

**REQUEST FOR FLEXIBILITY**  
**and**  
**ADOPTION OF NATIONAL MEASURES**

**Regulation (EC) 852/2004**

Regulation 852/2004 paragraph 15 states that

**“The HACCP requirements should take account of the principles contained in the Codex Alimentarius. They should provide sufficient flexibility to be applicable in all situations, including in small businesses. In particular, it is necessary to recognise that, in certain food businesses, it is not possible to identify critical control points and that, in some cases, good hygienic practices can replace the monitoring of critical control points”**

Many small slaughterhouses fall into this category. Annex I provides a sample hazard analysis and risk assessment for beef and lamb slaughter. As can clearly be seen, no critical control points are identified as good hygienic practices are in operation.

and

**“In addition, the requirement of retaining documents needs to be flexible in order to avoid undue burdens for very small businesses.”**

We request that any slaughterhouse with less than 5 employees working during the slaughter process is officially recognised as a very small business.

The retention of documents should be minimal and reasonable.

For example, when monitoring the temperature of a refrigerator, only abnormal readings should be documented. The service report and/or invoice from the service company should be sufficient documentation that there was a fault and that steps were taken to rectify it.

852/2004 also states that flexibility is important to enable the continued use of traditional methods and this must be remembered when this regulation is implemented.

Article 13 allows for national measures to be introduced amending and adapting Annexes I and II of 852/2004.

## **Foodstuff and Establishments Concerned**

The production of fresh meat (beef, lamb and pork) carried out in a small slaughterhouse (less than 5 employees working during slaughter process), which is sold through a butchers shop, in the same village or town. The same individual or company must own both the slaughterhouse and the shop.

## **Requirements To Be Adapted**

Annex II Chapter 1

### **2. This paragraph relates to the layout, design, construction, siting and size of food premises.**

The plants concerned are already licensed and deemed suitable to produce meat fit for human consumption. There should be no requirement to upgrade their premises further, unless they wish to expand their market share i.e. supply on a national basis from local area only.

### **4. An adequate number of washbasins is to be available, suitably located and designated for cleaning hands.**

There is no need to install knee operated or infra-red sensor taps.

Annex II Chapter 2

### **1. This paragraph relates to the surfaces including floors, walls, ceilings, windows and doors.**

If a particular surface does not meet the requirement stated, food business operators must satisfy the competent authority that other materials used are appropriate. The competent authority must be satisfied by the fact that meat has been produced for a number of years, safely and passed fit for human consumption and therefore the materials used are appropriate.

## **Summary**

We believe that implementing the national measures we have requested will allow the continuation of traditional methods of meat production in the United Kingdom, without comprising standards of hygiene.

We are asking that we be allowed to carry on using our traditional slaughter process which is valued by our local communities.

We urge the Commission, other Member States and the British government to agree to our requests.

## **Small Abattoir Federation**

John Chadwick (Chairman)

Paul Chadwick (Regional Representative – North)

Peter Evans (Regional Representative – South)

Peter Bevan (Regional Representative – Midlands)

William Lloyd-Williams (Regional Representative – Wales)