

019

Safe pork or safer pork? What has been changed and is to be changed in the EU hygiene legislation?

Ernst E.¹

¹Ministry for Rural Affairs and Consumer Protection of the State Baden-Wuerttemberg, Head of the Unit Food from Animal Origin, Meat and Poultry Meat Hygiene, Stuttgart, Germany

Since the adoption of the “hygiene package” in 2004 by the legal bodies of EU several modification and changes of the EU hygiene legislation has taken place or will enter into force as from 14th December 2019 (Control Regulation (EU) 2017/625 and Delegated Acts and Implementing Regulation according Art. 18). The key elements to produce safe pork subsequent to the primary production are the legal arrangements for the information exchange between farmer and slaughterhouse and official vet (food chain information and reports of the official veterinarian), (risk based) meat inspection, GHP and HACCP-based procedures, microbiological criteria and residue controls. As a member of the Commission working group on the hygiene legislation, the author likes to give an overview about the last and actual changes in hygiene legislation in relation to safe pork.

In 2009 the European Commission and the Member States (MS) and asked the European Food Safety Authority (EFSA) to give a scientific opinion to modernise meat inspection. Based on the recommendations Commission developed and adopted together with the MS several, more risk-based approaches to modify the legal requirements for meat inspection and meat production in domestic swine:

- introduction of the meat inspection method “visual only” as standard method in 2014 for domestic swine to reduce the cross contamination risk for zoonotic agents during the slaughter process
- modification of the process hygiene criteria (PHC) “Salmonella” from maximum 5 to 3 positive tested carcasses within the moving window of 50 tested carcasses within 10 weeks from 2015
- report of the results from the MS/competent authorities about the own controls results according Regulation (EC) No 2073/2005 (PHC) in relation to Salmonella beginning from the year 2015
- possibility to omit trichinella testing in 2015 under controlled housing conditions for domestic swine

In the course of merging of the Regulations (EC) No 882/2004 and 854/2004 to Regulation (EU) 2017/625 on

official controls Commission was authorised to adopt delegated and implementing acts according Art.18 (7) und (8). The procedures on official controls in the field of meat productions had to be revised.

These new EU regulations on official controls to replace Regulation (EC) No 854/2004 will come into force from 14th of December 2019. The delegated and implementing acts were published in the Official Journal of the European Union (OJ) on 17th of May 2019 as Regulation (EU) 2019/624 and Regulation (EU) 2019/627. Major issues are:

- definition of small slaughterhouses as facilities with a slaughter throughput of less than 1.000 large cattle units per year and some derogations for them (meat inspection by official auxiliary)
- possibility to perform ante mortem inspection for all species at the holding of provenance
- “visual only” as standard meat inspection method for young bovines and lambs, other examination methods only risk based
- ante mortem inspection can be done by official auxiliary under the supervision of an official vet in slaughter houses when the animals alive show no abnormalities.
- relevant findings in meat inspection (human and animal health, animal welfare) are to be reported always to the competent authority responsible for supervising the holding of provenance
- more detailed specifications on auditing fresh meat establishments and measures in cases of noncompliance for official veterinarians and competent authorities
- emergency slaughter needs an official veterinarian for ante mortem inspection, other veterinarian are no longer allowed
- reduction of the theoretic training for official auxiliaries
- some other derogation for the official controls for the production of small amounts of meat (farmed game, reindeers, grouse)

The prominent aims of the last changes and revised versions of the EU hygiene legislation are in the first line more flexibility for small establishments and more efficiency and effectivity in official controls. The changes in 2014/2015 addressed particularly the salmonella risk in pork.

According the framework and responsibilities of the “hygiene package” from 2004, the involved food business operators have to put systems in place in such a way that relevant information to ensure food safety are available. These last changes supports these objectives of the hygiene package. On the other hand, the concrete requirements remains very

diffuse. For small establishment this might reduce the “bureaucratic burden”. However, it does not help to implement effective systems on food safety.

At several places in the EU hygiene legislation is the talk about “relevant information.” What are those “relevant information”?

Up to now, more than 99% of food chain information from farmers to slaughter houses in Germany are delivered using the standard form of Annex 7 of the German regulation for food from animal origin and testifying that there are no relevant information. There is no guidance document in Germany available, which tries to define “relevant information” according Annex II Section III of Regulation (EC) No 853/2004 for animals for slaughter.

For the producers of meat products with the need to use pork with low or risk profile according their processing methods there is no legal development towards a more specific or effective risk management of the meat industry. It is up its own risk management to deal with biological risk like Yersinia, Toxoplasma, Hepatitis-E-virus or Campylobacter.

In addition, it remains almost unclear what competent authorities can claim from the meat industry to fulfil the requirements of HACCP based procedures for RTE meat products without heat treatment.

Therefore, it is up to the retailer and other customers of the meat industry to demand safe pork and safe meat products. Or, let us say “safer pork”?