

USE OF PLANT STAFF TO ASSIST WITH OFFICIAL CONTROLS IN POULTRY SLAUGHTERHOUSES

Executive Summary

1. At the March FSA Open Board meeting, during discussions on the EU Food Hygiene Regulations, a decision as to whether the UK should allow the continued use of plant inspection assistants (PIAs) in poultry slaughterhouses was referred to the MHS Board for consideration (Paper FSA 05/03/03, refers).
2. This paper reports the outcome of the MHS Board's consideration and informs the FSA Board on transitional measures proposed by the European Commission.

Board Action

3. The Board is asked to:
 - **note** the outcome of the referral to the MHS Board;
 - **note** the Commission's proposed transitional measures for the use of slaughterhouse staff assisting with official controls;
 - **note** the FSA's intention to allow slaughterhouse staff to assist with official controls, where they have been trained for the specific tasks they are to carry out.

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USE OF PLANT STAFF TO ASSIST WITH OFFICIAL CONTROLS IN POULTRY SLAUGHTERHOUSES

Purpose

1. To update the FSA Board on outstanding issues concerning the use of plant staff to assist with official controls in poultry slaughterhouses.

Background

2. The use of plant staff to assist with official controls in certain slaughterhouses was discussed at the March FSA Open Board meeting (Paper FSA 05/03/03). At that meeting Board members asked the MHS Board to consider the practicalities and to report back (paragraphs 15 and 16 of that paper refer).

The MHS Board's considerations

3. On the basis that there was no evidence to indicate that there would be any change in risk to the consumer, the MHS Board recommended that current practice should continue (Paper FSA 05/03/03, paragraph 15 refers).
4. With regard to the training requirements under the new regulations it was made clear to the MHS Board that the Commission considered further clarification of the text of the Regulation to be necessary (see paragraph 5, below). It was therefore unclear at that time whether full or partial training of plant staff was a requirement of the new regulations. The MHS Board recognised that whatever the outcome of the Commission's deliberations it was likely that the existing system of training would be strengthened by the introduction of formal training and external assessment (Paper FSA 05/03/03, paragraph 16 refers).

Transitional measures

5. The Commission has now proposed transitional measures requiring the competent authority to guarantee that slaughterhouse staff assisting with official controls shall, as a minimum requirement, be trained in the same way as official

assistants for the specific tasks that the slaughterhouse staff are asked to perform. The transitional measures apply until 31/12/2009 to allow Member States time to put in place additional training for the areas of work that plant staff are not currently engaged in.

6. The transitional measures are to be voted on at SCoFCAH¹ at their July meeting, although it is expected that they will go through as currently drafted.

Changes to UK meat inspector training arrangements

7. A modular meat inspection training course, updating the present course, is being developed in the UK. It will incorporate the requirements of the new Regulations. This would allow PIAs to be trained and tested in the same way as official meat inspectors for the specific duties that they undertake. PIAs only assisting with *post mortem* inspection would be required to complete two modules of this course successfully, which would require 80 hours of training.

Future arrangements

8. In view of the opinion of the MHS Board and the clarification of the training requirements for plant staff contained in the Commission's transitional arrangements, the FSA intends to allow plants wishing to use PIAs after 1st January 2006 to do so if:
 - they meet the appropriate criteria (see paragraph 3 of the attached Annex);
 - any new PIAs pass the external assessment for the appropriate training modules of the new meat inspection training course, once courses are available; and
 - existing PIAs pass the external assessment for the tasks they perform by the end of the transitional period.
9. Regulation 854/2004 requires the OV to carry out regular performance tests on the work of the PIAs.
10. At the end of the transitional period the requirements will revert to those set out in Chapter IIIA of Section III, Annex I of the Regulation.

¹ Standing Committee on the Food Chain and Animal Health

Board Action

11. The Board is asked to:

- **note** the outcome of the referral to the MHS Board;
- **note** the Commission's proposed transitional measures for the use of slaughterhouse staff assisting with official controls;
- **note** the FSA's intention to allow slaughterhouse staff to assist with official controls, where they have been trained for the specific tasks they are to carry out.

REQUIREMENTS OF REGULATION (EC) 854/2004 ON THE USE OF PLANT STAFF IN POULTRY SLAUGHTERHOUSES

The requirements of the legislation

1. Article 5(6) of Regulation (EC) 854/2004 permits Member States to allow plant staff in poultry and lagomorph slaughterhouses to assist with official controls, under the full time supervision of the official veterinarian, in accordance with detailed conditions.
2. In essence, the new Regulation allows plant staff either to assist the official veterinarian with *post mortem* inspection only, as at present, or to carry out any of the other duties of an official meat inspector.
3. PIA tasks might include:
 - in relation to auditing tasks: collecting information regarding good hygienic practices and HACCP-based procedures;
 - in relation to *ante mortem* inspection and checks concerning the welfare of animals: making an initial check of animals and helping with purely practical tasks;
 - carrying out a welfare check at the slaughterhouse where *ante mortem* has been carried out on the farm by an OV or an approved veterinarian;
 - carrying out *post mortem* inspection; and
 - carrying out specific sampling and testing tasks.
4. Plants wishing to use PIAs must satisfy the competent authority (the FSA) that they have used good hygiene practice and HACCP based procedures for at least 12 months.
5. The Regulation also states that they must possess internationally recognised certification. There is no such certification at present and the Commission are introducing a transitional arrangement for requirements to be laid down before by 31/12/2009. Until such time no certificate can be required.

6. The Regulation requires plant staff undertaking the activities or duties of the official auxiliary to be authorised. To be authorised, PIAs must:
 - be trained in the same way as an official assistant; and
 - have passed the same test as the official auxiliaries to carry out those tasks; and
 - form part of the competent authority's inspection team.

7. The Regulation only allows PIAs to operate under the direct supervision of the OV, requires them to report any deficiencies to the OV and be subject to performance tests.

8. The Regulation also states that responsibilities for production and inspection in the establishment must be kept separate. The OV would therefore carry out regular checks to verify this. This would include verifying that PIAs do not carry out commercial production activities while under the OV's supervision. The objective here is to ensure that PIAs do not carry out any activity that could cause a conflict of interest with their PIA role.

9. The OV would be required to recommend to the competent authority that the authorisation of individual PIA(s) should be withdrawn, or that the PIA system is withdrawn in a particular slaughterhouse, if the results of the OV checks show that:
 - the level of hygiene at the establishment is affected by the work of the PIAs;
 - PIAs do not carry out the tasks properly;
 - the work of the PIA is generally carried out in an unsatisfactory manner; or
 - the criteria for the use of PIAs are no longer being met.