

Remote ante- and post-mortem inspection in low-capacity slaughterhouses and game-handling establishments

Comments on two EU public consultations amending Delegated Regulation (EU) 2019/624 and Implementing Regulation (EU) 2019/627

Submitted by FVE together with its Sections, EASVO (European Association of State Veterinary Officers), EVERI (European Veterinarians in Education, Research and Industry), UEVH (Union of European Veterinary Hygienists) and UEVP (Union of European Veterinary Practitioners).

Summary

The Federation of Veterinarians of Europe (FVE) and its sections EASVO, EVERI, UEVH and UEVP represent around 330,000 veterinarians across 38 European countries aims to enhance animal health, animal welfare, and public health and to protect the environment by promoting the veterinary profession. We welcome the opportunity to contribute to the public consultations amending Delegated Regulation (EU) 2019/624 and Implementing Regulation (EU) 2019/627.

Further developments of technologies for remote ante- and post-mortem inspection are welcomed in principle. It provides an opportunity to employ video, artificial intelligence and other computer-based technologies as a **supplement to, and in support of,** conventional on-site ante-mortem and post-mortem inspection. However, **the official veterinarian should remain able to obtain sufficient information to exercise professional judgement** on the inspection and fulfil the objectives of Official Controls Regulation (EU) 2017/625, Art. 17 and 18, relating to public health, animal health and welfare. **Technology should function as an “extra pair of eyes” augmenting Official Control staff — not replacing them.** A human must remain constantly in the loop to respond quickly and effectively without undue delay.

While the Official Control Regulation laid down the possibility for Member States to allow for assistance of official auxiliaries in the pre-selection, to the best of our knowledge, there are **no publicly available EU-wide figures** indicating how many Member States use of the specific derogation. To our knowledge, the take up has been limited and as such **experiences and views differ widely.**

Our main feedback:

- **The proposed model** – official auxiliary on site and the official veterinarian involved remotely only once an abnormality has already been suspected or detected – **is worrying and inadequate.** In coherence with the practical nature of assistance described in 2019/624 article 3 point 1, we believe the veterinarian should be able to watch online all the animals presented for AMI in small establishments, as has been done in the published pilot and feasibility studies¹, e.g. via live video technology, subject to a detailed validation dossier, reliable technology and solid contingency planning.

¹ Denmark: <https://doi.org/10.3389/fvets.2025.1570452> (2025)
Sweden: <https://doi.org/10.3389/frfst.2025.1603989> (2025)

- A mandatory **fallback to on-site inspection by an Official Veterinarians** in case of system failure (power, IT, connectivity), **infrastructure readiness** and **OV availability without undue delay must be required**.
- Remote AMI must meet defined **validation criteria**: reliability, repeatability, reproducibility, auditability, traceability
- Slaughterhouses with a history of **incompliances** — including in relation to animal welfare, stunning, hygiene, labelling, or FCI reliability — **shall be excluded** from remote or reduced oversight models and must operate under permanent on-site Official Veterinarian presence. Additionally, even in slaughterhouses eligible for reduced oversight, **animals originating from holdings or establishments where serious incompliances have been identified** during official controls — including in relation to animal welfare, stunning, transport, hygiene, or labelling — shall be **excluded**.
- Member States using official auxiliaries shall report back and may be subject to **targeted audits within one year of notification to the PAFF Committee** to ensure harmonisation, verify sufficient guarantees, and **share best practices across Member States**.
- We **support the increase in flexibility** in the organisation of official controls, including by allowing post-mortem inspection of ungulates to be postponed by up to 72 hours where there is no suspicion of animal disease.
- We **oppose the doubling** of the **low-capacity threshold** market share. We suggest that, **before increasing the market share from 5% to 10%, Member States should first test the new provisions**, with its effects reviewed through an impact assessment five years after the new provisions enter into force.

Moreover, while each measure may appear acceptable in isolation, the **package as a whole must be assessed together**. Facilities at 8–10% of national fresh meat production operating under (a) (AI-assisted) camera systems, (b) no continuous OV presence, and (c) OV consulted only on suspicion or after detection, represents a qualitatively different risk profile than any individual measure suggests. The **cumulative impact of this package** on facilities newly brought into scope by the threshold change has not been assessed.

We also note that definitions based on national market share may result in **different interpretations and levels of access** as well as divergent standards for businesses of the same size, thereby leading to a distortion of competition between Member States. Greater harmonisation would improve consistency and legal certainty.

1. Background

Regulation (EU) 2017/625 (the *Official Controls Regulation*) sets the framework for official controls by Member State authorities. *Article 18 lays down since 2019 specific rules on official controls and for action taken by the competent authorities in relation to the production of products of animal origin intended for human consumption*

'1. The official controls referred to in paragraph 1 performed in relation to the production of meat shall include:

(a) the ante-mortem inspection performed in the slaughterhouse by an official veterinarian who may, as regards pre-selection of animals, be assisted by official auxiliaries trained for that purpose;

It is supplemented by **Delegated Regulation (EU) 2019/624** and implemented by **Implementing Regulation (EU) 2019/627**, which together lay down since 2019 **specific rules for the performance of official controls on the production of meat.**

Article 3 lays down criteria and conditions establishing when ante-mortem inspections in certain slaughterhouses may be performed by an official auxiliary.

'1. By way of derogation from Article 18(2)(a) of Regulation (EU) 2017/625, ante-mortem inspections may be performed by an official auxiliary under the supervision of the official veterinarian on species other than poultry and lagomorphs, provided that the procedures applied in the slaughterhouse comply with the following criteria and conditions:

(a) the tasks within ante-mortem inspections are of a purely practical nature and only concern one or more of the following:

(i) verification that the food business operator complies with the requirements related to food chain information and to the animal's identity check;

(ii) the preselection of animals showing possible abnormalities as regards human health, animal health and animal welfare requirements;

(b) the official veterinarian is immediately informed by the official auxiliary performing the inspection when possible, abnormalities are observed or suspected and the official veterinarian then carries out the ante-mortem inspection in person; and

(c) the official veterinarian regularly verifies that the official auxiliary is carrying out his/her tasks properly.

2. By way of derogation from Article 18(2)(a) of Regulation (EU) 2017/625, ante-mortem inspections may be performed on all species by an official auxiliary in a slaughterhouse under the responsibility of the official veterinarian, provided that the following criteria and conditions are met:

(a) an ante-mortem inspection has already been carried out by the official veterinarian at the holding of provenance in accordance with Article 5;

(b) the official veterinarian is immediately informed by the official auxiliary performing the inspection when possible, abnormalities are observed or suspected and the official veterinarian then carries out the ante-mortem inspection in person; and

(c) the official veterinarian regularly verifies that the official auxiliary is carrying out his/her tasks properly.’

Competent authorities in some Member States report difficulties in meeting the requirement for the *physical presence of the official veterinarian* during these inspections, particularly in low-capacity establishments, citing a shortage of available official veterinarians. On this basis the Commission has opened **two linked public consultations**:

- **Delegated Regulation amending (EU) 2019/624** – remote ante- and post-mortem inspection under the responsibility of the official veterinarian, enhanced role for official auxiliaries, and an increased low-capacity threshold (initiative 17575).
- **Implementing Regulation amending (EU) 2019/627** – use of computer-based technologies (including artificial intelligence), a derogation from the timing of post-mortem inspection, and an increased threshold (initiative 17574).

The proposal builds upon earlier agreed principles. Food Business Operators (FBO) are responsible for the safety of the produced food as laid down in Regulation (EC) No 178/2002, ante-mortem and post-mortem meat inspection are part of meat safety assurance systems, which covers the value chain from pre- to post-harvest. Official Veterinarians are responsible for verifying this, especially when derogation of official controls is performed under the responsibility of an official veterinarian. Many of the provisions here build upon already established provisions for the assistance of official auxiliaries in certain ante and post-mortem inspection tasks under the supervision of the Official Veterinarian.

To our knowledge, there are **no publicly available EU-wide figures** indicating how many Member States make use of the specific derogation allowing **ante-mortem inspection (AMI) by official auxiliaries under OV responsibility** in slaughterhouses, especially for low-capacity slaughterhouses.

EU audits and scientific overview material consistently indicate that **Member States generally comply with the standard model (OV-led AMI)** and **flexibilities and derogations are applied unevenly** depending on national organisation of official controls (e.g. **incorrect or extended delegation** (e.g. audit reports indicated use of “designated veterinarians” instead of official veterinarians)². More transparency in this field is urgently needed.

² <https://ec.europa.eu/food/audits-analysis/audit-report/download/15665>, <https://ec.europa.eu/food/audits-analysis/audit-report/download/15918>

2. What the proposals would change

The main elements put forward across the two drafts are:

- **Remote ante- and post-mortem inspection** is permitted under the responsibility of the official veterinarian using cameras or video applications (e.g. on smartphones).
- **Computer-based technologies** (including AI) may be used to support both ante-mortem and post-mortem inspection, where validated by the food business operator to the satisfaction of the Competent Authority.
- **Official auxiliary on site; official veterinarian remote** and consulted only when an abnormality is suspected or detected – i.e. the veterinarian is not continuously online.
- **Delayed post-mortem inspection** of up to 72 hours for ungulates and up to 24 hours for poultry and lagomorphs.
- **Low-capacity threshold raised from 5% to 10%** of the total fresh meat produced in a Member State, so that more establishments can use the derogations.
- **Enhanced training for official auxiliaries**, covering clinical symptoms of listed diseases and the measures to be taken on suspicion or outbreak.

3. Our position

We generally welcome the further development of technologies, including in the field of remote ante- and post-mortem inspection. We consider the **proposed exclusive on-site presence of the official auxiliary instead of the official veterinarian**, with the official veterinarian brought in remotely only once abnormalities are suspected or detected, to be **worrying and inadequate**. Previously, the role of auxiliary has been pre-selection under supervision (i.e. the official veterinarian is present on the premises during the time necessary to perform that action, OCR, Art. 17)) and of purely practical nature. Now, the role of official auxiliary is much more independent, and it is **no longer under direct supervision** with an official veterinarian on site. FVE believes that in coherence with the practical nature of assistance described in 2019/624 article 3 point 1, the veterinarian should watch online all the animals presented for AMI in small establishments, as has been done in the published pilot and feasibility studies³.

2. *By way of derogation from Article 18(2)(a) of Regulation (EU) 2017/625, ante-mortem inspections may be performed on all species by an official auxiliary in a slaughterhouse under the responsibility of the official veterinarian, provided that the following criteria and conditions are met:*

(a) an ante-mortem inspection has already been carried out by the official veterinarian at the holding of provenance in accordance with Article 5;

³ Denmark: <https://doi.org/10.3389/fvets.2025.1570452> (2025)

Sweden: <https://doi.org/10.3389/frfst.2025.1603989> (2025)

<https://doi.org/10.1016/j.foodcont.2023.109967> (2023).



- (b) the official veterinarian is immediately informed by the official auxiliary performing the inspection when possible, abnormalities are observed or suspected and the official veterinarian then carries out the ante-mortem inspection in person; and
- (c) the official veterinarian regularly verifies that the official auxiliary is carrying out his/her tasks properly.

4. The importance of public and animal health and the economy– it must not be weakened

A central concern of this paper is to prevent any **weakening the importance of public and animal health, food safety, animal welfare and economic losses**, where vets are recognised and trusted experts and provide independent assurance and certification. Through many years of training and practical experience, veterinarians bring expertise across animal disease control, animal health, zoonoses, human health, food-borne diseases, antimicrobial resistance (AMR) and environmental matters – the full *One Health* spectrum.

In carrying out ante- and post-mortem inspection, it is veterinarians who stand **at the front line** in recognising and combating **transboundary animal diseases** – such as foot-and-mouth disease (FMD), african swine fever (ASF), peste des petits ruminants (PPR), lumpy skin disease (LSD). A dimension that is regularly overlooked, preventing or at least immediately and effectively containing **enormous economic damage**.

In addition, they stand at the front line in recognising and combating **animal welfare problems**, such as those occurring during transport, ante-mortem inspection, and slaughter. By recognising these signs, veterinarians **trigger the early-warning system**: preventing animal suffering, averting serious risks to animal populations. Working with pre- and post-harvest food business operators, veterinarians therefore act as a **safeguard to produce food of animal origin as such, and on this point as a safeguard for the wider economy**.

We know from painful experience the scale of damage and animal suffering that can arise when veterinarians are **not deployed by default, regularly and continuously** at these critical points.

5. Reasoning

In a period of increasing disease incidence – in particular of rarer, more “exotic” animal diseases seen in recent years – it is important to use the animals’ final step before slaughter to detect signs of disease. After transport, which is a stressful situation for many animals, such symptoms are **more likely to manifest than before transport, even shorter ones to local or remote low-capacity slaughterhouses**.

Low-throughput slaughterhouses and game-handling establishments are important for regional slaughter capacity, animal transport reduction and resilience in the food chain. The proposal may reduce official control costs for such establishments and may allow official controls to be

organised more efficiently while **compromising** the objectives of public health, animal health and animal welfare protection.; Reduced direct supervision of AMI can entail risks, particularly for animal welfare monitoring, disease surveillance, food safety outcomes and public or trading partner confidence. These risks can be mitigated only if the use of remote and digital solutions is carefully targeted, AMI is carried out, at least remotely, under the responsibility of the official veterinarian, supported by robust national controls and applied in establishments with good compliance records. Complex system can generate cumulative effects that may not have initially been identified.

The ante-mortem inspection is defined as the verification, prior to slaughtering activities, of human and animal health and animal welfare requirements, including, where appropriate, the clinical examination of each individual animal, and the verification of the food chain information as referred to in Section III of Annex II to Regulation (EC) No 853/2004. Beyond the animal-welfare dimension, the animals must therefore be clinically examined after pre-selection on-site by Official Veterinarians, as this is a veterinary act. **Official auxiliaries do not possess the minimum 5-year university training and therefore** the risk of disease signs going undetected is higher.

6. Consequences of undetected signs

Failure to recognise disease symptoms has effects well beyond the individual establishment, reaching the agricultural and meat industries and trade:

- Unrecognised signs of animal diseases may delay detection, meaning that control measures such as movement restrictions must then be applied across a much wider area.
- Market and trade restrictions (nationally, EU-wide and for exports) must be expanded far more after delayed detection than after immediate detection, so larger market segments are affected.
- Under the current proposal, the threshold could double the share of national fresh meat production eligible for these provisions (5% → 10%). This is particularly significant because animals processed in small slaughterhouses are more likely to come from small-scale holdings, which are often less professionally integrated and where biosecurity measures may be less standardised or rigorously implemented.

7. Proposed amendments

Main amendments proposed:

- In coherence with the practical nature of assistance described in 2019/624 article 3 point 1, **the veterinarian should watch online all the animals presented for AMI in**

small establishments, as has been done in the published pilot and feasibility studies⁴.

- Requirements for **contingency planning** in case of technical failure should be introduced.
- The threshold should **only move from 5% to 10% after an impact assessment**, conducted five years after implementation, on how the system is functioning.

Side effect: The use of designated official veterinarians for remote ante-mortem inspection is **less time-consuming** than current on-site practice. This makes it possible **to address capacity bottlenecks without deviating from the principle** that the inspection must be carried out by official veterinarians.

Veterinarians are responsible for assuring public-health rules that ensure that only healthy animals are slaughtered under best possible conditions.

Further considerations:

- **Use of video, AI and computer-based technologies:** We welcome the inclusion and regulation of such technologies. Artificial intelligence and automated image-analysis systems can offer valuable support in identifying abnormalities and streamlining inspections, but they must serve solely as decision-support tools. Official inspection decisions may never rely exclusively on automated or AI-generated outputs; the final assessment and regulatory determination must always remain the responsibility of the Official Veterinarian. Minimum requirements should be established for image quality, camera positioning, connectivity, data security, traceability, documentation and access to recordings or other relevant data by the competent authority. Competent authorities should ensure that the technology used provides information of sufficient quality and reliability for the official veterinarian to make informed decisions.
- **Ante-mortem inspection and animal welfare:** Particular caution is needed regarding ante-mortem inspection. Veterinary clinical examination and supervision during high-risk live animal checks remain essential for animal welfare monitoring (during delivery, lairage, handling, and stunning), as well as for detecting notifiable and emerging diseases and other conditions relevant to public and animal health. Any remote arrangements must therefore ensure that a high level of protection and surveillance is maintained in these critical areas.
- **Remote ante-mortem and post-mortem inspection:** Ante-mortem and post-mortem inspections must remain official veterinary acts requiring professional judgement, expertise, and responsibility; remote pre-selection should serve only as a support

⁴ Denmark: <https://doi.org/10.3389/fvets.2025.1570452> (2025)
 Sweden: <https://doi.org/10.3389/frfst.2025.1603989> (2025)
<https://doi.org/10.1016/j.foodcont.2023.109967> (2023).

mechanism, never as a substitute for direct veterinary assessment. Remote inspection under the responsibility of the official veterinarian may be appropriate in defined low-risk situations, especially in establishments well known by the official veterinarian.

- **Delayed post-mortem inspection:** The possibility to postpone post-mortem inspection of ungulates by up to 72 hours could provide useful flexibility. However, the regulation should clarify what is meant by “from the time of slaughter”, including the precise point in the slaughter process from which the period is calculated. It should also require that carcasses, quarters and relevant parts remain individually identifiable, traceable, securely stored and clearly linked to the animal of origin until the official decision has been made. Also, traceability for byproducts must be contained until post-mortem results are made available.
- **Sampling and representativeness:** Where sampling approaches are applied, the competent authority should ensure that the sampling strategy remains risk-based and capable of identifying relevant food safety, animal health and animal welfare concerns. **Recital 3’s selection of most-recently slaughtered animals’ conflicts with risk-based and representative sampling; the FBO must not be able to control which animals are sampled by determining slaughter order. (3) Reliable carcass-to-animal traceability over 72 hours where slaughter continues must be guaranteed.**
- **Thresholds for low-capacity establishments:** The definition of eligible low-capacity abattoirs should be more clearly defined. Definitions based on national market share may result in different interpretations and levels of access between Member States. Greater harmonisation would improve consistency and legal certainty. Eligibility should nevertheless remain subject to a risk assessment by the competent authority and to evidence of satisfactory compliance history. **The 5→10% threshold increase should be carefully evaluated over time e.g. 5 years as it extends a derogation designed for the smallest establishments to facilities that may handle up to one-tenth of a Member State’s entire fresh meat production, does so permanently and unconditionally without evidence of impact or technology readiness, and compounds without a clear impact assessment.**
- **Third-country equivalence and export implications:** EU meat exports (particularly to non-EU markets that recognise EU inspection standards) depend on those standards being maintained. If the inspection model is weakened, trading partners, especially those with equivalence agreements referencing physical OV presence, may challenge EU meat exports. Building on established engagement which has been carried out with trading partners to demonstrate equivalence in other areas shall be considered.

7.1 Detailed comments

- **Veterinarians are licenced professionals with increased accountability:** Commission Delegated Regulation (EU) amending Commission Delegated Regulation (EU) 2019/624 as

regards ante- and post-mortem inspections in low-capacity slaughterhouses and game-handling establishments states, in Recitals 2 and 5, that some Member States report a lack of official veterinarians. However, FVE data shows that the veterinary profession in the EU has been growing overall, and there is no general shortage of veterinarians⁵. In some Member States, the issue is rather a sectoral and geographical mismatch between supply and demand. Experience shows that where positions are made financially attractive — for example in Ireland — there is no difficulty in recruiting official veterinarians for AMI and PMI duties in low-capacity slaughterhouses. Many countries also successfully recruit private veterinary practitioners who are delegated to work in slaughterhouses as inspectors (e.g. Ireland⁶, Belgium, etc). It is therefore **important that Member States make these positions attractive, rather than relying on technological substitutes to compensate for underinvestment in the workforce**. This is not only a recruitment issue but also an integrity issue. Official veterinarians are bound by professional licensing requirements and can face disciplinary action, including loss of license, for misconduct. FVEs 10 principles of certification underpin the best practice, including that veterinarians should certify only those matters, which are within their own knowledge, can be ascertained or attested either personally or by another veterinarian, who has personal knowledge of the matters in question and is authorised to provide the certificate⁷. **Addressing remuneration, working conditions, and oversight is therefore not a side issue but a core element of safeguarding the integrity of the inspection system.**

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- **Need to clarify 'other staff'**. Recital 8 refers to 'other staff designated by the competent authority.' This term is too vague and should be clarified.
- **New Recital X introducing targeted reporting and potential audits.** Data is lacking as to which Member States have already applied the existing derogations, and how they are being assured. When implementing the derogation referred to in paragraph 1, account should be taken of the **experience gained by Member States that have notified the Commission** and the Standing Committee on Plants, Animals, Food and Feed (PAFF Committee) of their use of official auxiliaries for ante-mortem inspection. In order to ensure harmonised application of Union rules, verify that sufficient guarantees are maintained, and capture lessons learned to inform best practices across Member States, those Member States should report back to the PAFF in due time, and may be subject to targeted audits by the competent authorities or, where appropriate, by the Commission services, within the year following the implementation of such notification. The findings of these audits, including identified best practices, should be made available to other Member States.

⁵ https://fve.org/cms/wp-content/uploads/FVE-Survey-2023_updated-v3.pdf

⁶ <https://www.gov.ie/en/department-of-agriculture-food-and-the-marine/publications/food-safety-public-health-and-consumer-issues/>

⁷ <https://fve.org/cms/wp-content/uploads/FVE-10-PRINCIPLES-OF-VETERINARY-CERTIFICATION.pdf>

- **Clarify On-Call of the Official Veterinarian:** New paragraph 2a(a). .. the official auxiliary performing the inspection consults remotely and immediately the connected designated on-call official veterinarian where possible abnormalities as referred to in Article 3(1) (a) of the same Regulation are observed or suspected.
 - **The proposal should clarify that the designated official veterinarians must be formally on call (and paid). Without this, accountability cannot be ensured. All staff involved in the AMI and PMI should be appropriately remunerated for the expertise and assurance that they bring.**
- **Introduce contingency plan:** New paragraph 2a (a). Add: Where remote communication cannot be established — for example due to electricity outages, hardware or software failures, or network connectivity issues — the competent authority shall ensure that appropriate alternative arrangements are in place. Provisions shall be foreseen for the official veterinarian to be available without undue delay to intervene where necessary." **Contingency planning is essential:** any system failure, whether caused by power loss, hardware or software malfunction, or loss of network connection, must trigger an automatic default to physical OV inspection. Infrastructure readiness is a prerequisite — many small facilities may lack a stable high-quality internet connection while minimum availability of the official veterinarian on call must be guaranteed.⁸
- **Introduce validation criteria:** New paragraph 2a (c). ... has validated the remote consultation procedure meeting regulatory, scientific, technical, and operational criteria.... **It is important for remote procedures to have defined validation criteria (including reliability, repeatability and reproducibility, auditability and traceability for each AMI) to maintain disease surveillance sensitivity. Validation documentation should be retained in a formal dossier and made available to competent authorities or auditors on request.**

For reference:

- Swedish feasibility study⁹ showed agreement up to **~99%** in diagnostic performance for pigs and mixed species settings
- Danish pilot study¹⁰ showed accuracy around **90–99%** in diagnostic performance in cattle trials

⁸ A Danish pilot study found that success depends on the system reliably transmitting all relevant sensory information, which in turn requires suitable video equipment, sufficient lighting, and a reliable connection ($\geq \sim 3$ Mbps, with low latency preferred). <https://www.frontiersin.org/journals/veterinary-science/articles/10.3389/fvets.2025.1570452/full>

⁹ <https://www.frontiersin.org/journals/food-science-and-technology/articles/10.3389/frfst.2025.1603989/full>

¹⁰ <https://www.sciencedirect.com/science/article/pii/S0956713523003675?via%3Dihub>,
<https://www.frontiersin.org/journals/veterinary-science/articles/10.3389/fvets.2025.1570452/full>

- **Introduce annual verification:** New paragraph 2a(d). Add: "The competent authority shall verify and document, on a regular basis and at least annually, the reliability of the system through inter-slaughterhouse proficiency tests as external quality control method to measure accuracy . These trials shall cover multiple species (e.g. cattle, pigs, sheep), different types of low-capacity slaughterhouses, an adequate sample size, and real-world variability in lighting, animal movement, and stress conditions."
- **Strengthen training paragraph:** Paragraph 2a(e). Add: "*The competent authority shall ensure that official auxiliaries receive **initial and continuous training**, including both **theoretical and practical components**, and shall verify their competence through regular theoretical and practical assessments.*" Competence and training of official auxiliaries are critical to ensuring equivalence with inspections carried out by official veterinarians. A Swedish study¹¹ found that training and inter-inspector alignment are essential for achieving reliable and consistent results.
- **Ensure consistency:** Article 7(1)(d)(i) says ... 'by the official auxiliary performing the ante-mortem inspection... '. It is important to ensure consistent and explicit distinction between ante-mortem and post-mortem inspection throughout the text.
- **Detailed comments on 7.1.2. COMMISSION IMPLEMENTING REGULATION (EU) amending Implementing Regulation (EU) 2019/627** as regards the use of computer-based technologies for the purposes of ante-mortem and post-mortem inspection and the derogation from the timing of post-mortem inspection in low-capacity slaughterhouses and game-handling establishments – paragraph 4
 - Proposed new provision:
 - Add new point (g): "animals from establishments for which the food chain information referred to in Section III of Annex II to Regulation (EC) No 853/2004 has previously been found to be absent, incomplete or unreliable, and where such deficiencies may adversely affect the proper performance of ante-mortem inspection or the assessment of risks to human or animal health."
 - Add new point (h): (e) animals that are intended to be slaughtered without prior stunning in accordance with Article 4(4) of Regulation (EC) No 1099/2009, where the absence of the official veterinarian during ante-mortem inspection could compromise the verification of compliance with Union rules on the protection of animals at the time of killing.

¹¹ <https://www.frontiersin.org/journals/food-science-and-technology/articles/10.3389/frfst.2025.1603989/full>

While respecting the rights of religious communities, FVE strongly opposes slaughter without stunning¹². The absence of official veterinarians should never lead to a loophole for slaughter without stunning in low-capacity slaughterhouses.

- Terminology clarification needed: The reference to "**WOAH-listed diseases**" appears overly broad. It should be clarified whether the provision is intended to cover all WOAH-listed diseases, or only a subset — for example, categorised animal diseases under Regulation (EU) 2016/429. Closer alignment with the disease categorisation already established under European Union Animal Health Law is recommended to ensure legal certainty and avoid inconsistent interpretation across Member States.

8. Conditions for implementation

- Only establishments with a satisfactory compliance history and an operational culture that supports effective official controls should be eligible.
- No establishments slaughtering animals without stunning can be eligible, as the welfare risks are much higher¹².
- Official auxiliaries must have robust training, demonstrated competence with structured proficiency testing and clear instructions for escalation to the official veterinarian. The training content set out in Annex II, Chapter II, point 5(c) of Delegated Regulation (EU) 2019/624 is of vital importance.
- Remote inspection arrangements should ensure that the official veterinarian receives sufficient information, in a timely manner, to exercise professional judgement and take decisions on official controls.
- Digital systems should meet minimum technical standards, including stable high-quality connectivity, adequate image resolution, appropriate camera coverage, data integrity and secure storage.
- Given the Official Veterinarian remains accountable, they must have the professional authority (as an individual) to require physical attendance, additional inspection or suspension of remote arrangements where necessary.
- During the AMI pre-selection, procedures must ensure that abnormalities, welfare concerns, suspected disease, traceability failures or technological failures trigger immediate escalation and **Official Veterinarians =on site without undue delay**.
- The competent authority should periodically review whether remote inspection arrangements maintain equivalent outcomes for food safety, animal health, animal welfare and consumer confidence, as they should for the conventional meat inspection.

¹² https://fve.org/publications/slaughter_without_stunning/



- Food Business Operators and Competent Authorities work together on international trade. Slaughterhouses must keep the right to demand physical and immediate presence of official meat inspection to fulfil their demands from markets.

9. Recommendations and deadlines

In conclusion, the principle of the proposal is supported as advancement toward modern, flexible, and risk-based meat inspection. However, implementation should preserve the central role and accountability of the official veterinarian and ensure that the official veterinarian continues to receive sufficient information to exercise independent professional judgement, uphold effective disease surveillance and animal welfare monitoring, and ensure that digital technologies serve to augment, rather than replace effective human official controls. We ask the Commission and Competent Authority to amend the proposal so it can meet these conditions.

Date	Milestone
25 June 2026	Public consultation (deadline for submissions)

9. Consultation links

Initiative 17575 – facilitating ante- and post-mortem inspections:

[ec.europa.eu – have-your-say – initiative 17575](https://ec.europa.eu/have-your-say/initiative/17575)

Initiative 17574 – facilitating practical arrangements for inspections:

[ec.europa.eu – have-your-say – initiative 17575](https://ec.europa.eu/have-your-say/initiative/17575)