

REQUEST TO ADOPT
NATIONAL MEASURES

Regulation (EC) 853/2004

Article 10, Amendment and adaptation of Annexes II and III, paragraph 3 states:

“Member States, may, without comprising achievement of the objectives of this Regulation, adopt, in accordance with paragraphs 4 to 8, national measures adapting the requirements laid down in Annex III.”

The national measures shall have the aim of enabling the continued use of traditional methods at any of the stages of production, processing or distribution of food.

The Small Abattoir Federation, United Kingdom, has therefore, produced this document to request the implementation of national measures to allow traditional methods of slaughter in smaller slaughterhouses to continue.

John Chadwick (Chairman)

Paul Chadwick (Regional Representative - North)

Peter Evans (Regional Representative - East)

Simon Leech (Regional Representative – South)

Peter Bevan (Regional Representative – Midlands)

William Lloyd-Williams (Regional Representative – Wales)

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 III, Section I, Chapter II

1 (a) Slaughterhouses must have adequate and hygienic lairage facilities.

Many smaller slaughterhouses have had residential developments built around them and would find it very difficult, or more likely impossible to gain planning permission to build or improve lairage facilities. If no animals are kept on site overnight, this requirement should not be enforced and it must be acceptable to use the means of transport as a lairage facility/waiting pen – on a time basis, that is to say, arrangements are made so that animals arrive at the slaughterhouse and are slaughtered within a defined period of time.

1 (b) They must also have separate lockable facilities for sick or suspect animals.

Again, many smaller slaughterhouses would find it difficult to comply with this requirement for the reason given above. It should be sufficient for sick or suspect animals to be slaughtered last. However, it must be noted that it is an unknown or very rare occurrence for sick or suspect animals to be presented for slaughter at the establishments concerned.

2 To avoid contaminating meat, they must:

(a) have a sufficient number of rooms, appropriate to the operations being carried out.

Separation in time as required under 2 (c) should be acceptable for smaller plants. As stated previously, it is anticipated that many plants would not be granted the planning permission necessary to extend their premises.

(b) have a separate room for the emptying and cleaning of stomachs and intestines, unless the competent authority authorises the separation in time of these operations within a specific slaughterhouse on a case-by-case basis.

Separation by time must be allowed in all cases NOT on a case-by-case basis.

(c) ensure separation in space or time of the following operations:

(vi) packaging offal

Many smaller plants do not package offal and must not be forced to do so under this regulation.

2 (d) requires installations that prevent contact between the meat and the floors, walls and fixtures;

We would question whether such contact is of relevance. After dressing, the meat produced in these establishments comes into contact with other surfaces and objects including knives, tables and of course, people.

3. They must have facilities for disinfecting tools with hot water supplied at not less than 82°C, or an alternative system having an equivalent effect.

One facility is sufficient for disinfecting tools and it must be the decision of the plant owner/operator as to which system works best for his plant.

4. The equipment for washing hands used by the staff engaged in handling exposed meat must have taps designed to prevent the spread of contamination.

Elbow operated taps must be accepted, if these are the preference of the plant operator/owner, as these are used to prevent the spread of contamination in operating theatres and hospitals. There is no need to install knee operated taps or sensor taps.

5. There must be lockable facilities for the refrigerated storage of detained meat and separate lockable facilities for the storage of meat declared unfit for human consumption.

Many, if not all, smaller plants have never needed to store detained meat nor meat declared unfit for human consumption. These are small business with a reputation for excellence and it should be acceptable to implement a practical measure such as the physical separation from other carcasses.

6. There must be a separate place with appropriate facilities for the cleaning, washing and disinfection of means of transport for livestock.

During the foot and mouth outbreak, it became evident that many smaller plants were unable to comply with a similar requirement and were therefore unable to operate. As most smaller plants source their livestock locally, it must be acceptable for vehicles transporting animals to these plants, to be cleaned, washed and disinfected when they return to base subject to a maximum distance.

7. See point 1(b)

9. They must have an adequately equipped lockable facility, or where needed, room for the exclusive use of the veterinary service.

The definition of adequately equipped needs to be clarified. We suggest any space with sufficient lighting. Should the veterinary service require furnishings then the plant operator must be able to charge a rental at current market rate.

Annex III, Section 1, Chapter IV

1 (a) After arrival in the slaughterhouse, the slaughter of animals must not be unduly delayed.

This clause needs to be amended. We suggest it should read that any delay in the slaughter of animals must not cause the animals to become distressed or increase the stress level of the animals. It is possible that delays occur but given the size and layout of the plants concerned these do not usually cause distress to the animals.

4. Animals must be clean.

Given that the plant operator has ultimate responsibility for hygiene, the decision as to whether animals are clean should be his as per the standards required, laid down by the plant operator, to produce safe meat.

7. (b) **during the removal of hides and fleece:**

(i) **contact between the outside of the skin and the carcass must be prevented;**

and

(j) **operators and equipment coming into contact with the outer surfaces of hides and fleece must not touch the meat;**

We would suggest that the phrase "where possible" be added in order to maintain a common sense approach when applying this regulation. Consumers in the United Kingdom do not eat meat raw and the Food Standards Agency confirms that correct cooking kills any pathogens, which may exist on the meat.

10. The carcasses must not contain visible faecal contamination. Any visible contamination must be removed without delay by trimming or alternative means having an equivalent effect.

It must be the decision of the plant operator as to whether trimming or alternative means, e.g. washing, works best for his method of production. Cold trimming of contamination is also a lower risk method of removal than hot trimming.

20. If the slaughterhouse does not have lockable facilities reserved for the slaughter of sick or suspect animals, the facilities used to slaughter such animals must be cleaned, washed and disinfected under official supervision before the slaughter of other animals is resumed.

There is no need for this to be carried out under official supervision if all staff have been fully trained in how to clean, wash and disinfect the area concerned.

Annex III, Section 1, Chapter V

1. Carcasses of domestic ungulates may be cut into half-carcasses or quarters, and half carcasses into no more than three wholesale cuts, in slaughterhouses. Further cutting and boning must be carried out in a cutting plant.

This will lead to the unnecessary transportation of whole and half carcasses to approved cutting plants. For those plants without a local cutting plant, this will be prohibitively expensive. Many smaller plants are cutting and boning, without comprising hygiene, in slaughterhouses, once slaughtering and cleaning have been completed, and must be permitted to continue.

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 compromising standards of hygiene.

In many cases, we are asking that we be allowed to continue to produce meat as we have done for generations.

We ask that all smaller slaughterhouses, currently licensed to produce meat for the domestic market, are given automatic approval.

They must be given permission to supply their local market and granted exemption from the stringent regulations applied to those plants wishing to supply the national or international market.

We also ask that those smaller plants providing a service, whether slaughtering or cutting, continue to be allowed to do so.

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