EUROPEAN COMMISSION
HEALTH AND CONSUMERS DIRECTORATE-GENERAL

Directorate F - Food and Veterinary Office

DG(SANCO) 2013-6866 - MR FINAL

# FINAL REPORT OF AN AUDIT

# CARRIED OUT IN

# BOTSWANA

# FROM 04 TO 11 MARCH 2013

# IN ORDER TO EVALUATE THE OPERATION OF CONTROLS OVER THE PRODUCTION OF FRESH BOVINE MEAT DESTINED FOR EXPORT TO THE EUROPEAN UNION, AS WELL AS CERTIFICATION PROCEDURES

## *Executive Summary*

*The report describes the outcome of an audit carried out by the Food and Veterinary Office (FVO) in Botswana from 4 to 11 March 2013. The objectives of the audit were to evaluate the measures taken by the Botswana authorities to address the recommendations contained in the FVO report DG(SANCO)/2011-6119 (hereafter report 2011-6119) and thereby to evaluate the operation of public health controls, including certification procedures, over the production of fresh bovine meat for human consumption destined for export to the European Union (EU). The audit was combined with the audit DG(SANCO)/2013-6792, which reviewed the animal health controls.*

*Significant improvements have been made by the Botswana authorities regarding the identification and registration system of bovine animals. The central bovine database has been further developed to guarantee 40 day residence on the last holding before slaughter and the 90 day residence in an EU approved part of the territory. Only those bovine animals are accepted for EU slaughter originating from feedlots and fenced farms. The attestations contained in the movement permits and the farmers' declaration, provide equivalent guarantees to the food chain information. Central loading areas, which are comparable with assembly centres, are no longer used for sending EU eligible cattle to EU approved slaughterhouses. A number of deficiencies which were identified, in particular related to the discrepancies between the registration of animals in the Livestock Identification and Traceability System (LITS) compared with the actual animals present at livestock holdings, or those who died or were slaughtered as well as the absence of official controls on the registration of cattle and no supervisory controls on movements weaken the reliability of the system.*

*The Botswana authorities have ensured that the two establishments listed for export of bovine meat to the EU fulfil the requirements of Article 12.2 of Regulation (EC) No 854/2004. A few non-compliant issues were raised during this audit regarding general and specific hygiene requirements, which could easily be addressed. The Central Competent Authorities (CCA) did not address however, the concerns raised in the previous report 2011- 6119 regarding microbiological criteria for sampling of carcasses. The Competent Authority (CA) remains weak in their evaluation of microbiological criteria for foodstuffs as well as the follow-up of non-compliant microbiological test results. In one establishment in particular, the test results for carcass sampling are regularly positive for Salmonella without adequate corrective actions being taken by either the food business operator (FBO) or the CA. No export of beef to the EU took place from this establishment after it had been re-listed. The meat product establishment which was de-listed by the CCA after the previous audit 2011-6119 is still not compliant with the relevant EU requirements and significant investment is needed to upgrade the establishment in order to meet the EU standards.*

*The CCA provided the officials with adequate training on official controls but failed to provide adequate training regarding testing against microbiological criteria as laid down in Regulation (EC) No 2073/2005. The training provided has strengthened the performance of official controls.*

*The Botswana authorities ensured that certifying officers comply with the requirements of Article 3 of Council Directive 96/93/EC in particular that they do not certify data for which they have no knowledge or which could not be ascertained by them. A few issues were raised during this audit regarding certification, in particular the issuing of replacement certificates.*

*The Botswana authorities put in place a requirement for farmers to keep records of treatments with veterinary medical products in order to provide guarantees that are at least equivalent to those required by Article 10 of Council Directive 96/23/EC. This requirement is insufficiently enforced through official controls and was not in place at holdings in communal grazing areas. The CA took adequate measures after having identified that feedlots were using feed medicated with monensin and salinomycin. The CA traced back consignments of bovine meat after having detected the use of cimaterol (beta-agonist), but had not yet initiated investigations at the feedlot of origin.*

*A number of recommendations have been made to the CA with a view to addressing the deficiencies identified during this audit.*

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## Abbreviations and definitions used in this report

| Abbreviation | Explanation |
|---|---|
| BNVL | Botswana National Veterinary Laboratory |
| CA(s) | Competent Authority(ies) |
| CCA(s) | Central Competent Authority(ies) |
| DG(SANCO) | Health & Consumers Directorate General |
| DVS | Department of Veterinary Services |
| EC | European Community(ies) |
| EU | European Union |
| FBO(s) | Food Business Operator(s) |
| FVO | Food and Veterinary Office |
| HACCP | Hazard Analysis of Critical Control Points |
| LITS | Livestock Identification and Traceability System |
| RFID | Radio- Frequency Identification |

## 1 Introduction

The audit took place in Botswana from 4 to 11 March 2013 as part of the planned audit programme of the FVO. The audit team comprised two inspectors from the FVO. This was a joint audit with the planned audit DG(SANCO)/2013-6792, which reviewed the animal health controls.

The FVO audit team was accompanied by representatives from the CCA, the Department of Veterinary Services (the DVS).

The opening meeting was held on 4 March 2013 with the CCA in Gabarone. At this meeting the FVO audit team confirmed the objectives of, and itinerary for the audit, and additional information required for the satisfactory completion of the audit was requested.

## 2 Objectives

The objectives of the audit were to evaluate the measures taken by the Botswana authorities to address the deficiencies, the conclusions and recommendations of the previous FVO audit reports, in particular report 2011-6119 and thereby to evaluate the controls in place for export of fresh bovine meat to the EU.

The scope of the audit covered the official controls and certification of fresh bovine meat intended for export to the EU.

The FVO audit team in particular:

- reviewed the systems for certification of animals and bovine meat in relation to the requirements of Council Directive 96/93/EC;
- reviewed the system for the control and recording of animal movements, including those controls necessary for certification in accordance with the requirements of Commission Regulation (EU) No 206/2010;
- assessed the controls in place over the production of fresh bovine meat, including those controls necessary for certification in accordance with the requirements of respectively Commission Regulation (EU) No 206/2010, Council Directive 2002/99/EC and Commission Decisions 2007/777/EC and 2000/572/EC.

In particular, controls over bovine meat in the framework of Regulations (EC) No 178/2002, No 852/2004, No 853/2004, No 854/2004 and No 882/2004 as well as Council Directive 97/78/EC were subject to this evaluation. In pursuit of these objectives, the audit itinerary included the following:

| COMPETENT AUTHORITIES | | | Comments |
|---|---|---|---|
| Competent Authorities | Central | | Opening and Final meeting |
| | Regional | | |
| | Local | | |
| **FOOD PRODUCTION / PROCESSING / DISTRIBUTION – ACTIVITIES** | | | |
| Slaughterhouses | | 2 | |
| Cutting premises | | 2 | |
| Meat product establishments | | 1 | |

| COMPETENT AUTHORITIES | | Comments |
|---|---|---|
| Cold stores | 1 | |
| Bovine farms | 5 | Three feedlots, one fenced farm and one communal grazing area |
| A movement permit issuing point for bovine animals | 1 | Central loading facility |
| Database | 1 | The central database as part of the LITS |

## 3 Legal Basis

The audit was carried out under the general provisions of EU legislation and, in particular Article 46 of Regulation (EC) No 882/2004 of the European Parliament and of the Council on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules.

*N.B. Full legal references are provided in Annex 1. Legal acts quoted in this report refer, where applicable, to the latest amended version.*

## 4 Background

The previous audit concerning the safety of food of animal origin in Botswana was carried out from 25 to 28 January 2011, the results of which are described in report 2011-6119. This report is accessible at: http://ec.europa.eu/food/fvo/ir_search_en.cfm

As a result of the previous audit 2011-6119, the Botswana authorities withdrew the approval of all listed meat and meat product establishments for export of beef and meat products for the EU.

The Botswana authorities proposed the relisting of two establishments after their action plan received by the FVO provided satisfactory guarantees in response to all of the report's recommendations. The meat product establishment has not been relisted.

### 4.1 Export statistics

In 2012, 776 tonnes of fresh bovine meat was exported from Botswana to the EU from one establishment only.

## 5 Findings And Conclusions

### 5.1 Follow-up of the CA guarantees to recommendation no 1 of the previous report 2011-6119

"*To put in place documented procedures and relevant official controls in order to guarantee that only eligible animals are slaughtered for export to the EU and in particular, that the conditions of point II.2.2 and II.2.3 of the export certificate "BOV" as laid down in Commission Regulation (EU) No 206/2010 are met".*

Findings

The CCA has guaranteed a number of actions to be implemented in order to address this recommendation. It concerns the stepwise registration of feedlots, fenced farms and communal grazing areas. The LITS using a Radio- Frequency Identification (RFID) reticulum bolus will continue to be used as an individual identification means for cattle in order to control the 90 day residence period in the EU approved zones and the 40 day residence period on the last holding before being sent for slaughter and movements. Movement permits are issued for cattle moving to and from feedlots and fenced farms at the holdings concerned. For communal grazing areas movement permits will be issued at central loading facilities for animals sent for slaughter. The feedlots, fenced farms and communal grazing areas must keep records of on-farm activities such as registration of animals and their residence period, veterinary medicine treatment records and feed management records.

The movement permits have been reviewed and a farmer declaration for cattle destined for European approved export establishments has been established.

The CCA guaranteed that legislation on animal identification and traceability will be reviewed by 30 September 2011, but legislation is still not adapted.

The CCA stated that communal grazing areas are excluded at present to send cattle directly for EU slaughter. The cattle can be supplied to feedlots and fenced farms through central loading facilities.

Observations

*Regarding registration of holdings*:

- Minimum requirements for the registration of feedlots and fenced farms have been established, but not for communal grazing areas. Keepers must apply for registration, which is followed by an official verification visit. Three reports of verification visits (for the two feedlots and one fenced farm visited) have been verified and all three reports were not conclusive. Moreover the three reports revealed that the holdings were not compliant with the minimum requirements, but the CCA granted a unique registration number, which is valid for one year. The owner must apply for renewal.
- The renewal of registration was not supported by a verification visit and the CA could not demonstrate that minimum control visits had been established for feedlots and fenced farms. Both feedlots were only audited once by the CA since their registration in 2011. There was a significant delay in providing the audit report to the operators containing non-compliant findings and the recommendations (up to six weeks). No reports were made on the verification of the operators' proposed corrective actions.
- At present 21 feedlots and 194 fenced farms are registered in the LITS with a unique number.
- The 40 day residence period of cattle on the last holding before slaughter is now interpreted as being 40 days present at the last feedlot or fenced farm after the registration in the LITS database of the arrival of the cattle to these holdings.
- Both feedlots visited have separated pens for 40 and 90 day residence periods as well as isolated sick pens. The fenced farm visited had no dedicated isolated sick pen although this is a requirement for registration.
- The CCA had not established requirements for central loading facilities. Animals which are brought from the communal grazing areas are gathered at loading facilities for sale to potential buyers. Animals which are not sold return to the communal grazing areas without a movement permit and without being recorded as having passed through the central loading

facilities.

*Regarding identification and registration of cattle*:

- The system of animal identification, including for imported animals and the procedure to recover and re-use the reticulum bolus remains as described in the previous report 2011-6119.
- The CCA stated its intention to move towards a double ear tagging system with one RFID tag and one visual tag. A transitional period will be introduced for animals with a bolus inserted (bolus plus visual tag). No deadlines could be provided.
- Animals with a reticulum bolus inserted are registered in the central database. The owner receives a LITS rollout report containing the registration of the cattle with their bolus identification number, bolus insertion date and crush where the bolus was entered, colour of the cattle, the owners' hot brand mark and position on the cattle.
- The operator of feedlots must report the arrival of animals in their feedlots within 48 hours of arrival and the fenced farm operators within 14 days. The animals are then verified by the official and registered in the LITS. Once the animals have been registered as being present at the feedlots or fenced farms, the 40 or 90 day residence period starts. It is common practice that feedlot operators notify the arrival of the animals once pens are filled up, which may take up to one week after the arrival of the first animals.
    - No follow-up has been initiated for animals for which a movement permit has been issued, but which no notification has been made by the operator of the next destination.
    - Four out of five animals which were sent from a feedlot with a movement permit to a non-EU approved slaughterhouse, were still recorded as being present at the feedlot; the fifth animal was recorded as having been moved from the feedlot but without arrival at the slaughterhouse.
- The three feedlots visited have their own management system and animals are tagged upon arrival with an ear tag containing a feedlot management number. This number is linked in the feedlots' records to the individual identification number.
    - In one feedlot visited the same management number was linked to two different identification numbers and another management number was not linked to an individual identification number.
    - In a second feedlot visited, 996 cattle were recorded at the feedlot as being present on 18 February 2013 in two pens. Only 994 animals were recorded in the LITS as being identified as present on that date.
    - In a third feedlot the animals that were isolated in the sick pens before the official registers the arrival of the group of animals in the LITS are not recorded in the LITS.
    - Animals for which the bolus cannot be read before sending for slaughter were excluded from the EU eligible batch.

*Regarding movement controls*:

- The movement of animals is controlled between zones by means of issuing movement permits. Since the previous audit 2011-6119 movement permits are also mandatory for cattle movements to and from registered feedlots and fenced farms and for cattle moving to EU approved slaughterhouses.
- The CCA stated that 96% of the movement permits are issued electronically. This is a huge

improvement since the previous audit 2011-6119. It contains information on the date of the issuing of the permit, the permit reference number, the destination (EU or other markets), the species, the place where the individual identification of the animals are read (name of feedlot, fenced farm or for common grazing area the name of the cattle crush), the destination, its validity dates, the total number of animals moved and the number of the transponders.

- In addition to the electronic movement permit, an animal movement permit is issued containing attestations regarding animal identification and 90/40 day residence period requirements, an animal health situation after clinical inspection, details of the vehicle registration, cleaning and disinfection before loading and the official seal numbers. It refers to the electronic movement permit and for imported or feedlot animals to the import permit or incoming movement permit and to the declaration of the farmer for cattle destined for slaughter for EU export.
    - For one movement permit verified, for the 34 animals moved, the reference of the incoming movement permit covered 5 animals only. The 29 other animals that arrived at the feedlot were covered by other reference numbers.
    - The movement permits did not refer in all cases to the electronically issued movement permit number and/or to the farmer's declaration.
- No supervisory controls have been established by the CCA to verify the correct issuing of movement permits or to verify control procedures in place.

*Regarding the LITS:*

- Veterinary services at slaughterhouses have access to the LITS in order to verify the residence period. This is also applicable for the district veterinary services issuing movement permits.
- The LITS provides information on the number of days of residence in the last holdings since its registration.
- There are still no direct links established to the central database at significant points where reading of bovine animals takes place e.g. cattle crushes, district office, central loading points, slaughterhouses and feedlots in order to register directly on-line the identification of animals and their movements. Exchange of information is now available at the district veterinary offices, which reduced significantly the delay in up-dating the data in the LITS.
- At slaughterhouses it was noticed that on several occasions animals contain more than one bolus. In the cases verified, the database recorded slaughter of the animal for only one reticulum bolus identification number.
- The central database allows for the verifying of the movement history of the individual animals. The query on the history of the identification numbers checked from a few animals registered in a communal grazing area in the surveillance zone (not allowed for EU slaughter) resulted in the same animal with another identification number present in another zone and eligible for EU slaughter.
- It was demonstrated that the LITS allows the issuing of movement permits for cattle from a communal grazing area in the surveillance zone to be sent for EU slaughter.
- No supervisory controls have been established by the CCA to verify the operation of the central database or to verify control procedures in place.

Conclusion

*S*ignificant improvements have been made by the Botswana authorities regarding the identification and registration system of bovine animals since the previous audit 2011-6119. The central bovine database has been further developed to guarantee the 40 day residence on the last holding before slaughter and the 90 day residence in an EU approved part of the territory. Only those bovine animals originating from feedlots and fenced farms are accepted for EU slaughter. The attestations contained in the movement permits and the farmers' declaration, provide equivalent guarantees to the food chain information. Central loading areas, which are comparable with assembly centres, are no longer used for sending EU eligible cattle to EU approved slaughterhouses. A number of deficiencies which were identified, in particular related to the discrepancies between the registration of animals in the LITS compared with the actual animals present at livestock holdings, or those who died or were slaughtered as well as the absence of official controls on the registration of cattle and no supervisory controls on movements weaken the reliability of the system.

### 5.2 Follow-up of the CA guarantees to recommendation no 2 of the previous report 2011-6119

"*To ensure that establishments listed for export to the EU fulfil the requirements of Article 12.2 of Regulation (EC) No 854/2004".*

Findings

In response to recommendation no 2, the CCA guaranteed that the Establishment Approval Office was to be strengthened ensuring that during auditing by the CA and CCA, compliance with EU requirements is achieved. A procedure for Inspection and Auditing Meat Establishments was developed as well as a checklist for conducting audits verifying FBOs' compliances.

Observations

- The above mentioned procedures and checklist were in place and used for conducting audits at the two slaughterhouses visited.
- The FVO audit team verified the approval of one slaughterhouse visited. Audits were carried out by official veterinarians from central and local level. The FBO has been provided with audit reports containing the scope, findings, conclusions and recommendations for the audit findings. The FBO has been requested to provide action plans in order to address the recommendations and verification of the guarantees took place on-the-spot. Once results of the audits were satisfactory, an approval has been granted by the CCA. The approval is valid for one year and lists the activities, the throughput, the species and approved market.
- Once approved, audits are carried out by the local official veterinarian at a set frequency. The FBO receives the reports of the audit findings and is requested to provide an action plan and the guarantees are verified on-the-spot.
- The FVO audit team observed a number of issues, which had not been reported in the latest reports of audits carried out by the CA in the two slaughterhouses visited:

*Regarding general and specific hygiene requirements*:

- In one slaughterhouse, one part of the overhead structures of the slaughter line was not well maintained and contained rust and old paint, the slope of the rail was too steep resulting in an accumulation of carcasses (with potential cross contamination).
- Both slaughterhouses did not have adequate facilities for the inspection of feet and mouth.
- In both slaughterhouses the platforms were at some places not properly cleaned and

corrosion as well as algae growth was visible. Water was at certain points not positively conducted and there was pooling of water in some places.

- In one slaughterhouse, water was sprayed into the anal area after stunning, increasing potential contamination of carcasses during the dehiding process. The dehiding was not carried out in a hygienic way at several process steps, whilst in the second slaughterhouse this was limited to one process step.
- In one cutting plant adjacent to the slaughterhouse there was extensive spillage of bone-dust over the forequarters of carcasses and the meat of the neck was swept through the bone dust. A similar procedure was in place in the second establishment visited. This point was not addressed by the FBOs and causes a potential risk of contamination of bone fragments in meat, in particular trimmings intended for export to the EU. The FBOs stated that trimmings and meat from forequarters had not been exported to the EU so far.

*Regarding HACCP:*

- The procedures describing sampling of carcasses with the non-destructive method were missing on file. The corrective action to be taken in case of positive results for *Salmonella* or when the Aerobic colony count or *Enterobacteriaceae* exceed the maximum limit of acceptance was not fully in line with the requirements set out in Regulation (EC) No 2073/2005. These requirements are not implemented by the FBO (see test results in the section on microbiological sampling).
- In one slaughterhouse the FBO has established procedures for testing the shelf life of fresh meat. Tests were carried out in 2010, but were not in line with the FBO's procedures and were not concluded. The tests were only performed on chilled bovine meat and did not cover the entire period.

*Regarding microbiological sampling*:

- At one slaughterhouse the results of microbiological sampling carried out by the Botswana National Veterinary Laboratory (BNVL) were not comparable with the results of the FBO's in-house laboratory. In 2012 103 out of 510 carcass samples were found to be positive for *Salmonella* and none by the FBO. A significant difference in results was also noted for results of Aerobic colony count or *Enterobacteriaceae.*
- A few observations were noted by the FVO audit team in the reporting of test results by the BNVL e.g. date of sampling was reported after the date of test results; *Salmonella* test results for the non-destructive method are reported as not/detected in 700 cm², whilst the sample forms do not contain information on the surface swabbed. The test results are not communicated in due time. For example, reports indicated that tests were carried out on 4 February 2013 whilst the results were only forwarded on 28 February 2013.

*Regarding post mortem inspection:*

- In both establishments the feet and mouth were not properly inspected: feet were not well cleaned and the mucosa and tongue were not correctly inspected.

*Regarding animal welfare*:

- The set limit in the FBOs' procedure for using instruments administering electric shocks was 25%. This does not address the requirement laid down in point 1.9 of Annex III to Regulation (EC) No 1099/2009 stating that the use of such instruments should be avoided as far as possible. The FBOs' verification records showed that these instruments were rarely used.

Conclusion

The Botswana authorities have ensured that the two establishments listed for export of bovine meat to the EU generally fulfil the requirements of Article 12.2 of Regulation (EC) No 854/2004. A few non-compliant issues were raised during this audit regarding general and specific hygiene requirements, which could easily be addressed. The CCA did not address however, the concerns raised in the previous audit report 2011-6119 regarding microbiological criteria for sampling of carcasses. The CA remains weak in their evaluation of microbiological criteria for foodstuffs as well as the follow-up of non-compliant microbiological test results. In one establishment in particular, the test results for carcass sampling are regularly positive for *Salmonella* without adequate corrective actions being taken by either the FBO or the CA. No export of beef to the EU has taken place from this establishment after it was re-listed. The procedures in place for de-boning meat do not guarantee that the production of EU eligible boneless meat obtained from forequarters and trimmings is hygienic and free from bone dust and fragments.

### 5.3 Follow-up of the CA guarantees to recommendation no 3 of the previous report 2011-6119

"*To ensure that meat products produced for export to the EU are produced from fresh meat eligible for export to the EU and in particular fulfilling the conditions of points II.1.2.1 and II.2.1 and II.2.2 of the export certificate as laid down in Annex III to Commission Decision 2007/777/EC".*

Findings

The CCA provided updated information at the initial meeting regarding the meat product establishment. The approval of the meat product establishment was withdrawn for export to the EU after the previous audit 2011-6119. The FBO informed the CCA in their letter dated 24 April 2012 that they did not wish to seek EU approval for the cannery at that time. The CCA stated that the meat product establishment is currently not compliant with the relevant EU requirements.

Observations

The FBO stated that the meat product establishment would be upgraded within a period of two to four years. As described in the previous report 2011-6119, the facilities and certain equipment of the meat product establishment are not maintained. There is potential cross-contamination due to the lay-out (routing of staff, flow of products, ingredients and other materials).

Conclusion

The meat product establishment which was delisted by the CCA after the previous audit 2011-6119 is still not compliant with the relevant EU requirements. Significant investment is needed to upgrade the establishment in order to meet EU standards.

### 5.4 Follow-up of the CA guarantees to recommendation no 4 of the previous report 2011-6119

"*To provide the officials with adequate training relating in particular to controls on HACCP based procedures, including testing against microbiological criteria as laid down in Regulation (EC) No 2073/2005, traceability of beef and bovine animals and in particular guarantees for the 90/40 day residence requirements for cattle intended for slaughter for the EU certification procedures as laid down in the Directive 96/93/EC and he particular requirements of the BOV export certificate as laid down in Regulation (EU) No 206/2010".*

Findings

The CA responded to this recommendation that training was planned for official staff involved in certification of beef and beef products. The training included controls over traceability systems, relevant EU Directives and Regulations, HACCP systems, principles of certification based on Council Directive 96/93/EC, Regulation (EC) No 2073/2005 and model certificate "BOV". At the opening meeting, the CA stated that all certifying officers have been trained.

Observations

- The official veterinarians, who were interviewed regarding training, had all attended the "official controls and audit course" and all received an appointment as certifying officers after having completed the "certifying officers course".
- The content of the course covered controls over traceability systems, relevant EU legislation, certification principles and requirements laid down in model certificate "BOV", including the residency requirements, animal movements and animal welfare.
- There was no evidence that the training courses covered controls on microbiological criteria for foodstuffs.

Conclusion

The CCA provided the officials with adequate training relating to official controls but failed to provide adequate training regarding testing against microbiological criteria as laid down in Regulation (EC) No 2073/2005. The training provided has strengthened the performance of official controls.

### 5.5 Follow-up of the CA guarantees to recommendation no 5 of the previous report 2011-6119

"*To ensure that certifying officers comply with the requirements of Article 3 of Council Directive 96/93/EC in particular that they do not certify data of which they have no knowledge or which could not be ascertained by them*".

Findings

The CCA responded to this recommendation that a procedure for issuing export health certificates at abattoirs has been established for verification of data and records before certificates could be signed by the official veterinarian and performance audits of official controls will be conducted.

Observations

- With reference to the guarantees provided to recommendation 4, official officers have been trained and appointed for signing certificates or other official documents as part of the traceability chain of bovine meat such as movement permits.
- The procedure for issuing health certificates at abattoirs also contain provisions for replacement certificates. It does, however, not require the return of the original certificates if a replacement certificate has been issued.
- At one slaughterhouse visited, the FBO issued the certificate numbers and not the official veterinarian which is contrary to point (i) of Annex V to Regulation (EC) No 206/2010. Records verified indicated the cancellation of two certificates, however the cancelled certificates could not be provided.
- At this slaughterhouse visited, the official veterinarians were familiar with the traceability system for bovine meat and the issuing of health certificates and could confidently

demonstrate trace back of one selected consignment exported to the EU in July 2012 to the holdings of origin.

Conclusion

The Botswana authorities ensured that certifying officers comply with the requirements of Article 3 of Council Directive 96/93/EC in particular that they do not certify data for which they have no knowledge or which could not be ascertained by them. A few issues were raised during this audit regarding procedures for certification, in particular the issuing of replacement certificates.

### 5.6 Follow-up of the CA guarantees to recommendation no 6 of the previous report 2011-6119

"*To ensure that records are kept on farms of treatments with veterinary medical products in order to provide guarantees at least equivalent to that required by Article 10 of Council Directive 96/23/EC".*

Findings

The CCA responded to this recommendation that farmers are obliged to keep a stock card, recording treatments with veterinary medicinal products. Legislation will be reviewed to oblige farmers to maintain a register of animal treatments. Movement of cattle for slaughter is prohibited if the withdrawal period is not respected.

The CCA prohibited the use of salinomycin and its derivatives on 5 September 2012 for animals destined for food production after having identified that feedlots use feed containing monensin/salinomycin.

Observations

- At the feedlots visited, records of treatments of animals with medical products are kept. However, at one feedlot visited for one product verified, there was no reconciliation between the amount of veterinary product delivered and the amount of products administered. Identification of treated animals was not possible for some treatments. For other treatments, products were used for which no veterinary description was available (e.g. products to treat mastitis were used to treat eye infections) and no withdrawal period was mentioned in the records. Products were present at the holding for eye treatments, but no withdrawal period was available although it contained antibiotics.
- The official controls at both feedlots visited, included controls on records of use of veterinary medical products. The team did not see any evidence of such controls through control reports for the fenced farm visited. Regarding the frequency of official controls at feedlots and fenced farms, see point 5.1 of this report.
- The FVO audit team was informed by the district veterinary office visited, that visits at registered feedlots took place after identifying the use of monensin/salinomycin in feed at one specific feedlot. No reports were made containing the results of these control visits. The district veterinary office notified the CCA and the feedlots concerned received an official letter from the CCA that the affected animals could not be considered as EU eligible. The official veterinarian did not record the number of animals and their individual identification number which were treated with feed containing monensin/salinomycin. It was left up to the FBO of the slaughterhouse to decide which animals could be considered as being EU eligible.
- The operators at both feedlots visited certified that the first groups of animals moved for slaughter for markets other than the EU after September 2012 have not been treated with

prohibited substances whilst evidence at the veterinary district offices, who issued movement permits, was present that the animals have been treated with monensin/salinomycin at both feedlots. The FVO audit team did not have evidence that affected cattle at the feedlots, which were present at the holdings at the moment of the introduction of the ban, were sent thereafter for slaughter for the EU.

- At one feedlot visited, the district veterinary office visited did not make a final decision for the feed containing monensin/salinomycin which is still present at the feedlot in a sealed storage place.
- At the one backyard holding visited, which was located in a communal grazing area, the owner stated that no veterinary medicine records are kept. The owner stated to regularly treat its animals against ticks and flies.

Conclusion

The Botswana authorities put in place a requirement for farmers to keep records on treatments with veterinary medical products in order to provide guarantees that are at least equivalent to those required by Article 10 of Council Directive 96/23/EEC. This requirement is insufficiently enforced through official controls and was not in place at holdings in communal grazing area.

### 5.7 Follow-up of the CA guarantees to recommendation no 7 of the previous report 2011-6119

"*Ensure in cases where there is suspicion that carcasses may contain residues of veterinary medicines that measures are put in place in order to give guarantees with an effect equivalent to those foreseen by Article 24 of Council Directive 96/23/EC".*

Findings

The CA responded to this recommendation that procedures will be developed to guide the official veterinarian on action to take on suspicion of residues of veterinary medicines. It is expected by the CCA that once the samples are with the contracted testing external laboratory, residue testing results will be expected in four weeks. Records of events of non-compliance at all levels of official controls are to be kept.

Observations

- At one slaughterhouse visited, the official veterinarian initiated targeted residue sampling only after discussion with the FVO audit team. The carcasses of two animals subsequently slaughtered originating from the same feedlot showed a purulent abscess in a similar part of the body.
- In both slaughterhouses detained carcass chiller rooms are present and in one slaughterhouse where verified, in the cold store rooms for final packed products lockable facilities for quarantined products are present.
- Four samples of various tissues (meat, liver, kidneys, fat, urine and blood) were taken at random for testing for residues of veterinary medical products respectively on 5 and 11 July, and 8 and 29 August 2012 as part of the national residues monitoring plan. The products groups were not specified in the sampling form.
- The District Veterinary Office sent the samples to the BNVL on the same date of sampling. The BNVL sent the samples to the contracted laboratory and results were received by the BNVL respectively on 31 January and 6 February 2013. The BNVL only sent the test results to the District Veterinary Office on 28 February 2013. Three of the four samples tested

screened positive for monensin and one of them also for salinomycin. The fourth sample screened positive for cimaterol (which belongs to the group of β-agonists). The confirmatory tests which show the actual concentration of the drug is pending.

- The District Veterinary Offices requested the FBO of the slaughterhouse for detailed information on the consignments affected. No initiative has yet been taken to start an investigation regarding the screened positive finding on cimaterol in the feedlot concerned.
- Another delay in forwarding test results from the BNVL to the District Veterinary Office was noted by the FVO audit team regarding forwarding results of targeted sampling on residues. The BNVL received test results on 31 January 2013 and the results were forwarded to the District Veterinary Office on 14 February 2013.

Conclusion

The Botswana authorities have developed procedures to ensure in cases where there is a suspicion that carcasses may contain residues of veterinary medicines that measures are put in place in order to give guarantees with an effect equivalent to those foreseen by Article 24 of Council Directive 96/23/EC. In a recent case seen, there was a delay in providing test results from the Botswana BNVL to the local level and the action initiated at local level was incomplete. The procedures for forwarding samples and receiving the test results from a contracted laboratory, which were taken in the frame of the National Residues Monitoring Programme result in a huge delay in starting investigations where positive test results have been obtained.

## 6 Overall Conclusion

The Botswana authorities made a huge effort to strengthen the official controls since the last FVO audit in Botswana in 2011. The two listed establishments meet in general the relevant EU requirements. The CCA did not address however, the concerns raised in the previous audit report 2011-6119 regarding microbiological criteria for sampling of carcasses. Non-compliant microbiological test results of carcass samples were not followed up by either the FBO or the CCA in order to improve the slaughter hygiene.

The CCA now has the capacity to provide guarantees to meet the relevant public health requirements of the export certificate “BOV” as laid down in Commission Regulation (EU) No 206/2010 and trace back of bovine meat to the holding of origin as well as to the residence requirements for animals before sending for slaughter (90 day residence in an EU approved part of the territory and 40 days on the last holding). A number of deficiencies which were identified, in particular related to the discrepancies between the registration of animals in the LITS compared with the actual animals present at livestock holdings, or those who died or were slaughtered as well as the absence of official controls on the registration of cattle and no supervisory controls on movements weaken the reliability of the system.

## 7 Closing Meeting

A closing meeting was held on 11 March 2013 with the CCA, the DVS. At this meeting the audit team presented the findings and preliminary conclusions of the audit and advised the CCA of the relevant time limits for production of the report and their response.

The representatives of the CCA acknowledged the findings and conclusions presented by the audit team.

## 8 RECOMMENDATIONS

An action plan, describing the action(s) taken or planned in response to the recommendations of this report and setting out a timetable to correct the deficiencies found, should be presented to the Commission within 25 working days of receipt of the report.

| N°. | Recommendation |
|---|---|
| 1. | To strengthen the official controls, in particular at feedlots and fenced farms ensuring that full traceability of all animals sent to, present at and sent from these holdings for slaughter is guaranteed in order to ensure that the conditions of points II.2.2 and II.2.3 of the export certificate "BOV" as laid down in Regulation (EU) No 206/2010 are met. |
| 2. | To further improve the official controls on animal identification and movement records so that data entered into the Livestock Identification and Traceability System is subject to verification as that data in the system is validated and thus able to support the attestations required by point II.2 of the export certificate "BOV" specified in Regulation (EC) No 206/2010. |
| 3. | To ensure that the guarantees for public health attestation set out in point II.1.6 (microbiological criteria for foodstuffs) of the model certificate "BOV" as laid down in Regulation (EU) No 206/2010 are met and adequate supervision takes place. |
| 4. | To implement fully controls on microbiological criteria, as laid down in Regulation (EC) No 2073/2005 and, to this end, to consider the provision of relevant and comprehensive training to officials. |
| 5. | To ensure that the guarantees for health attestation set out in point II.2.6 (contains boneless meat) of the model certificate "BOV" as laid down in Regulation (EU) No 206/2010 are met and adequate supervision takes place. |
| 6. | To further improve the procedures for issuing certificates and replacement certificates so that they meet the requirements laid down in Council Directive 96/93/EC, in particular Articles 3.1 and 5.1 thereof. |
| 7. | To ensure that records are kept on farms of treatments with veterinary medical products in order to provide guarantees at least equivalent to that required by Article 10 of Council Directive 96/23/EC. |

The competent authority's response to the recommendations can be found at:

http://ec.europa.eu/food/fvo/rep_details_en.cfm?rep_inspection_ref=2013-6866

## Annex 1 - Legal References

| Legal Reference | Official Journal | Title |
|---|---|---|
| Reg. 1760/2000 | OJ L 204, 11.8.2000, p. 1-10 | Regulation (EC) No 1760/2000 of the European Parliament and of the Council of 17 July 2000 establishing a system for the identification and registration of bovine animals and regarding the labelling of beef and beef products and repealing Council Regulation (EC) No 820/97 |
| Reg. 1825/2000 | OJ L 216, 26.8.2000, p. 8-12 | Commission Regulation (EC) No 1825/2000 of 25 August 2000 laying down detailed rules for the application of Regulation (EC) No 1760/2000 of the European Parliament and of the Council as regards the labelling of beef and beef products |
| Reg. 178/2002 | OJ L 31, 1.2.2002, p. 1-24 | Regulation (EC) No 178/2002 of the European Parliament and of the Council of 28 January 2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety |
| Reg. 852/2004 | OJ L 139, 30.4.2004, p. 1, Corrected and re-published in OJ L 226, 25.6.2004, p. 3 | Regulation (EC) No 852/2004 of the European Parliament and of the Council of 29 April 2004 on the hygiene of foodstuffs |
| Reg. 853/2004 | OJ L 139, 30.4.2004, p. 55, Corrected and re-published in OJ L 226, 25.6.2004, p. 22 | Regulation (EC) No 853/2004 of the European Parliament and of the Council of 29 April 2004 laying down specific hygiene rules for food of animal origin |
| Reg. 854/2004 | OJ L 139, 30.4.2004, p. 206, Corrected and re-published in OJ L 226, 25.6.2004, p. 83 | Regulation (EC) No 854/2004 of the European Parliament and of the Council of 29 April 2004 laying down specific rules for the organisation of official controls on products of animal origin intended for human consumption |
| Reg. 882/2004 | OJ L 165, 30.4.2004, p. 1, Corrected and re-published in OJ L 191, 28.5.2004, p. 1 | Regulation (EC) No 882/2004 of the European Parliament and of the Council of 29 April 2004 on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules |

| Legal Reference | Official Journal | Title |
|---|---|---|
| Reg. 2073/2005 | OJ L 338, 22.12.2005, p. 1-26 | Commission Regulation (EC) No 2073/2005 of 15 November 2005 on microbiological criteria for foodstuffs |
| Reg. 2074/2005 | OJ L 338, 22.12.2005, p. 27-59 | Commission Regulation (EC) No 2074/2005 of 5 December 2005 laying down implementing measures for certain products under Regulation (EC) No 853/2004 of the European Parliament and of the Council and for the organisation of official controls under Regulation (EC) No 854/2004 of the European Parliament and of the Council and Regulation (EC) No 882/2004 of the European Parliament and of the Council, derogating from Regulation (EC) No 852/2004 of the European Parliament and of the Council and amending Regulations (EC) No 853/2004 and (EC) No 854/2004 |
| Reg. 1099/2009 | OJ L 303, 18.11.2009, p. 1-30 | Council Regulation (EC) No 1099/2009 of 24 September 2009 on the protection of animals at the time of killing |
| Reg. 1162/2009 | OJ L 314, 1.12.2009, p. 10–12 | Commission Regulation (EC) No 1162/2009 of 30 November 2009 laying down transitional measures for the implementation of Regulations (EC) No 853/2004, (EC) No 854/2004 and (EC) No 882/2004 of the European Parliament and of the Council |
| Reg. 206/2010 | OJ L 73, 20.3.2010, p. 1–121 | Commission Regulation (EU) No 206/2010 of 12 March 2010 laying down lists of third countries, territories or parts thereof authorised for the introduction into the European Union of certain animals and fresh meat and the veterinary certification requirements |
| Dir. 96/22/EC | OJ L 125, 23.5.1996, p. 3-9 | Council Directive 96/22/EC of 29 April 1996 concerning the prohibition on the use in stockfarming of certain substances having a hormonal or thyrostatic action and of ß-agonists, and repealing Directives 81/602/EEC, 88/146/EEC and 88/299/EEC |

| Legal Reference | Official Journal | Title |
|---|---|---|
| Dir. 96/23/EC | OJ L 125, 23.5.1996, p. 10-32 | Council Directive 96/23/EC of 29 April 1996 on measures to monitor certain substances and residues thereof in live animals and animal products and repealing Directives 85/358/EEC and 86/469/EEC and Decisions 89/187/EEC and 91/664/EEC |
| Dir. 96/93/EC | OJ L 13, 16.1.1997, p. 28-30 | Council Directive 96/93/EC of 17 December 1996 on the certification of animals and animal products |
| Dir. 97/78/EC | OJ L 24, 30.1.1998, p. 9-30 | Council Directive 97/78/EC of 18 December 1997 laying down the principles governing the organisation of veterinary checks on products entering the Community from third countries |
| Dir. 98/83/EC | OJ L 330, 5.12.1998, p. 32-54 | Council Directive 98/83/EC of 3 November 1998 on the quality of water intended for human consumption |
| Dir. 2002/99/EC | OJ L 18, 23.1.2003, p. 11-20 | Council Directive 2002/99/EC of 16 December 2002 laying down the animal health rules governing the production, processing, distribution and introduction of products of animal origin for human consumption |
| Dec. 2000/572/EC | OJ L 240, 23.9.2000, p. 19-24 | 2000/572/EC: Commission Decision of 8 September 2000 laying down animal and public health conditions and veterinary certification for imports of minced meat and meat preparations from third countries and repealing Decision 97/29/EC |
| Dec. 2007/777/EC | OJ L 312, 30.11.2007, p. 49-67 | 2007/777/EC: Commission Decision of 29 November 2007 laying down the animal and public health conditions and model certificates for imports of certain meat products and treated stomachs, bladders and intestines for human consumption from third countries and repealing Decision 2005/432/EC |