Terrestrial Animal Health Standards Commission Report - February 2017

USA Comments

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CHAPTER 6.1.

THE ROLE OF VETERINARY SERVICES IN FOOD SAFETY SYSTEMS

Article 6.1.1.

Introduction

Veterinarians are trained in both animal health (including zoonoses) and food safety, which makes them uniquely equipped to play a central role in ensuring food safety, especially the safety of food of animal origin. Close cooperation and effective communication between all relevant professionals, including veterinarians, other relevant professionals and stakeholders, is critical for the effective operation of the food safety system.

Rationale: replace the word “actors” with the word “relevant professionals” to improve readability, because the word “actor” is not clear.

The global, regional, national and local implications of food safety systems, especially in relation to the globalisation of the food supply, demands a high level of engagement and collaboration between Competent Authorities responsible for animal health, food safety and public health, in line with the One Health approach. This provides a wider role and greater responsibilities for Veterinary Services.

Food safety activities performed by Veterinary Services should be integrated to the greatest extent possible with the activities of all other responsible public agencies throughout the food chain.

Article 6.1.2.

Purpose and scope

The purpose of this chapter is to provide guidance to Member Countries on the role and responsibilities of Veterinary Services in food safety systems.

This chapter should be read in conjunction with Chapter 4.1., Chapter 4.2., and relevant chapters of Sections 6 and 7.

This chapter should also be read in conjunction with the Codex Alimentarius Principles and Guidelines for National Food Control Systems (CAC/GL 82-2013), General Principles of Food Hygiene (CAC/RCP 1-1969), Code of Hygienic Practice for Meat (CAC/RCP 58-2005), Code of Practice on Good Animal Feeding (CAC/RCP 54-2004), and Guidelines for the Design and Implementation of National Regulatory Food Safety Assurance Programmes Associated with the Use of Veterinary Drugs in Food Producing Animals (CAC/GL 71-2009), and other relevant Codex texts.

Article 6.1.3.

Characteristics of a food safety system

1. Food chain approach

   Food safety is best assured by an integrated, multidisciplinary approach that considers the entire food chain. A food safety system should take into account the complexity of food production and the globalisation of the food supply, and should be risk-based. It should consider potential risks associated with each stage of the
food chain, i.e. primary production, transport, processing and distribution, and integrate risk management responses to such risks at the most appropriate points along the food chain. The application of traceability systems and sharing food chain information enhance the effectiveness of a food safety system. Everyone involved in the food chain, including food business operators, Veterinary Services and consumers, has a responsibility to ensure that food is safe.

2. **Risk-based food safety systems**

Risk-based food safety systems include measures based on good practices (such as good agricultural practice, good hygienic practice), hazard analysis and critical control points (HACCP) principles and risk assessment. The design and application of a risk-based food safety system depends on the availability of adequate scientific information and effective utilisation of the technical resources of food business operators and Competent Authorities. Monitoring food safety outcomes and reviewing control measures are essential to ensure the effective performance of a risk-based food safety system.

3. **Responsibilities of food business operators for food safety**

Food business operators, including feed producers, farmers, processors, wholesalers, distributors, importers, exporters and retailers, have primary responsibility for ensuring the safety of their products and should be able to demonstrate that they comply with relevant food safety regulatory requirements. Food business operators have a responsibility to inform the Competent Authority in their country of any non-compliance associated with their product and take action to manage the risk e.g. the withdrawal of the product.

4. **Responsibilities of the relevant Competent Authorities**

Competent Authorities are responsible for developing policies, legislation and regulations relevant to food safety. They should also take steps to communicate these within their country and with trading partners.

Competent Authorities should collaborate with other responsible agencies to ensure that roles and responsibilities for food safety systems, including foodborne disease outbreak response, are addressed in a coordinated manner.

The relevant Competent Authorities should verify that the control systems used by food business operators are appropriate, validated, and effective, and operated in such a way that the regulatory requirements are met. This can be achieved through activities such as inspection and audit. In the event of non-compliance, appropriate corrective actions and sanctions should be applied.

**Article 6.1.4.**

**The roles and responsibilities of Veterinary Services in a food safety system**

1. **Roles and responsibilities of Veterinary Services**

Veterinary Authorities or other Competent Authorities should provide an appropriate institutional environment to allow Veterinary Services to implement the necessary policies and standards, and ensure adequate resources for them to carry out their tasks in a sustainable manner. Veterinary Services should have a clear chain of command and respective roles and responsibilities should be clearly defined and well documented.

Veterinary Services should be fully involved in the design and implementation of a risk-based food safety system appropriate to their mandate and organisational structure at the national level. In the implementation of food safety systems for food of animal origin, Veterinary Services should retain responsibility for verification and audit and facilitate a flexible approach to operational activities.

Veterinary Services should retain overall responsibility for the delivery and performance of any activities that they delegate to third party providers.

Where relevant, Veterinary Services should contribute to other food safety related activities, such as investigations of foodborne disease outbreaks, food defense, disaster management, and identifying emerging risks. In addition, Veterinary Services should contribute to the development and management of coordinated surveillance and control programmes for foodborne pathogens of public health importance.
In order for Veterinary Services to make the best possible contribution to ensuring food safety, the education and training of veterinarians and veterinary paraprofessionals should include training in food safety systems and ongoing professional development.

2. Activities of Veterinary Services throughout the food chain

Depending on the responsibilities of the Competent Authority, the responsibilities of the Veterinary Services may be limited to the first part of the food chain (from farm to slaughterhouse/abattoir and associated premises for further processing) while in other cases the Veterinary Services may be responsible for the whole food chain.

a) Primary production

Through their presence on farms and collaboration with farmers, Veterinary Services play a key role in ensuring that animals are kept under good sanitary and hygienic conditions, and in the early detection, surveillance and treatment of animal diseases, including conditions of public health significance.

In regard to food safety, Veterinary Services provide guidance to farmers on practices that minimise physical and chemical hazards (for example, mycotoxins, environmental contaminants and pesticide residues) in primary production, including animal feed.

Veterinary Services play a central role in ensuring the responsible and prudent use of veterinary medicinal products, including antimicrobial agents in accordance with Chapter 6.9. in animal husbandry. This helps to minimise the risk of non-compliant levels of veterinary drug residues in food of animal origin and the development of antimicrobial resistance.

Veterinary Services also play an important role in ensuring traceability throughout the food chain by verifying animal identification in accordance with Chapters 4.1 and 4.2.

b) Slaughter, processing and distribution

Activities at the slaughterhouse/abattoir should be designed and implemented according to an integrated, risk-based approach in accordance with Chapter 6.2. Veterinary Services have an essential role in ensuring that these activities, including meat inspection, minimise foodborne risks to public health. This may be provided by supervision and verification of process control and direct involvement in operational activities such as ante- and post-mortem inspection. Slaughterhouse/abattoir inspection of live animals and their carcasses plays a key role both in the surveillance network for animal diseases and zoonoses and in ensuring the safety and suitability of meat and by-products for their intended uses. Control or reduction of biological hazards of public health and animal health importance by ante- and post-mortem meat inspection is a core responsibility of Veterinary Services.

Veterinary Services may be responsible for overseeing the control measures during processing and distribution of food of animal origin. They also play an important role in raising the awareness of food producers, processors and distributors regarding measures required to assure food safety.

c) Assurance schemes and certification of food of animal origin for international trade

Veterinary Services have an essential role in overseeing assurance schemes and certifying that food of animal origin complies with animal health and food safety standards.

Other Competent Authorities may also be involved in providing assurances and certification of food of animal origin (for example, pasteurisation of milk products) for international trade.

3. Foodborne disease outbreaks

Veterinary Services play a key role in the investigation of, and response to, foodborne disease outbreaks, including the implementation of control measures. This work should be carried out in close collaboration with public health professionals, analysts, epidemiologists, food producers, processors and traders and any others involved.
Because of the global nature of the food trade, *Veterinary Services* should work with other national agencies in reporting to international emergency foodborne disease networks, such as the International Network of Food Safety Authorities (INFOSAN), and in utilising such information for preparedness.