In response to information provided by the competent authority, any factual error noted in the draft report has been corrected; any clarification appears in the form of a footnote.
Executive Summary


Planning of the official controls (inspections and sampling) is risk-based; its implementation is supported by adequate national legislation and guidance.

The competent authority has got a risk based control plan for official inspections and sampling covering feed additives, their ingredients and traceability. A robust system is in place for follow up actions in cases of non-compliances. Nevertheless, the effectiveness of official controls is weakened by deficient official sampling by county inspectors and on the verification of labelling requirements during official controls. The training provided does not support the official control staff to undertake their duties competently.

Official controls do not verify that, in case of export of non-authorised (in the EU) feed additives, the authorities of importing non-EU countries are informed of the reasons for which and the circumstances in which the feed concerned could not be placed on the EU market, nor that they had expressly agree to place such products into their countries.

The report makes a number of recommendations to the Hungarian competent authorities, aimed at rectifying the shortcomings identified and enhancing the implementation of the official controls in the area of feed additives and ingredients for their production.
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**ABBREVIATIONS AND DEFINITIONS USED IN THIS REPORT**

<table>
<thead>
<tr>
<th>Abbreviation</th>
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<td>EU</td>
<td>European Union</td>
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<td>EFSA</td>
<td>European Food Safety Authority</td>
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<tr>
<td>FeBO</td>
<td>Feed Business Operator</td>
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<tr>
<td>Feed Manufacturer</td>
<td>Processor producing animal feed</td>
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<td>GMO</td>
<td>Genetically Modified Organism</td>
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<td>HACCP</td>
<td>Hazard Analysis and Critical Control Points</td>
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<td>MANCP</td>
<td>Multi-Annual National Control Plan</td>
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<td>NFCSO</td>
<td>National Food Chain Safety Office</td>
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<tr>
<td>PCBs</td>
<td>Polychlorinated Biphenyls</td>
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<tr>
<td>RASFF</td>
<td>Rapid Alert System for Food and Feed</td>
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<td>VMP</td>
<td>Veterinary Medicinal Products</td>
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INTRODUCTION

The audit took place in Hungary from 20 to 28 March 2018 as part of the European Commission’s Directorate-General for Health and Food Safety 2018 work programme. The mission team comprised two auditors from the Commission, and was accompanied by representatives from the central competent authorities (the Ministry of Agriculture and National Food Chain Safety Office) throughout the audit.

An opening meeting with the competent authorities was held on 20 March 2018 during which the objectives, itinerary and the reporting procedures for the audit were confirmed.

OBJECTIVES AND SCOPE


The audit focussed on the competent authorities' performance of official controls on feed additives and ingredients for their production. In pursuit of the objective, the following sites were visited:

<table>
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<tr>
<th>Visit/meetings</th>
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<td>Local</td>
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<td>Producers of feed additives</td>
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<td>Producers of premixtures</td>
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<td></td>
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<tr>
<td>Importers of feed additives and/or premixtures</td>
<td>2</td>
<td></td>
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<td>Traders(^1) of feed additives and/or premixtures</td>
<td>2</td>
<td></td>
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<tr>
<td>Compound feed producers using feed additives and/or premixtures</td>
<td>2</td>
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\(^1\) Provided they meet the definition of "feed business" and "feed business operator" laid down by Article 3 of Regulation (EC) No 178/2002 of the European Parliament and of the Council
LEGAL BASIS

The audit was carried out under the general provisions of European Union (EU) legislation and, in particular, Article 45 of Regulation (EC) No 882/2004.

BACKGROUND

This is the first time that official controls on feed additives and ingredients for their production in the EU have been specifically audited by the Commission.

Feed additives and their mixtures (premixtures) are the essential ingredients in modern compound feed manufacture and their use is steadily increasing. In the EU in 2016, the annual consumption of minerals, feed additives and vitamins was approximately 5.4 million tonnes (compared to 4.6 million tonnes in 2014 and 4.7 million tonnes in 2015).\(^2\) A substantial quantity of feed additives and ingredients for their production is sourced from non-EU countries and it is important to be able to demonstrate that such imports do not contain undesirable substances. From 2010 to the end of 2017, there were 79 notifications issued for feed additives under the Rapid Alert System for Food and Feed (RASFF) for the presence of non-authorised genetically modified organisms (GMOs) (26), dioxins (21), heavy metals (17), veterinary medicinal products (VMPs) (5), microbiological contaminants (3) and other non-specified hazards (7). Most of these were for imported feed additives and ingredients for their production. Thus proper traceability of those substances/products is a vital prerequisite for effective control.

In Hungary there are 10 feed additive manufacturers (7 approved and 3 registered), 60 premixture manufacturers (49 approved and 11 registered), 16 importers (importing feed additives and/or premixtures) and 167 traders (trading feed additives and/or premixtures).

FINDINGS AND CONCLUSIONS

Legal acts quoted in this report are provided in Annex I and refer, where applicable, to the last amended version. Relevant articles or sections of the legislation cited in Annex I are referred to in the individual findings in this section of the report. In addition, a table is included as an Annex II to this report summarising the main legal requirements related to the specific provisions and measures laid down in the body of EU legislation pertaining to the control of feed additives.

5.1 STRUCTURE OF THE SYSTEM FOR OFFICIAL CONTROLS ON FEED ADDITIVES AND INGREDIENTS FOR THEIR PRODUCTION

5.1.1 Competent authorities involved

1. The organisation of official controls of feed business operators (FeBOs) is described in the Commission services' country profile for Hungary.\(^3\)

\(^2\) Source: European Feed Manufacturers' Federation

\(^3\) Available at: http://ec.europa.eu/food/audits-analysis/country_profiles/index.cfm?co_id=HU
2. In the feed area, in the Ministry of Agriculture, the Food Chain Safety Department is responsible for legislation, international affairs and strategic planning. The National Food Chain Safety Office (NFCSO) is the central competent authority which has a supervisory role, develops national guidance and directly performs ca. 60% of official sampling. Officials working at the county (19) or district (174) levels in County and District Governmental Offices are responsible for carrying out the official controls and ca. 40% of official sampling.

3. The audit team witnessed an adequate communication between officials at central and county level which is performed either via announcements on the NFCSO’s website, direct communication, technical support, joint inspections and training events.

4. There is a regular feed training programme whereby the representatives of the NFCSO organise training for the county and district feed safety officers on different topics. In the last three years training was provided on traceability, evaluation of laboratory results, implementation of official inspections, assessment of labelling, and implementation of official sampling. In the period 2015-2018, the central competent authority organised seven training courses per year for county and district officials in different regions. The audit team interviewed officials who had participated in these training courses but their knowledge on certain topics (e.g. labelling and official sampling) was not sufficient (see findings 35 and 45).

5. The NFCSO organises two meetings for county feed safety officers every year. During these meetings they provide updated information on legislative requirements in particular on new legislation, modifications to existing legislation and new scientific issues in the feed sector.

6. Hungary has a national law 65/2012 (VII.4.) on certain rules for the production, placing on the market and use of feed. Annex 8 of this regulation gives a detailed description on the implementation and assessment of the results of mixing homogeneity of feed, carry-over of coccidiostats, and medicated feed. Annex 12 gives instructions on the microbiological sampling of feed.

5.1.2 Registration/approval of feed business operators

7. The system of registration and approval of Feed Business Operators (FeBOs) is described in part 2.4 of the country profile for Hungary.

8. The list of approved or registered feed business operators is published on the NFCSO’s website, in accordance with Article 9(3) and Article 19(1)(2)(7) of Regulation (EC) No 183/2005.

9. The registration and, when necessary, approval of the FeBOs is the responsibility of the County Governmental Offices. All establishments visited were registered and, when necessary, approved as required by Articles 9 and 10 of Regulation (EC) No 183/2005, and the associated documentation was available.
10. In the approved establishments visited, the competent authority could demonstrate that comprehensive on-the-spot inspections were carried out prior to start-up of any activities; these included controls on Hazard Analyses and Critical Control Points (HACCP), traceability and other feed hygiene requirements in accordance with the requirements laid down by Annex II to Regulation (EC) No 183/2005. The approval procedure was in line with the requirements of Article 13 of Regulation (EC) No 183/2005.

**Conclusion on the structure of the system for official controls on feed additives and ingredients for their production**

11. The system in place ensures clear designation of competent authorities and adequate distribution of relevant tasks and responsibilities. National law further elaborates on those requirements in EU legislation which do not contain a detailed description and thus underpins the harmonised implementation of these requirements.

12. The system for registration and approval of feed business operators complies with relevant EU legislation and supports the effective implementation of official controls.

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**5.2 PLANNING AND IMPLEMENTATION OF OFFICIAL FEED CONTROLS**

**5.2.1 Inspections**

**5.2.1.1 PLANNING OF INSPECTIONS**

13. A procedure has been developed by the competent authority for the planning of inspections at registered and approved FeBOs. This procedure takes into account a range of primary data which is inputted onto a bespoke software system (e.g. results and time lapse from previous inspections, registration and/or approval, risk factors of the activities carried out, history of non-compliances, etc.), and weighted based on an algorithm with the objective of providing a risk value. A threshold (which is amended on a yearly basis taking into account a number of factors including available resources) is defined and in those cases where the risk value goes over the threshold, the FeBOs will be included in the draft annual inspection plan. This initial draft annual plan of inspections can be further modified at central level taking into account a number of factors (e.g. RASFF notifications, new/amended legislation and scientific publications, etc.). The amended draft annual inspection plan is then disseminated to feed safety officers working at the central and county levels for their comments; after that it is formally approved by the Ministry of Agriculture and sent for implementation to the County Governmental Offices and to the NFCSO.

14. As for the reliability of FeBOs' own checks, the competent authority stated that this was a risk factor taken into account for the planning of inspections. This is done so via the inclusion of the result of previous inspections as primary data onto the software system.
15. The central competent authority stated that the database feeding into the software system contains primary data of all approved establishments and registered manufacturers while relevant information on registered non-manufacturers is not complete.

16. The annual inspection plan is the basis upon which officials at county level perform their official controls. This plan is further adapted at county level via the addition of "complementary" inspections which were performed in all counties visited on top of those requested by the annual inspection plan. A number of reasons where provided to explain this working procedure which was described by the competent authority as a positive complement to the centrally planned inspection plan. Some of those reasons where: use local experience and knowledge, and other risk factors (e.g. production capacity, use of non-EU approved feed additives, coccidiostats or VMPs) which are not inputted as primary data into the software system.

17. The overall result is an inspection frequency of approved FeBOs of approximately once per year and once every two years for registered manufacturing FeBOs. Inspections of registered non-manufacturing FeBOs were, to a large extent, "complementary" inspections as, for the majority of cases, their risk value result was below the threshold defined at central level and thus not included in the annual inspection plan.

18. The frequency of those "complementary" inspections varied in between counties, and in one specific county it resulted in the total number of inspections being three times higher than those would have been planned in the annual inspection plan.

19. Participation in private certification schemes has no bearing either for the central planning or for the “complementary inspections” and, thus, does not influence the frequency of official controls.

20. The audit team observed that checklists, developed by the central competent authority, are used to ensure the uniformity of the conduct of official inspections in the different counties. Two general checklists exist: one for all types of manufacturing FeBOs and another for all other types of FeBOs. There are two specific checklists: one for approved feed manufacturers and another for other types of approved FeBOs. The specific checklists include more detailing questions on feed hygiene requirements, traceability, labelling, own control system, drying, and use of VMPs and/or coccidiostats.

21. All inspectors are required to use and complete in all relevant points of the checklists during official inspections and then upload the results directly into the central database. Efforts are currently being made to improve the flexibility and accessibility of the system through the development of purpose-built applications that can be used off-line. The checklist is an essential part of the report of the official controls.

22. The central competent authority demonstrated that, when non-compliance is identified, the risk-based algorithm (see finding 13) increases the total risk score of the FeBO. If the non-compliance is serious (e.g. deficiencies relating to feed safety, recurrent
problems etc.), the total risk value will be significantly increased resulting in an obligatory inspection of this establishment during the following year.

5.2.1.2 IMPLEMENTATION OF INSPECTIONS

23. In all counties visited, all planned inspections had been performed in 2016 and 2017. All county officials used the centrally prepared checklists, and evidence was seen of the results of such inspections being uploaded into the central database.

24. All FeBOs inspected had implemented a HACCP plan, which was in the majority of cases checked during official inspections. Detailed assessment criteria for certain aspects of HACCP based procedures are described in national legislation. County inspectors demonstrated a good knowledge on how to assess the adequacy of the HACCP-plans. Nevertheless, at one FeBO visited, the inspector met identified significant shortcomings in the FeBO’s HACCP plan which had not been detected during previous inspections.

25. Homogeneity of mixing on feed is assessed during the approval of the feed manufacturers. National legislation on homogeneity has been adopted which includes the testing method and the assessment (see finding 6). After initial approval, no minimum frequency had been set up for homogeneity test, with examples seen at some of the FeBOs visited where this was done on a yearly basis in some cases whilst in others once every five years.

26. The competent authorities regularly control correctness of concentration of additives with maximum permitted levels established in EU legislation by sampling final products. In general, the FeBOs comply with the legislative limits. Nevertheless, in one instance, the audit team observed that the permitted level for vitamin A had been exceeded due to the operator having overlooked the newly lowered legislative limit for the specific animal species. This occurred despite the NFCSO having issued a circular letter providing information on the (reduced) maximum limit and the transitional period for implementations. The FeBO in question only amended the recipe four months after the end of the transitional period. This shortcoming had not been identified during the previous inspection.

27. The checklist developed by the central authority (see finding 20) contains specific questions on calibration and validation of measuring devices used mainly for the weighting of feed ingredients. Validation is performed by the National Office of Measurement and evidence was seen of this taking place. Calibration of metering devices is carried out regularly by FeBOs and county inspectors routinely and appropriately verified the calibration/validation of these devices during official inspections.

28. During official inspections county officials check the FeBOs' own controls for registering and processing consumer complaints. An example was seen for a withdrawal of contaminated feed additive from the market. The FeBO withdrew the total amount of the non-compliant product from the market and kept it under control in its storage
facility for further reprocessing. The audit team noted that the competent authority, at subsequent inspections, appropriately verified the effectiveness of the product withdrawal procedure and the control and re-processing of the contaminated feed additive.

5.2.1.3 TRACEABILITY

29. Traceability is an essential element of the official inspection procedures. During the audit, officials were able to demonstrate practical knowledge and understanding of how to assess FeBOs' traceability. At every establishment visited, the audit team observed how the inspectors successfully performed practical exercises to verify FeBOs' own traceability systems. This is in compliance with requirements laid down by Article 18 of Regulation (EC) No 178/2002 and Annex II of Regulation (EC) No 183/2005.

30. FeBOs kept all necessary documentation (e.g. product specifications, recipes, production sheets, labels, results of laboratory analysis of each batch of feed additives that were traded/ used for production, delivery documents) which ensured the complete traceability for feed additives and premixtures that was seen during the audit. This documentation was kept at least for the duration of the shelf-life of the products with examples seen of documents available for 3-5 years. This is in line with requirements of Annex II "RECORD-KEEPING" (2)(b)(i)(iii) of Regulation (EC) No 183/2005. This was in line with findings made by the competent authority.

31. The checklist prepared by the central authority contains questions on retained samples (i.e. those to be taken and kept by FeBOs from ingredients and final products manufactured) and these were regularly and appropriately verified during official control which could be confirmed by the audit team. The feed additive and pre-mixture producers visited had written procedures for retained samples and kept these samples generally 1-2 months longer than the end of the shelf-life of the products. The audit team randomly checked some of these samples, and in the majority of cases these were appropriately sealed, labelled and kept under control at dedicated storage places, with only one instance at a small capacity approved compound feed manufacturer visited, the FeBO had failed to keep retained samples from all ingredients used. The overall situation is in line with the requirements of Annex II "QUALITY CONTROL" (4) of Regulation (EC) No 183/2005.

5.2.1.4 LABELLING

32. Labelling is verified routinely during official inspections. Control and assessment of labelling is an essential part of the checklist developed by the central authority, which is in line with the requirements of Article 10(2)(b)(vi) of Regulation (EC) No 882/2004.

33. Whilst verification of labelling had been regularly carried out during previous county inspections, no non-compliances had been identified during such official controls. Despite this, the audit team was able to identify numerous and significant shortcomings on labelling at the majority of establishments visited. Examples of shortcomings were:
• The identification number of several feed additives not being present on the label, which is a legal requirement of Article 16(1)(f) of Regulation (EC) No 1831/2003.

• Identification of feed materials used as a carrier for feed additives production was not included on the labelling as required by Article 16(1)(b) of Regulation (EC) No 767/2009.

• Feed material being labelled as feed additive, which is not in line with the requirements of Article 15(a) of Regulation (EC) No 767/2009.

• Labels were seen for various premixtures from different producers stating that “the premix contains additional vitamins and micro-elements (beyond those listed) based on the agreement with the buyer and defined in the technical specifications (with no such detailed technical specification available)”. This is not in line with the requirements of Article 16(1)(a)(c) of Regulation (EC) No 1831/2003.

34. Furthermore, in some cases county inspectors could not explain how to assess the laboratory results of official samples related to control of declared concentrations (e.g. coccidiostats in a premixture for broilers, vitamin A in a pre-mixture for fattening pigs).

35. Despite the fact that training had been provided on the legal requirements of feed labelling (see finding 4), county feed inspectors were generally unable to apply this knowledge during official inspections, and thus to undertake their duties competently, (see finding 33 and 34) which is not line with requirements of Article 6(a) of Regulation (EC) No 882/2004.

### Conclusion on the planning and implementation of inspections

36. The planning of inspections for manufacturing FeBOs on the central and local level is risk-based. Nevertheless, the central planning of official controls on non-manufacturing FeBOs is lacking, therefore it cannot be ensured that official controls will be carried out on this type of operators in a harmonised way.

37. Regular and thorough verification of the FeBOs' own control and traceability systems strengthens the effectiveness of the official controls. However, significant weaknesses were seen on the verification of labelling requirements during official controls. The training provided does not support the official control staff to undertake their duties competently.

### 5.2.2 Sampling

#### 5.2.2.1 Planning of official sampling

38. The NFCSO develops the official sampling plan for feed. All the main feed safety hazards, as regulated by Directive 32/2002/EC, are included in the plan. The plan also
includes microbiological sampling parameters for feed based on national legislation (see finding 6) and quality parameters for feed ingredients with declared quantities for verification. The competent authority stated that RASFF notifications and European Food Safety Authority (EFSA) opinions are taken into account when developing the plan.

39. Generally, the plan does not give detailed instruction on specific feed materials to be sampled and the place of sampling – these are decided by the sampler based on technical and local knowledge. Nevertheless for some specific hazards, the plan does give more detailed instruction on the matrix to be sampled (e.g. GMO from rice or maize).

40. At least 80% of the official samples are taken at manufacturing FeBOs (both for ingredients and final products) and the rest are mostly taken from retailers and/or distributors. Sampling included feed where at least some of the ingredients had been imported from third countries. The majority of samples were taken at approved compound feed manufacturers.

41. The audit team showed several examples on how the competent authorities appropriately deal with non-compliances notified through the RASFF. One specific RASFF notification was studied in more detail by the audit team. It consisted of a premixture contaminated with high levels of non-dioxin-like polychlorinated biphenyls (PCBs) where Hungary was a recipient of the product. The documentation provided clearly demonstrated that the central competent authority carried out a successful investigation and withdrew and destroyed the contaminated batches from the Hungarian market. In the year of the notification, dioxins/PCBs in feed additives and/or premixtures were not included in the official sampling plan. The notification did not result in the inclusion of any samples to test for dioxins/PCBs in feed additives in the succeeding year. However, the central competent authority stated that they increased the number of dioxins/PCBs samples to be taken from compound feed.

5.2.2.2 IMPLEMENTATION OF OFFICIAL SAMPLING

42. The NFCSO has developed a guidance document on the practical implementation of official sampling in accordance with Commission Regulation (EC) No 152/2009. The total number of samples to be taken yearly is approximately 3,500. Since 2017, 60% of the samples are taken by the Food and Feed Safety Directorate of the NFCSO and 40% are taken by county feed inspectors. In all counties visited, around 90-95% of the approximately 3,500 planned samples for all types of feed (including raw materials and final products) were taken in the years 2016 and 2017.

43. In 2016, 516 official samples, of the around 3,500, were taken from feed additives and premixtures. The number of non-compliances was 19. All non-compliances related to quality issues (i.e. non-acceptable deviations from declared concentrations). The situation was very similar in 2017 (total number of samples 470, 9 non-compliances related to quality issues).
The audit team noted that, in spite of the centrally-developed guidance document on the practical aspects of official sampling (see finding 42) and training provided (see finding 4) on the legal requirements of official sampling, county feed safety inspectors, as opposed to the performance of official sampling carried out by the Food and Feed Safety Directorate of the NFCSO, were not aware of the guidance document with the result of them failing to follow the requirements on official sampling laid down by Commission Regulation (EC) No 152/2009. This calls into question the appropriateness of the training provided under the requirements of Article 6(a) of Regulation (EC) No 882/2004.

All official samples are sent for analysis to official laboratories, which are designated in accordance with the requirements laid down by Article 12 of Regulation (EC) No 882/2004. The NFCSO issued a circular letter including the list of the official laboratories to where the different feed samples must be sent for analysis.

Official laboratories communicate the results of the analysis to the county for where sampling took place within four weeks (turnaround time) from the moment the sample arrives at the laboratory. In the counties visited, the turnaround time was respected by the laboratories. The central competent authority stated that in case of serious issues (e.g. related to RASFF notifications), the turnaround time can be significantly reduced.

**Conclusion on the planning and implementation of sampling**

47. The system in place for planning of official sampling is risk-based. However, the legal and analytical validity of official sampling is weakened by systematic deficiencies on the implementation of official sampling by county feed safety inspectors thus, severely undermining the effectiveness of the official sampling system. The training provided does not support county officials to undertake their duties competently.

**5.2.3 Actions taken on non-compliances**

48. The audit team received information on the centrally draft procedures to be followed by competent authority officials in case of non-compliance. When non-compliances are identified in the official report, the FeBO has to provide an action plan to address the shortcoming within an agreed deadline. County officials are responsible for the assessment of the action plan provided by the FeBOs. If the assessment is not favourable, or were serious non-compliances had been found (e.g. several non-compliances, deficiencies relating to feed safety) specific follow-up inspection are carried out focusing on the implementation of the FeBO's action plan. If the case of minor shortcomings, the follow-up is carried out during the next inspection.

49. Non-compliances were identified in 15% and 13% of the official inspection reports relating to manufacturing and placing on the market of feed additives and premixtures in 2016, and 2017 respectively. The identified non-compliances mainly related to hygiene
problems with facilities and equipment; a second groups of non-compliances related to FeBOs' own controls with only a few instances where non-compliances were raised linked to labelling and traceability issues.

 County officials have the statutory power to impose fines whose size depends on the seriousness of the non-compliance. A detailed calculation method of the fine is described in national governmental legislation No 94/2008 (VII. 31.)

**Conclusion on actions taken on non-compliances**

51. Actions taken on non-compliances are effective, proportionate and dissuasive.

**5.2.4 Establishments producing/trading non-authorised (in the EU) feed additives but are exporting or re-exporting them from the EU to a non-EU country**

52. The audit team visited two different FeBOs producing and exporting non-authorised (in the EU) feed additives and/or premixtures to non-EU countries. None of the two FeBOs could demonstrate that the competent authority of the receiving non-EU countries had been informed of the reason for which and the circumstances in which the feed concerned could not be placed on the EU market, and no evidence was available as to their agreement to the import of such products into their countries. The Hungarian central competent authority could neither provide the necessary assurances, as there is no procedure in place to verify compliance with the requirements of Article 12 of Regulation (EC) No 178/2002, as thus, officials had never carried out controls on this specific matter.

**Conclusion on establishments producing/trading non-authorised (in the EU) feed additives but are exporting or re-exporting them from the EU to a non-EU country**

53. Official controls do not verify that, in case of export of non-authorised (in the EU) feed additives, the authorities of importing non-EU countries are informed of the reasons for which and the circumstances in which the feed concerned could not be placed on the EU market, nor that they had expressly agree to place such products into their countries.

**6 OVERALL CONCLUSION**

Planning of the official controls (inspections and sampling) is risk-based; its implementation is supported by adequate national legislation and guidance.

The competent authority has got a risk based control plan for official inspections and sampling covering feed additives, their ingredients and traceability. A robust system is in place for follow up actions in cases of non-compliances. Nevertheless, the effectiveness of official controls is weakened by deficient official sampling by county inspectors and on the
verification of labelling requirements during official controls. The training provided does not support the official control staff to undertake their duties competently.

Official controls do not verify that, in case of export of non-authorised (in the EU) feed additives, the authorities of importing non-EU countries are informed of the reasons for which and the circumstances in which the feed concerned could not be placed on the EU market, nor that they had expressly agree to place such products into their countries.

7 CLOSING MEETING

A closing meeting was held on 28 March 2018 with the representatives of the Ministry of Agriculture and the National Food Chain Safety Office. The main findings and preliminary conclusions of the audit were presented by the audit team. The authorities present did not indicate any major disagreement with these.

8 RECOMMENDATIONS

The competent authorities are invited to provide details of the actions taken and planned, including deadlines for their completion ('action plan'), aimed at addressing the recommendations set out below, within 25 working days of receipt of this audit report.

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<tr>
<td>1</td>
<td>To ensure that officials preforming official controls are appropriately trained, in particular as regards official sampling and assessment of labelling, as required by Article 6(a) of Regulation (EC) No 882/2004.</td>
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<td></td>
<td>Recommendation based on conclusion: 37, 47</td>
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<td>Associated findings: 4, 35, 44</td>
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<td>2</td>
<td>To ensure that official staff carrying out official sampling follow the sampling requirements laid down by Annex I of Regulation (EC) No 152/2009.</td>
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<td>Recommendation based on conclusion: 47</td>
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<td>Associated findings: 44</td>
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<tr>
<td>3</td>
<td>To ensure that feed business operators meet the labelling requirements as required by Article 16 of Regulation (EC) No 1831/2003 and Article 15 of Regulation (EC) No 767/2009.</td>
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<td>To ensure that feed business operators, placing non-authorised (in the EU) feed additives/premixtures on non-EU countries' market, meet the requirements laid</td>
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The competent authority's response to the recommendations can be found at:

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