Opinion of the Economic and Social Committee on:


(2002/C 94/06)

On 12 September 2001 the Council decided to consult the European Economic and Social Committee, under Article 152 of the Treaty establishing the European Community, on the above-mentioned proposals.

The Section for Agriculture, Rural Development and the Environment, which was responsible for preparing the Committee’s work on the subject, adopted its opinion on 29 January 2002. The rapporteur was Mrs Davison.

At its 388th plenary session on 20 and 21 February 2002 (meeting of 20 February), the European Economic and Social Committee adopted the following opinion by 85 votes to one with seven abstentions.

1. Introduction

1.1. Zoonoses are diseases or infections that can be transmitted from animals to humans. Infections usually happen as a result of eating products of animal origin. Salmonellosis is the most reported zoonotic disease in European countries. Salmonella comprises more than 150 serotypes and can be found in a whole series of food products such as raw eggs, poultry, pork, beef, other meat products and dairy products. Familiar symptoms and their severity vary according to the serotypes. They are diarrhoea, fever, headaches, vomiting. Nevertheless salmonellosis is a serious illness and sometimes can even be fatal. Complications can affect everybody, but babies, older persons and pregnant women are particular risk groups.

1.2. Salmonella is just one zoonotic agent. The second ‘most common’ in humans, is Campylobacter. The main symptom is diarrhoea, but Campylobacter infection can sometimes lead to a nerve disorder and paralysis in rare cases. It is mainly found in chicken meat.

1.3. Listeria and certain types of E.coli are also the zoonotic agents for two other common infections (1).

2. Impact of zoonoses on human health

2.1. There are no reliable and comparative figures on the number of cases of illness or death in the EU as a result of zoonoses. National reporting systems differ and only a small proportion of the number of cases of illness are reported. Campylobacter is estimated to be responsible for 127 000 reported cases of food-borne illness in 1999 (2). According to data published by the Office for International Epizooties (OIE), in 2000 (3), more than 219 141 human cases of salmonella infections in humans were reported in the EU countries. The European Commission is collecting data too, published yearly in an annual report on salmonellosis (4). It provides an estimate of a total number of 165 569 cases of human salmonellosis in 1999. However, the wide and inexplicable differences in data between Member States indicate failures in both monitoring and co-ordination.

2.2. In addition to personal suffering and premature death, zoonoses are responsible for major healthcare expenditure and loss of working hours. According to WHO (5), cost estimates per reported case of human salmonellosis range from approximately EUR 1 100 to EUR 1 500 in Europe. The UK Food and Drink Federation has estimated that the cost to the health service of England and Wales of treating illness caused by Salmonella and Campylobacter was UK£ 27.8 million in 1999.

(1) Listeria monocytogenes, Escherichia coli (Source, recital (10), Proposal for a directive on the monitoring of zoonoses and zoonotic agents).


(3) Source: OIE, Handistatus/OIE, website: www.OIE.int.

(4) According to the EU Commission, the report (COM(2001) 452 fin) has to be carefully interpreted. For certain zoonotic agents, comparable or uniform surveillance plans are not applied in the European Union. Data may not necessarily derive from national plans with specific and statistically planned sampling.

(5) WHO Fact Sheet No 139, January 1997.
2.3. The Committee therefore recommends a much more robust and rapid approach than the Commission is proposing.

3. **Outline of the European Commission’s proposals**


3.2. The proposed directive obliges Member States to put in place improved and better co-ordinated monitoring systems. It lays down a system for monitoring certain zoonotic agents throughout the human food and animal feed chain. In addition, Member States will be required to take part in co-ordinated monitoring programmes in order to establish baseline values on the level of most important zoonotic infections in each Member State. These programmes will be co-financed from the Community budget. The new monitoring requirements also include the collection of data on the incidence of zoonotic diseases in humans, on the prevalence of food-borne outbreaks and the monitoring of antimicrobial resistance in certain zoonotic agents.

3.3. The proposed regulation sets out a framework for pathogen reduction to reduce the prevalence of these organisms by setting Community-wide targets for zoonotic agents in specific animal populations, and possibly at other stages along the food chain. Community targets for this reduction policy are to be set progressively on the basis of scientific opinion, according to a fixed timetable. Salmonella is identified as the priority target, especially in poultry products and eggs.

3.4. The targets are to apply from 2005 onwards to breeding flocks of chicken, from 2006 onwards to laying hens, from 2007 onwards to broilers, from 2008 onwards to turkeys and breeding pigs. After a transitional period marketing restrictions will apply to table eggs from flocks suspected or confirmed of harbouring specific types of salmonella (from 2008 onwards). Poultry meat will also have to comply with set microbiological criteria from 2009 onwards. A procedure is also laid down to set targets for other animal populations or zoonotic agents other than salmonella.

3.5. To achieve the reduction targets, Member States will need to adopt national control programmes and encourage the private sector to collaborate. For trade between Member States in relevant live animals and hatching eggs, certification of salmonella status will be made obligatory according to the above time schedule. With respect to third country imports into the EU, equivalent certification measures will be required following the same schedule. The proposal gives the Commission the option to exclude certain control methods to be used against zoonoses such as the use of antibiotics or vaccination in animal populations, or to decide on conditions for their use.

4. **Existing Community legislation**

4.1. Council Directive 92/117/EEC seeks to establish a reliable reporting system on the prevalence of zoonoses generally, and to bring about also monitoring, control and ultimately eradication of some invasive serotypes of salmonella in poultry breeding flocks. It also provides for the development of control measures for other zoonotic agents than salmonella.

4.2. Currently the control measures cover only two types of salmonella in poultry breeding flocks.


4.4. Provisions on the control of certain zoonoses at farm level have been laid down in various Directives regarding animal health conditions in trade of live animal, e.g. provisions on bovine tuberculosis and brucellosis in Directive 64/432/EEC. Furthermore, there are rules in certain hygiene Directives providing for the control of zoonoses at farm level, e.g. in Directive 92/46/EEC regarding dairy herds. Measures on the control of zoonotic agents in processing and distribution of foodstuffs of animal origin are provided in the corresponding hygiene directives. This legislation is currently being restructured and revised in order to establish a coherent and consistent body of hygiene rules, based on an integrated approach applied at every stage in the food chain (Opinion on Hygiene of foodstuffs) (2).

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4.5. Community legislation on the monitoring and control of the zoonoses has been developed gradually and to varying degrees in different Member States. Experience shows, however, that not all Member States were able to fully implement the system foreseen by the ‘Zoonoses’ Directive. Only seven Member States (DK, IRL, FIN, S, A, F, NL) have been recognised as fully implementing the provisions on salmonella control of breeding flocks. The European Commission indicates that authorities have taken effective measures against salmonella and other zoonotic organisms in all Member States either alone or in co-operation with private businesses. The Committee regrets that these measures are not detailed in the Commission’s report.

5. Recommendations

General recommendations

5.1. In April 1999, the EESC adopted an opinion on zoonoses (1). The Committee supports all the points adopted in 1999, many of them being still relevant to the current situation. In particular, we prioritise public health, regret the delays in implementing EU legislation and propose a high profile conference involving all the players in order to create political and economic resolve.

5.2. The publication of the European Commission proposals is much welcomed. The prevention of zoonoses is an important element of food safety. In addition, as stated above, zoonoses are responsible for major individual suffering and premature death, as well as major healthcare expenditure and loss of working hours. The Committee strongly believes that the prevention of zoonoses should be a top priority for the EU and the Member States and that appropriate resources should be devoted to this end.

5.3. The Committee starts from the proposition that food supplied to consumers should be safe. Recent food scares have resulted in loss of consumer confidence and decrease of consumption in products concerned. The Committee feels that Public Authorities failed to ensure the effective implementation, control and enforcement of the legislation as well as certification process.

5.4. The Committee therefore believes that it is in the common interest of all parties involved in the food chain. This will also contribute to ensuring the competitiveness of European farming at international level, which must remain associated with high quality standards and production methods.

5.5. Member States will bear the greatest responsibility in the establishment of the national control programmes and control of their application. Reports have clearly shown that Directive 92/117/EEC has been poorly implemented in Member States. The deadlines set in Directive 92/117/EEC have not been respected and the Committee feels that the Commission should have taken action much sooner on this issue. This situation and its negative impact on food safety, consumer protection and EU trade has been strongly criticised by the EESC in the 1999 Opinion on zoonoses (1). We therefore express concern about the implementation of this new proposed regulation, which places further requirements on Member States, when the implementation of the 92/117/EEC Directive is still not completed. We agree that Member States have the main responsibility for implementing the proposed regulation but we ask the Commission to allocate appropriate resources for regular Community controls of national programmes, in particular through the Food and Veterinary Office (FVO) in order to put more pressure on the Member States. Only recently, FVO inspected salmonella during a series of missions on the production of poultry meat. But the report still has to be finalised. A priority for the FVO should also be to encourage the Commission to use the infraction procedure, which has never been used in the area of legislation on zoonoses.

5.6. The European Commission proposals refer to antibiotic resistance, which is welcome. The prevention of zoonoses and antibiotic resistance are two interconnected issues. Zoonoses in domestic animals lead to increased use of antibiotics, which has been identified as a major cause for the development of bacteria resistant to antibiotics. Therefore the prevention of zoonoses is an important element of a comprehensive strategy for the prevention of antibiotic resistance. The Committee is aware that the problem of antibiotic resistance must take account of human healthcare, veterinary medicine and animal husbandry as part of the same eco-system (2). The fight against antibiotic resistance will only be successful if comprehensive policies are adopted, covering areas such as antibiotic usage in humans and animals, monitoring of antibiotic usage, surveillance of antibiotic resistance, research, etc.

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6. Monitoring of zoonoses and zoonotic agents

6.1. The proposed directive on the monitoring of zoonoses and zoonotic agents would oblige Member States to undertake action in monitoring zoonotic organisms in general and ensure a better co-ordination of the monitoring and publication of data. As mentioned by the European Commission, the collection of human data on the incidence of zoonotic disease is of paramount importance to base food safety legislation on scientific advice and to obtain feedback on the effectiveness of the control applied.

6.2. We welcome inclusion in the monitoring of a wide range of zoonoses and zoonotic agents as recommended by the Scientific Committee on Veterinary Measures relating to Public Health (1). In view of the importance of the issue, all operators in the food chain should be involved in monitoring zoonoses, feed producers included.

6.3. The Committee notes that the proposal does not specify which animal species the monitoring is to cover. The ‘new’ directive must clearly indicate that monitoring includes all sorts of domestic animal populations since the objective is to obtain sufficient knowledge for the preparation of specific prevention programmes. Also the proposal must confront the issue of multi-resistant bacteria.

6.4. The Committee stresses the importance of reliable and efficient monitoring of zoonoses. New zoonoses are emerging as a result of many factors, such as increased and freer movement of people and animals, global climate change, grafting organs or tissues, etc. The EU must be ready to identify, prevent and face these new zoonoses.

6.5. Member States shall prepare yearly reports on trends and sources of zoonoses, which they must transmit to the Commission and the future European Food Safety Authority (EFSA). The EFSA shall compile a synthesis report. It is important that both national and Community reports are made publicly available. The collection of national reports and the preparation of synthesis reports, must be one of EFSA’s priorities as well as the collection and dissemination of information on zoonoses. The Committee insists on full transparency of reporting procedures. Consumers and interested parties must have easy access to the information provided by Member States. This is an important element of information and of control of measures taken at national level.

6.6. Finally, we fully support the proposal to include the monitoring of antibiotic resistance in zoonotic organisms within the proposed directive. As already noted by the European Economic and Social Committee in its September 1998 Opinion on antibiotics (2), antibiotic resistance is a growing human and animal health problem, and needs to be rigorously attacked.

7. Control of salmonella and other food-borne zoonotic agents

7.1. With regard to the proposed regulation on the control of salmonella and other food-borne zoonotic agents, the creation of a framework for pathogen reduction policy is very much welcomed but we have many concerns regarding the practical implementation of the proposal.

7.1.1. The proposal would cover, in principle, all zoonoses. However, the specific control requirements cover only certain types of salmonella, especially in poultry products and eggs. We question the limitation of the scope of the regulation, which should include a wider range of pathogens and animal populations. For example, it is demonstrated that meat products, pork in particular, are also a major source of salmonella. And bacteria like Campylobacter and E.Coli are serious sources of human disease.

7.1.2. Community pathogen reduction targets for selected zoonotic agents in selected farming animal populations will be set according to a fixed timetable. The Committee supports the Commission proposal and the approach adopted but feels that the deadlines proposed for new measures are much too long. It is concerned that the first targets for the reduction of prevalence (3) will only be established by the end of 2003 for all salmonella types with public health significance in breeding flocks, and up to end 2006 for all salmonella types with public health significance in breeding herds of pigs. Mandatory testing and certification for trade will not apply before 2005 for salmonella in breeding flocks and 2008 for salmonella in breeding herds of pigs. The Committee feels that this is not acceptable. Zoonoses are a very serious problem that needs to be addressed urgently through a comprehensive set of measures. Reducing the prevalence of zoonoses is the interest of all operators of the food chain, from farmers to consumers.

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(3) See Annex 1 of the proposed regulation on the control of zoonoses.
7.1.3. One reason for urgent action is to solve the problem of trade within the EU. The various zoonoses profiles between the different EU countries lead to distortions of competition. Countries with stricter policies against zoonoses want to demand guarantees with regard to imports from other Member States. This must be resolved for the good functioning of the internal market with respect for the highest safety standards.

7.2. We welcome the certification system on salmonella within the EU. With respect to third country imports, we demand that a strict control of the application of 'Equivalent measures' be applied. This system is mainly based on evaluation by the Commission services of national control programmes, or on declarations made by the third countries. It must also include thorough spot controls by the FVO. The Committee insists that products imported from third countries comply with the same standards as products produced within the EU. This is in the interest of producers as well as consumers and cannot be guaranteed just by declarations from the exporting countries. A system of control must be put in place that complies with international trade rules.

7.3. The proposed regulation refers to the Community legislation on food hygiene (1). The Committee has urged that the implementation and full application of the principles of the HACCP (2) system, at every stage of the food chain, is a fundamental element in the control of zoonoses. The HACCP system prescribes a number of logical steps to be followed by operators throughout the production cycle in order to allow — through hazard analysis — the identification of points where control is critical with regard to food safety.

7.4. The Commission’s proposed regulation will not achieve its objectives if HACCP principles are not implemented right through the food chain. In March 2001, the Committee stated that 'The same hygiene rules and the same control methods must apply at all stages in the food chain — from primary production to delivery to the final consumer,' and that 'Each operator at each stage in the food chain remains fully responsible for the safety of his or her products' (3).

7.5. With regard to hygiene and good practices, the Committee reiterates its concern that action for the prevention of zoonoses must be taken at every stage of the food chain, covering primary level producers, animal feed and food manufacturers, slaughterhouses, trade and distribution. In particular, progress could be made quite rapidly by means of action to ensure stricter hygiene conditions in slaughterhouses, where contamination often occurs due to salmonella in contaminated animals spreading from the throat and intestine to the meat. Consumers have their share of responsibility too: food preparation hygiene is also very important. Consumer education must be stepped up and co-ordinated at EU level. This could be encouraged, for example by building on the European campaigns on Food Safety, and the Annual Young Consumer competition organised by the European Commission.

7.6. The Commission’s proposal concerning the hygiene of foodstuffs (4) refers to the possibility of using decontamination methods. The Committee is very concerned about the use of such methods, which should not be used to restore safety in a product that has been produced under poor hygiene conditions. The use of decontamination methods must be strictly controlled and in any case clearly labelled on the final product including imports.

7.7. Since 1996, the Committee has called twice on the Commission and other interested parties for a conference to create determination to take action on zoonoses. The Committee is actively engaged in activities aimed at raising public awareness on the issue of zoonoses, the scale of the problem and the need for urgent action. If the players in the food chain decided on a concerted response, the incidence of zoonoses could be reduced quite rapidly.

7.8. A comprehensive policy on the control of zoonoses should also address the issue of encouraging good agricultural practices across the board. Good quality management in farms will greatly contribute to the reduction of zoonoses. The CAP should aim at raising awareness on the issue and provide training and support to farmers willing to improve their production methods in order to respond better to consumer demand and contribute to the highest food safety level.

Brussels, 20 February 2002.

The President
of the Economic and Social Committee

Göke FRERICHS

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(2) HACCP: Hazard Analysis Critical Control Points.