

TEC FILES

An Update on Animal Welfare Regulations

On 1 January 2013, Reg EC No 1099/2009 will come into effect in all EU Member States. This will introduce a number of changes to welfare requirements for the slaughterhouse, moving the emphasis for monitoring and improving welfare to the Food Business Operator.

The regulation introduces new definitions for the slaughter process:

- Slaughter means killing animals intended for human consumption
- Stunning is any process that causes a loss of consciousness and sensibility without causing pain
- Stunning includes any process that results in instant death
- Simple stunning is any stunning process which does not result in instantaneous death
- Simple stunning must be followed as quickly as possible by a procedure ensuring death occurs before the animal regains consciousness

It is worth noting that the word OV is not used in the regulation and it refers to Business Operators not Food Business Operators.

Some of the main changes affecting slaughterhouses will be:

1. The requirement for the Business Operator to appoint an Animal Welfare Officer (AWO) in all slaughterhouses, other than those producing less than 1,000 livestock units or 150,000 poultry per annum. The AWO should report directly to the Business Operator. They should assist the Business Operator meet the requirements of the Regulation, including the monitoring of welfare, and must keep a record of measures taken to improve welfare. The AWO must have a Certificate of Competence in all species and operations that they supervise.

2. A requirement for all Business Operators to have in place Standard Operating Procedures (SOPs). (Please see the article on SOPs in this issue for further details)

3. A requirement to produce Guides to Good Practice. These are currently in production by the British Meat Processors Association and the British Poultry Council and will be published on the internet. It is expected that they will include guidance on SOP format and content.

4. The requirement for anyone responsible for the handling and care of animals before they are restrained, through to slaughter, to have a Certificate of Competence (CoC). The final details of the CoC process remain to be confirmed in England and Wales but in Scotland it is anticipated that all workers in slaughterhouses handling



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animals from arrival in the lairage to slaughter will have a CoC in some form on 1 January 2013. For any new starters after 1 January there is a requirement to enrol on an approved training course before applying for a Temporary CoC. This will only be valid for 3 months and will not normally be renewable.

5. There will be a number of new requirements and changes to the procedures permitted for simple stunning and stunning. Decapitation will no longer be permitted. Neck dislocation cannot be used other than as a back up and one person cannot complete more than 70 neck dislocations a day. For manual dislocation birds must be under 3Kg and for mechanical dislocation under 5 Kg. Specific electrical parameters are now laid down for head only and waterbath stunning.

During January 2013, Lead Vets will be delivering training for the Scotland region to both OV's and MHI's, and e-learning will be available. It is anticipated that there will be national implementing legislation in place for Scotland on 1 January, however, for England and Wales there is a delay and the current position is that we do not anticipate domestic regulations being in place until Summer 2013.

In the interim period for England and Wales, we have agreed with Defra and the Welsh Government that all OV's and MHI's will be authorised under the Animal Welfare Act 2006. This provides powers to enforce animal welfare; training will be provided on this by e-learning before the 1st January.

An update on the provisions of national implementing regulations will be provided when these are available.

Article by Collin Willson & Peregrine Pocock

Changes in the Processing of Over 72 month Cattle

On 15 October 2012 the European Food Safety Authority published a report on the "minimum sample size to test should an annual BSE statistical regime be authorised in healthy slaughtered cattle". After consideration, the Commission has recommended that the testing of healthy cattle should cease. This will occur when European legislation is amended to accommodate the change.

However, testing of at risk animals, (cattle showing clinical signs of possible BSE, cattle identified as sick at ante-mortem, animals slaughtered as an emergency on the farm) and all animals from Third Countries (aged over thirty months if healthy at slaughter or aged over 24 months if identified as sick at ante-mortem) will continue. Testing procedures for these animals will remain unchanged. All existing SRM controls will remain unchanged.



In the next few weeks, the recommendation will be discussed further at the European Standing Committee on the Food Chain and Animal Health section, and subsequently implemented by the competent authorities in England, Scotland, Wales and Northern Ireland.

The exact implementation detail has yet to be determined, however, full operational instructions will be issued prior to introduction of the changes.

You will receive confirmation of changes to the BSE testing regime as soon as the detail is determined. Until then, **BSE testing of cattle will remain unchanged.**

To view a copy of the EFSA report please visit www.efsa.europa.eu/en/efsajournal/pub/2913.htm

Article by John Sterry

Animal Welfare - Standard Operating Procedures

Regulation EC 1099/2009 (PATOK) Article 6 requires that all business operators have in place a written Standard Operating Procedure (SOP). This includes killing outside of a slaughterhouse, including livestock holdings.

Article 6 of 1099/2009 (PATOK) requirements are as follows:

1. Business operators shall plan in advance the killing of animals and related operations and carry them out in accordance with standard operating procedures.
2. Business operators shall draw up and implement SOP's to ensure that killing and related operations are carried out in accordance with Article 3(1).

Article 3.(1) states: "Animals shall be spared any avoidable pain, distress or suffering during their killing and related operations."

As regards stunning, the SOP's shall:

- a. take into account manufacturers' recommendations;
 - b. define for each stunning method used, on the basis of available scientific evidence, the key parameters in Chapter I of Annex I ensuring their effectiveness to stun the animals;
 - c. specify the measures to be taken when the checks referred to in Article 5 indicate that an animal is not properly stunned or, in the case of animals slaughtered in accordance with Article 4(4), that the animal still presents signs of life.
3. For the purpose of paragraph 2 of this Article, a business operator may use standard operating procedures as described in the guides to good practice referred to in Article 13.
 4. Business operators shall make available to the competent authority their standard operating procedures upon request.

SOPs are central to the less prescriptive, outcome focussed approach introduced by Regulation 1099/2009. They must ensure all the relevant legislative requirements are met and the overarching welfare objectives are achieved.

A major reason for SOPs is the requirement to define key parameters for each stunning method used and the actions to be taken when checks on those parameters show ineffective stunning. The key parameters for each stunning method are identified in Annex 1 to Regulation 1099/2009. Key parameters must reflect current scientific evidence and the manufacturers' recommendations.

Scientific evidence will change over time and new equipment may be installed or changes made to existing equipment; therefore it is important to ensure that SOPs are reviewed regularly. Equipment manufacturers must include key parameters in the instructions they provide with new restraining and stunning equipment and the FBO should refer to these instructions when preparing SOPs.

Planning killing operations in advance is essential to ensure the welfare of animals is protected effectively. SOPs are intended to achieve this and all persons must ensure an SOP is in place before killing commences.

Enforcement action may be taken where the Competent Authority considers an SOP will not achieve the required welfare outcomes. This can include a requirement to amend the SOP and slow down or stop production. Enforcement protocols will be confirmed once domestic implementing regulations are in place.

It is anticipated that guidance on the preparation of SOP's will be provided in the Redmeat Guide to Good Practice to be published by the British Meat Processors Association, and the Whitemeat Guide to Good Practice to be published by the British Poultry Council.

Article by Collin Willson

Sampling of horses for phenylbutazone

The use of phenylbutazone at any point of the animal's life is not permitted in horses intended for human consumption.

Between 16 July and 14 September, the FSA carried out increased testing for residues of phenylbutazone, in order to establish whether horses presented for slaughter at approved equine slaughterhouses are being treated with this medicine. This was in addition to the National Surveillance programme carried out by the Veterinary Medicines Directorate (VMD).

The survey required the collection of randomly selected kidney samples from horses sent for slaughter. The samples were tested for phenylbutazone at the Food & Environment Research Agency (FERA). Samples were collected from 5% of the total throughput of horses sent for slaughter during the surveillance period. In total, of the 1424 horses slaughtered, 63 were sampled; of these, four samples (6% of the samples tested) were found to be non-compliant as traces of this medicine were detected.

All four samples found to be non-compliant have been reported to the Food Incidents Branch for investigation.

Action taken was as follows; one carcase was

disposed of as Category 1 material, two UK Local Authorities were notified of carcasses that were sent to establishments within their area to enable follow up and two Rapid Alert System for Food & Feed (RASFF) were sent to the EC to inform the authorities of distribution of non-compliant carcasses.

Analysis has taken place to assess the impact of the results. These compare negatively with previous sampling on behalf of the VMD.

In 2011, VMD selected 60 kidney out of a total of 7563 horse slaughtered for human consumption, and tested them for traces of phenylbutazone. One sample was found to be Non-compliant.

To date in 2012, 82 kidney samples out of a total of 5543 horses slaughtered have been sampled and tested by VMD for traces of phenylbutazone. Four samples tested as non-compliant. Of the samples taken this year (both by VMD and additional FSA surveillance) there have been 8 positives out of 145 samples.

Due to the small sample numbers, it is difficult to be precise but statistical analysis suggests that approximately 4-5% of horses are non-compliant for phenylbutazone. The FSA is now considering whether to extend the increased surveillance programme; slaughterhouse FBOs and FSA staff will be advised accordingly if this is the case.

Article by Jose Gomez-Luengo

National Equine Database shut down

Following the withdrawal of the online National Equine Database (NED), we have been advised that if you have any issues or questions on Horse Passports that cannot be answered by the Horse Passport Issuing (PIO) authority then please contact Defra for guidance using the following number:

08459 33 55 77 (and ask for the Horse Passport Team).

Also in the past, foreign horse passports were returned to NED but now if you receive horses with foreign passports the passports are to be returned to Defra at the following address:

Mike Weavers
Equine ID Team
Defra, Area 5E
Millbank
Nobel House
17 Smith Square
London
SW1P 3JR

Defra have advised that consultation has been set up with the Equine Sector to jointly set up a database for the recording of Equine data to replace the NED system and we will advise when we have further information.

The shutdown of the NED system means that there is now no need to record horse passport information on this system (you should not be able to enter data now).

Please continue to complete and return the daily/ weekly horse passport spreadsheets to the SLA Unit using the following address

slaunit@foodstandards.gov.uk

Article by James Leadbeater

Permanent procedures based on HACCP principles

Principle 3: Establishing critical limits at critical control points.

The third of the 7 HACCP principles is described in the Hygiene Regulations as the establishment of critical limits at critical control points (CCPs) which separate acceptability from unacceptability for the prevention, elimination or reduction of identified hazards.

In previous articles we have identified the relevant hazards and established the CCPs in the process in order to control those hazards. Now we need to look at setting the critical limits at those CCPs.

A critical limit is the highest or lowest value that is acceptable for product safety, beyond which, control is lost (e.g. a determined temperature value or a specific period of time). Critical limits separate safe from unsafe food and acceptability from unacceptability at a specific CCP.

Critical limits must be at least as strict as any legal limits that apply at that process step.

In the previous article, the need to identify control points as required by the Hygiene Regulations was discussed. At least one 'legal' limit at each point would need to be decided where a control point is required by the Regulations.

Flexibility may also apply when critical limits are determined. It would not always be necessary to fix a numerical value that requires measurement. Such is the case at CCPs where monitoring procedures are based on visual observation. An example would be the presence or absence of visible (such as faecal) contamination of carcasses in a slaughterhouse.

It is important to use critical limits based on legislation or on evidence that will result in the production of safe food. The critical limits must be capable of being monitored by measurements (using calibrated equipment) or by observation (presence or absence) and so be clear to staff whether the process is under control or is moving out of control.

Staff responsible for monitoring the critical limits need to be able to identify quickly and clearly when a loss of control has taken place so that corrective action can be taken in a timely and efficient manner.

Examples of critical limits include time/temperature combinations, pH values, moisture content, additive, preservative or salt level, and sensory parameters such as visual appearance (e.g. presence or absence of visible faecal or other contamination).

It is also recognised that having stricter 'target levels', which would give early warning signals before the breach of a critical limit occurs, can be useful. These early warning signals may indicate a potential loss of control before it becomes too late to rectify and it will allow the process to be returned to a controlled status.

The common problems found when establishing critical limits are:

- The critical limits are inappropriate; for instance they do not relate to the hazard to be controlled (e.g. hazard being the presence of a physical contaminant and the critical limit being the absence/presence of identification mark on the packaging).
- They do not separate safe from unsafe food. (e.g. the critical limit being the right commercial code or colour on labels).
- The set limits are difficult to measure or to observe during normal working conditions. (e.g. the critical limit being that the internal temperature of frozen product is always below -18°C before despatch).

Article by Jose Camara-Diaz

Trial of visual inspection of fattening pigs from non-controlled housing conditions

Between November 2011 and March 2012 a field trial and risk assessment of visual only inspection of outdoor reared pigs took place at an establishment in Lincolnshire.

The study, organized by the FSA's Strategy Unit in The Hygiene and Microbiology Division, was carried out by the Scotland's Rural College (SRUC) and the results will be presented to the European Commission as part of the review of current inspection methods.

Under Regulation EC 854/2004, visual inspection of fattening pigs housed under controlled housing conditions since weaning may be allowed by the competent authority. The aim of this project was to determine the implications for public health, animal health and animal welfare associated with visual only inspection as opposed to 'traditional' inspection of "outdoor" pigs, reared under non-controlled housing conditions.

11,000 pigs were inspected visually only without any palpation or incision and the findings compared to those conditions found by regulatory inspection carried out further along the line. In addition, up to 800 samples were taken after visual only and after the 'traditional' inspection in order to assess the microbiological effect that a reduced handling of the carcasses may have to the overall hygiene of the process.

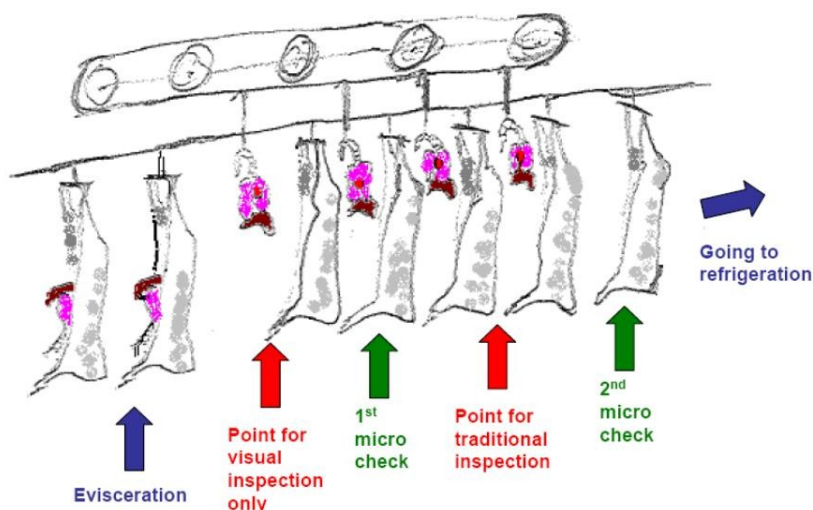


Figure 1 Position of the Visual and Traditional Inspection and microbiological sampling points

Further details of the study conclusions will be published in early 2013. Preliminary results have shown that there are statistically significant differences on the detection of up to six conditions (including endocarditis and granulomatous lesions) although the biological differences are very small and the risk of carrying out visual only inspection on outdoor pigs is considered negligible.

Statistically significant differences were found too on the levels of hygiene indicators such as Enterobacteriaceae with higher contamination levels found after the 'traditional' inspection. It was reassuring that no Salmonella positives were found.

The results are in line with a previous qualitative risk assessment and the EFSA opinion published in October 2011 in relation to the modernisation of pig meat inspection.

Further information about the Strategy Unit's programme of research for the modernisation of meat inspection can be found at www.food.gov.uk/enforcement/monitoring/mhservice/reviewofmeatcontrols/

The qualitative risk assessment can be found at www.food.gov.uk/science/research/choiceandstandardsresearch/meatcontrolsprojects/mc1002/

The EFSA scientific opinion and technical report related to swine can be found at www.efsa.europa.eu/en/efsajournal/pub/2351.htm and www.efsa.europa.eu/en/efsajournal/pub/2371.htm

Finally, it is recognised that the study could not have succeeded without the assistance from the OV, the MHI's and the invaluable work by the SDM.

Article by Inaki Deza-Cruz

We hope you enjoyed issue 80 of Tec Files. An electronic version is also available on FoodWeb under the 'News' section <http://foodweb/news/tecfiles/Pages/default.aspx>. We welcome all feedback, so if you have any comments, or suggestions for articles that you would like to see featured in future editions, please email: vettec.editorial@foodstandards.gov.uk