



ERPA position on the Official Controls Regulation: presence of official veterinarians in poultry slaughterhouses

Regulatory context

Drafting of delegated and implementing acts on the presence of official veterinarians in slaughterhouses, by the European Commission, pursuant to Article 18(7) of Regulation (EU) 2017/625 of the European Parliament and of the Council of 15th March 2017 on official controls.

Characteristics of rural poultry in Europe

Very varied types of farming, producers, and therefore markets, with:

- live birds (including day old chicks, 4/6 weeks old poultry)
- traditional poultry, « traditional free range », sold as dressed poultry, either by independents (sometimes with a small slaughterhouse), or by organized poultry sector with quality signs (Organic farming, PGI, PDO, Label Rouge in France).

Many similarities corresponding to the criteria associated with "traditional poultry":

- colored birds from rustic slow-growing strains
- extensive free range method, with limited densities
- flocks and farms with limited size
- familial farming and capital
- quality products (taste).

Significant production volumes: out of 7 ERPA member countries (France, Italy, Portugal, Spain, Hungary, Greece and Belgium), the volumes produced represent more than 400 million colored chickens per year.

Targeted markets: sales by independents are made in local shops, at markets or directly from the farm, while sales by the organized sector are carried out in these local shops but also in supermarkets.

Production characteristics:

The existence in Europe of small and medium slaughterhouses is very different depending on the country, and it is difficult to have precise data on each country.

France has the largest number of small and medium slaughterhouses in Europe, with a total of 700 recognized poultry slaughterhouses; 8% of them slaughter more than 10 000 tons a year and represent 80% of the national production; all the others are small and medium-sized slaughterhouses.

In Wallonia/Belgium, 60% of small slaughterhouses disappeared in less than 10 years. There are barely two left today, one of which will stop operating in June 2018.

In Spain, while the regulations currently prohibit to have slaughterhouses on the farm, the administration is ready to publish regulations authorizing them, in order to help the development of the rural poultry production. But the mandatory presence of official veterinarians will prevent the creation of small slaughterhouses.

Why is the daily presence of official veterinarians in slaughterhouses an economic issue for rural poultry in Europe?

To promote and help the development of rural poultry, farmers **need slaughterhouses on the production sites or local slaughterhouses**. This is important for guaranteeing to consumers that the **poultry are locally produced**, in a context of strong demands for local products. This also **limits the transport duration, in order to respect animal welfare**. Moreover, some specifications demand a very limited duration/distance of transport between the farms and the slaughterhouse (example in Label Rouge in France: the distance between the farm and the slaughterhouse must be limited to 100 km/3h maximum).

Therefore, the production of rural poultry in Europe needs, to exist, small or medium-sized abattoirs spread throughout the territory.

Nevertheless, the permanent presence of official veterinarians in slaughterhouses is **a very important obstacle to the development of these small and medium slaughterhouses**, because that entails costs that do not make it possible for them to ensure a profitability. For example in Belgium: for slaughtering 300 poultry a day, half of the price charged to the customer is related to the presence of the veterinarian for the ante and post-mortem inspections.

Moreover, today we observe that in countries where the creation of small and medium slaughterhouses is impossible, illegal slaughtering is developing and sometimes reaching large volumes, without any supervision on hygiene, animal welfare or working conditions. We fear that this phenomenon will increase, with the demand made by consumers for more and more local products or direct selling. To avoid this, we ask for **flexibility regarding the daily presence of official veterinarians in slaughterhouses**, in order to favor the emergence of small and medium slaughterhouses.

Propositions

ERPA considers, according to the experience of its members in different states, that it is possible to guarantee an irreproachable sanitary quality of the poultry, while having a certain flexibility regarding the daily presence of official veterinarians in slaughterhouses, but under certain conditions.

- 1) ERPA ask the European Commission to modify 2 sentences in the implementing and delegated acts on official controls in slaughterhouses, **in accordance with the Article 18(3)** of the Regulation (EU) 2017/625, as follows:

In the implementing acts:

Article 17 - Practical arrangements for post-mortem inspection of poultry

2. The official veterinarian or official auxiliary, in accordance with Article 18(2)(c) of that Regulation shall carry out ~~personally~~ the following checks, which might include the involvement of slaughterhouse staff:

(a) ~~daily~~ inspection, whose frequency is based on a risk analysis, of the viscera and body cavities of a representative sample of each poultry flock, as defined in Article 2(3)(b) of Regulation (EC) N°2160/2003; [...]

In the delegated acts:

Article 6 – Criteria and conditions for the performance of post-mortem inspections and auditing activities under the responsibility of the official veterinarian, as provided for in Article 18(7)(e) and (i) of Regulation (EU) 2017/625

(1) (d) the presence of the official veterinarian is present in the establishment is based on a risk analysis at least once a day during or after the slaughter activities;

- 2) Moreover, ERPA asks the European Commission to introduce more flexibility for low capacity slaughterhouses in the delegated acts:

➤ **Allow the involvement of trained slaughterhouse staff under the responsibility of the official veterinarian, for ante and post-mortem inspections.**

Visual batches inspection can be ensured by the slaughterhouse staff who have received appropriate training, since the monitoring along the slaughter line makes it possible to detect animals which need to be removed from the food chain.

➤ Conditions to respect (at least):

- Establishment and transmission of a report by the slaughterhouse to the official veterinarian in case of abnormalities observed during slaughter;
- Unannounced inspections carried out on-site by the official veterinarian, based on a risk analysis;
- Mandatory training of the staff responsible of ante and post-mortem inspection tasks.
- Monitoring of a certain number of microbiological analyzes per year, on carcasses and cuts, by the slaughterhouse.

ERPA, European rural poultry association, was created in May 2007 to:

- *Defend, support and develop the production of rural poultry* in the European Union*
- *Defend the extensive and family methods of rearing, including free range poultry rearing*
- *Implement any action to encourage the production and sale of rural poultry and take into account their specific characteristics in European regulations in agricultural, economic and health, and the CAP.*

ERPA members are organizations representing producers of rural poultry in Europe, and associate members are selectors of breeds intended for the production of rural poultry.

** Rural poultry is highly diverse in nature and varies according to the country:*

- *Family poultry*
- *Young stock sold alive directly or at markets*
- *Poultry sold with national quality certification, under PGI or PDO, or reared organically*
- *Free range poultry produced by organized outlets, etc.*

All of these types of rural poultry are reared extensively in accordance with animal welfare and are from coloured rustic breeds with slow rates of growth. They concern two distinct sectors of production: poultry for meat and eggs.