought harmonisation and did not support a case-by-case approach despite recognition that there were “grey areas”. The Cion said it would discuss internally and report back on possible next steps.

**Agenda Item 3: Guidance on the term ‘obviously contaminated’ in relation to parasites in fishery products.**

The Cion introduced the paper (attached) which proposes amendments to the guidance document on 853/2004 and described the issues, notably trade, it had tried to address.

UK welcomed the guidance, and thanked Cion for including the revisions sent by email. UK queried the inclusion of the Codex references, and requested, if the references could not be deleted, that Cion made it clearer that they were guidance for EU FBOs and not requirements. Cion will reflect, but felt it important to keep Codex references in the document due to feedback from some third countries that EU standards were more stringent than Codex (Cion wanted to dispel this idea).

Cion noted the points raised and would look again at the guidance.

**Agenda Item 4: MS proposal to allow meat from emergency slaughtered animals to go on internal market if heat treated**

One MS had produced a document suggesting that meat from emergency slaughtered animals could be placed on the internal market if it has undergone some heat treatment (currently such meat is for national markets only). Strong support from MS, including the UK, for placing such meat on the internal market regardless of heat treatment. Cion sympathetic to MS position and will consider further.
Agenda Item 5: Presentation by one MS on Toxoplasma in imported non-frozen meat.

Focused on the finding of atypical strains commonly associated with South America and called for consideration of further controls on meat imports from there. Little comment by MS except the need for further data. The Cion cited improved risk management as well as a need for further data.

AOB: Dates of freezing fish products:

One MS suggested an amendment to Regulation (EC) 16/2012 - supported by UK in writing prior to meeting - to clarify the freezing requirements for fish products. General MS support for the suggested amendment. Cion recognised that MS are having difficulties in interpreting the rules in this case. Cion said that it would consider MS comments and a possible amendment, but would not welcome a long discussion on it. MS to send in further views.

AOB: ID marks on boxes of offal.

One MS raised concerns about this in relation to a FVO finding that ID marks on such boxes should be broken and there should be no other ID marks at all on the box. Short discussion revealed that this may be practised by industry in several MS, and that those MS had no undue concerns raised about it. However, one MS was cautious about implications. Cion would reflect.

Date of next meeting

Last week of November / early December 2012.