

Thierry Chalus - EU Commission
Representatives of MSs at the Working Group
(via e-mail)

10 June 2009

Reference:

Dear Colleagues,

UK REQUEST IN RELATION TO LARGE FARMED GAME TO BE INCLUDED IN THE REFLECTION PAPER

Certification of slaughter and bleeding of game on farm.

Reg (EC) 853/2004 Ax.III, S.III 3(j).

During transport to the approved establishment, a certificate issued and signed by the OV or AV, attesting to a favourable result of the ante-mortem inspection, correct slaughter and bleeding and the date and time of slaughter, accompanies the slaughtered animals to the slaughterhouse.

Reg 2076/2005 Art 9

Until 31/12/09 this transitional measure allows the FBO to certify correct slaughter and bleeding and the date and time of slaughter. The AV need only certify the result of their ante-mortem inspection up to 3 days before slaughter.

Reg 854/2004Ax I S.IV Chapter X 4

A certificate conforming to the specimen in Chapter X, Part B, is to accompany animals inspected and slaughtered at the holding.



1. In the last Commission Working Group (25 May), the UK presented and explained the difficulties that the UK industry would face if measures equivalent to the provisions of the current transitional measure are not maintained beyond 31 December in relation to the issue of farmed game and the certification of slaughter and bleeding. The impact on industry had not become clear until relatively late in the negotiation of the hygiene package but was recognised in the transitional measures.

Transitional measure

2. A transitional measure in Regulation (EC) 2076/2005 means that, having inspected a group of animals in the field, the Approved / Official Veterinarian does not have to be present later when they are shot and bled and is not required to certify correct slaughter and bleeding or the date and time of slaughter. Instead this is done by the FBO. The UK has provided a single model certificate to accompany bodies sent for dressing to the slaughterhouse, which provides for both certifications. The transitional measure ends on 31 December 2009.

Animal Welfare

3. A UK review of the slaughter of animals from the point of view of welfare concluded that the field slaughter of farmed deer by rifle while they feed quietly is the most humane means of slaughter currently being applied to any UK livestock. Transport of live deer to slaughter is not desirable from a welfare perspective. There are no welfare issues in bleeding dead animals.

Impact on industry

4. The industry's concern is that the high additional cost of requiring a veterinarian to come to a farm to attest to correct slaughter and bleeding and the date and time of slaughter added to the cost of the earlier ante-mortem inspection will make the business uneconomic. Information provided by the industry association indicates that approximately 10,000 farmed deer are slaughtered annually. The cost of

veterinary attendance at slaughter is estimated to range from 85€-265€ (£90 to £270) per consignment depending on how long the process takes.

Request

5. The Commission had previously made clear its reluctance to extend the transitional measure regulation beyond the current deadline. The UK requests a continuation of the arrangement permitted by the transitional measure, i.e. allowing certification of correct slaughter and bleeding by the FBO and includes measures with similar effect, i.e. the hygienic and humane killing and bleeding. The UK request is to be allowed to continue with FBO certification of correct slaughter and bleeding through a change to Regulations 853/2004 and 854/2004.
6. The UK proposal includes the following measures:
 - the certification of the person carrying out the shooting and bleeding
 - verification checks by the Approved Veterinarian (AV) / Official Veterinarian (OV) of the performance of the person carrying out the shooting and bleeding.

Requirements for other animals

7. The above controls will be in line with current requirements for large wild game (hunter's declaration) and the slaughter of domestic species in approved slaughterhouses where the OV verifies the competency of the slaughterer but the bleeding of every animal cannot be observed.

Proposed welfare at slaughter legislation

8. The Commission's proposed regulation on the welfare of animals at slaughter would require the licensing of all slaughterers (a current UK practice). With this in mind, licensing could be extended to the marksmen who shoot and bleed farmed game. This would strengthen the present position, allowed by the transitional measure, as well as bringing the hygiene and welfare legislation in line with each other and we consider that this is another factor to provide the basis for the

change that the UK is seeking. It might also address an issue raised by others, that farmed deer shot with a free bullet should be considered as wild game, a practice the Commission did not condone.

9. We understand that the welfare proposal is expected to be adopted in principle at the Council meeting on 22/23 June, with final ratification taken as an A point at a Council in the autumn. If endorsed, it could come into effect on 1 January 2011.

Certificates

10. The requirement for certification is included in Regulation (EC) 853/2004. It is noted however that the requirement for a veterinary certificate (B) is also included at Annex I Section IV Chapter X of Regulation 854/2004.
11. Proposed changes to Regulations 853/2004 and 854/2004 are set out below. They include a suggestion that 853/2004 Annex III Section III should apply to any species that is farmed but is, for all practical purposes, wild.
12. We present this proposal to be included in a further version of the reflections' paper. A note on the UK position, including proposed changes to the texts, is attached. I hope this is helpful.

Yours sincerely

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Deputy Veterinary Director

PROPOSED CHANGES TO REG 853/2004 and 854/2004

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2004:139:0055:0205:EN:PDF>

(page 73 -74)

Reg (EC) 853/2004 Ax.III, S.III Point 3:

SECTION III: MEAT OF FARMED GAME

1. The provisions of Section I apply to the production and placing on the market of meat from even-toed farmed game mammals (Cervidae and Suidae), unless the competent authority considers them inappropriate.
2. The provisions of Section II apply to the production and placing on the market of meat from raptorial birds. However, those of Section I apply where the competent authority considers them appropriate. Appropriate facilities must be provided, adapted to the size of the animals.
3. Notwithstanding points 1 and 2, food business operators may slaughter farmed raptorial birds and farmed ungulates referred to in point 1 at the place of origin with the authorisation of the competent authority if:
 - (a) the animals cannot be transported, to avoid any risk for the handler or to protect the welfare of the animals;
 - (b) the herd undergoes regular veterinary inspection;
 - (c) the owner of the animals submits a request;
 - (d) the competent authority is informed in advance of the date and time of slaughter of the animals;
 - (e) the holding has procedures for concentrating the animals to allow an ante-mortem inspection of the group to be made;

(f) the holding has facilities suitable for the slaughter, bleeding and, where ratites are to be plucked, plucking of the animals;

(g) animal welfare requirements are complied with, **and slaughter or killing is only carried out by a competent, certified person.**

(h) slaughtered and bled animals are transported to the slaughterhouse hygienically and without undue delay. If transport takes more than two hours, the animals are, if necessary, refrigerated. Evisceration may take place on the spot, under the supervision of the veterinarian;

(i) a declaration signed by the food business operator who reared the animals, stating their identity and indicating any veterinary products or other treatments administered, dates of administration and withdrawal periods, and **attesting to correct slaughter and bleeding and the date and time of slaughter**, accompanies the slaughtered animals to the slaughterhouse; and

(j) during transport to the approved establishment, a certificate issued and signed by the official veterinarian or approved veterinarian, attesting to a favourable result of the ante-mortem inspection, ~~**correct slaughter and bleeding and the date and time of slaughter**~~, accompanies the slaughtered animals.

4. Food business operators may, **with competent authority approval**, also slaughter bison **and other species** on the farm in accordance with paragraph 3, in exceptional circumstances.

<http://eur->

lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2004:139:0206:0320:EN:PDF

Reg 854/2004 Annex I Section IV Chapter X 4

A certificate conforming to the specimen in Chapter X, Part B, is to accompany animals inspected and slaughtered at the holding, **except that the declaration need not include observation of slaughter and bleeding.**

5. Declaration

I, the undersigned, declare that:

– the animals described above were examined before slaughter at the above-mentioned

holding at (time) on (date) and were found to be healthy,

– **they were slaughtered at the holding at (time) on (date) and slaughter and bleeding were carried out correctly,**

– the records and documentation concerning these animals satisfied the legal requirements and did not prohibit slaughter of the animals.