



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

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### *Regulatory context*

Drafting of delegated 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 15<sup>th</sup> 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.

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

To promote 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 impose 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.

This issue is crucial to help the development of rural poultry.

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.

Moreover, today we observe that in countries where the creation of small and medium slaughterhouses is impossible, illegal slaughtering is developing and sometimes this reaches 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 presence of official veterinarians in slaughterhouses**, in order to favor the emergence of small and medium slaughterhouses.

### *ERPA 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 presence of official veterinarians in slaughterhouses, but under certain conditions.

ERPA asks the European Commission to introduce a flexibility for poultry slaughterhouses in the delegated acts on official controls in slaughterhouses, with the following elements:

- **No obligation that official veterinarian carries out ante and post-mortem inspections in poultry slaughterhouses.** This is also true for official auxiliaries under supervision/responsibility of the official veterinarian (thus requiring the daily presence of the official veterinarian);
- **Performing ante and post-mortem inspections by slaughterhouse trained staff, under the responsibility of the official veterinarian.** It is easier indeed to control the state of a poultry if the operator is directly in contact with it.

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.

Checks required:

- Inspection of the ICA form by the slaughterhouse manager, to detect batches that have had problems during breeding or have not respected the waiting times of certain veterinary drugs. The ICA form sent by the farm to the slaughterhouse constitutes an essential document enabling to evaluate in advance the state of the lot to be slaughtered. It permits to take additional measures of control during the hanging, and all along the slaughter line, if risks are assessed concerning the sanitary condition of the batch;
- Examination of poultry before hanging, to detect febrile, breathless or stressed animals, or with respiratory signs;
- Identification of poultry that are abnormally thin or malformed during hanging and bleeding;

- Examination of carcasses and viscera, at the evisceration stage, to identify abnormalities defined by regulation (aerosaculitis, stained livers or with an abnormal color/consistency ...);
  - Identification of hematomas or abscesses throughout slaughter and cutting operations.
- Conditions to respect to obtain this flexibility:
- Establishment and transmission of a report by the slaughterhouse to the official veterinarian in case of problems observed during slaughter;
  - Performing unannounced inspections on-site by the official veterinarian, based on a risk analysis;
  - Mandatory training of the staff responsible of ante and post-mortem inspection tasks (number of days of training and program to be defined). If necessary, advanced training of a manager per slaughterhouse.
  - Possibly: definition of a minimum number of personnel responsible for inspection tasks, depending on the volume of poultry slaughtered;
  - Programming and monitoring of a certain number of microbiological analyzes per year, on carcasses and cuts, by the slaughterhouse.

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*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.*