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FINAL REPORT OF AN AUDIT

CARRIED OUT IN

SWAZILAND

FROM 28 JANUARY TO 04 FEBRUARY 2014

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 Swaziland from 28 January to 4 February 2014. The objectives of the audit were to evaluate the operation of controls over the production of fresh bovine meat for human consumption destined for export to the European Union (EU), as well as certification procedures. The audit was a combined audit with the audit DG(SANCO)/2014-7089 (Evaluation of the animal health control system in place, in particular in relation to controls on foot and mouth disease (FMD)).

The enactment of legislation related to animal identification, movement controls and public health has progressed since the previous audit DG(SANCO)/2011-6122.

The budget of the National Veterinary Service (NVS) has been reduced. The staff available have not managed to carry out all the planned control tasks in relation to animal identification, movement controls and public health.

Significant improvements have been achieved in relation to animal identification, holding registration and movement control. However, further work is required. The electronic database SLITS is not yet utilised to its full potential and the system lacks an element to ensure the three month residency in the territory. The current use of a cattle holding as a collection centre for cattle destined to be slaughtered in the EU export approved slaughterhouse is not in line with Commission Regulation (EU) No 206/2010.

There is one EU export approved slaughterhouse in Swaziland. Procedures were in place to verify the establishment's compliance with relevant EU legislation. Hygiene and maintenance were in general satisfactory and the majority of the deficiencies noted (mostly minor or easily rectified) had been identified by the CA. The official controls carried out at the establishment visited were in general satisfactory and well documented. However, the controls on FMD and maturation had some shortcomings.

The audit team noted some shortcomings in relation to the certification. The certifying officers were certifying for compliance with EU legislation although they did not have all the relevant information available in relation to the animal health requirements given in the model certificate.

Overall the report concludes that: The control system in Swaziland has the necessary elements to provide satisfactory assurances regarding compliance with, or equivalence to, EU requirements as required by Article 46.1(h) of Regulation (EC) No 882/2004. However, the weaknesses noted in relation to animal health controls at slaughter require immediate remedial action.

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
AHI	Animal Health Inspector
CA(s)	Competent Authority(ies)
CCA(s)	Central Competent Authority(ies)
CCP(s)	Critical Control Point(s)
DG(SANCO)	Health & Consumers Directorate General
DVLS	Department of Livestock and Veterinary Services
EC	European Community(ies)
EU	European Union
FBO(s)	Food Business Operator(s)
FVO	Food and Veterinary Office
FMD	Foot and Mouth Disease
HACCP	Hazard Analysis of Critical Control Points
Hygiene Package	Regulations (EC) No 852/2004, No 853/2004 and No 854/2004
NVS	National Veterinary Service
OIE	World Organisation for Animal Health
OV	Official Veterinarian
SLITS	Swaziland Livestock Information and Traceability System
SRP	Stock removal Permit
VA	Veterinary Assistant
VFS	Veterinary Field Service
VPHU	Veterinary Public Health Unit

1 Introduction

The audit took place in Swaziland from 28 January to 4 February 2014 as part of the planned audit programme of the Food and Veterinary Office (FVO). The audit team comprised 2 auditors from the FVO. The audit was combined with the audit DG(SANCO)/2014-7089 which reviewed the animal health control system in place, in particular in relation to controls of foot and mouth disease (FMD).

The audit team was accompanied by representatives from the Central Competent Authority (CCA), the Department of Livestock and Veterinary Services (DLVS).

The opening meeting was held on 28 January 2014 with the CCA in Mbabane. At this meeting the audit team confirmed the objectives of, and itinerary of the audit, and additional information required for the satisfactory completion of the audit was requested.

2 Objectives

The objective of the audit was to evaluate the official controls related to export of fresh bovine meat to the European Union (EU) as well as the actions taken by the competent authorities (CAs) of Swaziland to address the seven recommendations of the previous FVO audit report DG(SANCO)/2011-6122 (hereafter referred to as report 2011-6122).

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

The audit team in particular:

- reviewed the CA organisation and operation;
- 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 official controls in place over the production of fresh bovine meat, including those controls necessary for certification in accordance with the requirements of Commission Regulation (EU) 206/2010;
- reviewed the system for certification of animals and meat in relation to the requirements of Council Directive 96/93/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, and in conjunction with audit DG(SANCO/2014-7089 on animal health, the audit itinerary included the following:

COMPETENT AUTHORITIES			Comments
Competent Authorities	Central	2	Opening and Closing meeting with DLVS, meeting with the National Trust Commission
	Regional	4	
	Local (Subregional)	2	
FOOD PRODUCTION / PROCESSING / DISTRIBUTION – ACTIVITIES			
Slaughterhouses		1	One EU-approved slaughterhouse with integrated cutting plant
Cutting premises		1	
Laboratories		1	Central Veterinary Laboratory
Communal holdings		1	The dip tank place was visited
Private holdings/Collection centres		1	1 private holding with 3 different activities was visited (breeding cattle herd, feedlot, and providing premises functioning as a collection centre for the slaughterhouse exporting bovine meat to the EU)
Feedlots		1	
Quarantine stations		4	2 governmental and 1 private quarantine stations
Border control points		3	1 along the border with Mozambique, 2 along the border with South Africa
Veterinary pharmacy		1	

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.

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

4 Background

Swaziland has been recognised by the World Organisation for Animal Health (OIE) as a country free of FMD without vaccination since May 2010 (the last outbreak of FMD was in 2001). However, a number of outbreaks occurred in 2011 in South Africa in the vicinity of the border with Swaziland (see report 2014-7089 for details).

Swaziland has been regionalised for export of de-boned and maturated meat from bovine and wild ruminants origin, but the country exports only bovine meat to the EU. The regionalisation excludes the eastern region close to Mozambique. Exports of bovine meat are allowed if the meat originates from animals sourced from the regions SZ1 and SZ2 (see report DG(SANCO)/2014-7089 for details). Swaziland has one integrated slaughterhouse/cutting plant from which the Member States are permitted to import fresh de-boned bovine meat after maturation.

The previous audit concerning the safety of food of animal origin in Swaziland was carried out from 1 to 4 February 2011, the results of which are described in report 2011-6122. This report is accessible at:

http://ec.europa.eu/food/fvo/ir_search_en.cfm

The action plan received from the Swaziland authorities provided satisfactory guarantees in response to all of the report's recommendations at desk analysis. The recommendations of the previous audit were followed up during this audit.

Swaziland's residue monitoring for bovine meat has been approved according to Commission Decision 2004/432/EC.

The number of livestock in 2013 comprised 651 314 cattle, 475 773 goats, 17 897 sheep, 85 buffaloes and 41 010 pigs.

The volumes (expressed in tonnes) of fresh bovine meat exported to the EU and Norway in 2012 and 2013 as provided by the DLVS is given in the table below.

	EU (Reunion and Mayotte)		**Norway**		**In total**
Year	**Volume (tonnes)**	**Number of consignments**	**Volume (tonnes)**	**Number of consignments**	**Volume (tonnes)**
2012	85	10	619	67	704
2013	120	13	532	60	652

5 Findings And Conclusions

5.1 Legislation and Competent Authorities

5.1.1 Legal basis

Article 46.1 of Regulation (EC) No 882/2004 stipulates that official controls by Commission experts in third countries shall verify compliance or equivalence of third country legislation and systems with EU feed and food law, and EU animal health legislation. These controls shall have particular regard to points (a) to (e) and (g) of the aforementioned Article.

5.1.2 Findings

5.1.2.1 Legislation

In relation to recommendation 1 of the report 2011-6122 (to continue updating and enacting all the legislation and administrative procedures required for the effective implementation of the export requirements for bovine meat), the audit team noted that:

- the Livestock Identification Act 13/2001 entered into force in January 2014;
- the Veterinary Public Health Act 17/2013 entered into force in January 2014;

- the Great Stock Brand Act was repealed in 2013; and
- the Guidelines of the National Veterinary Services (NVS) have been updated. The Chapter on importation of cattle for feedlot purposes (from South Africa) and subsequent slaughter for the EU was cancelled in March 2011 in the Guidelines of the NVS.

Observations:

- The Animal Identification and Traceability Regulations 2012 is still at draft stage. The draft comprises rules on holding and kraal registration, animal identification and movement controls. The draft has been submitted to the Attorney General before presenting it to the Parliament.
- The national legislation does not have clear rules about ear tagging of illegally imported cattle and no procedure had been established to ensure that such animals are excluded as a source of meat for EU export. Theoretically it is possible that such animals could go for slaughter to the EU-approved slaughterhouse.
- The guidelines of the NVS lack a chapter dealing with animals that may have been smuggled from the neighbouring countries.
- The CAs at the export slaughterhouse visited had the relevant EU legislation available but it had not been updated.

5.1.2.2 Competent Authorities

5.1.2.2.1 Organisation of Competent Authorities

The organisation of the CAs has remained largely as described in the report 2011-6122, except for establishing the new Veterinary Public Health Unit (VPHU). The NVS is a part of the DLVS of the Ministry of Agriculture. The headquarters of the NVS is divided into three main sections, namely the Veterinary Field Services (VFS), the Veterinary Epidemiology Unit and the VPHU. The VFS has under its umbrella the Central Veterinary Laboratory, the Veterinary and Livestock Training Centre and the Regional CA (RCA), the regional field services.

The VFS has 4 regional offices which supervise 28 local (sub-regional) offices. At the local, primary care level at the dip tanks, the veterinary assistants (VAs) are responsible for the controls, aided by the dip tank assistants and the dip tank committee.

The Veterinary Public Health Act 17/2013 establishes the VPHU and its functions. Its task is to provide for official control of slaughterhouses and establishments. With the new Act approvals of slaughterhouses (currently under the Ministry of Health/municipalities) will become the responsibility of the DLVS. However, there is a three year transitional period until 2016 for the approvals. The VPHU is responsible for meat hygiene at the export slaughterhouses (one red meat and one poultry slaughterhouse) and, in addition, for the food safety of imports of food of animal origin. Their Meat Hygiene Section is responsible for controls of meat produced for the domestic and export market. The staff of the Meat Hygiene Section comprises, in addition to the veterinary officers, meat inspectors.

The VFS co-operates also with the police that has a special Stock Theft Unit dealing with stolen livestock.

Observations:

- There was a clear line of command and regular reporting between the different CA levels, starting from the VAs at dip tank level reporting to the sub-regional offices. The sub-

regional CAs report to the RVS and they report to the VFS (e.g. monthly reports were available).

- Evidence of regular meetings between the different CA levels was available.
- The CAs in the offices visited were well motivated and competent.
- The VPHU was only starting its activities.

5.1.2.2.2 Competent Authorities powers, independence and authority for enforcement

The NVS has the necessary powers, independence and authority for enforcement under the applicable legislation for animal health, animal identification, holding registration and movement controls. Evidence was available at the RCA offices visited that action and enforcement had been taken in relation to serious non-compliances, resulting in imposing fines and involvement of the police (for example, fines had been given as a result of repeated failure to bring animals for dipping).

Observations:

- There is a big difference between the upper limits of fines possible under the Stock Diseases Regulations (1933) (20 Euros (300 Emalangeni) or 34 Euros (500 Emalangeni for repeated offences)), and the upper limit of fines possible under the Animal Identification Act is (up to 10 000 Emalangeni).

- The evidence of fines given, as seen in the CA offices visited, was in most cases seen in the lower scale of the range possible (for example, 4 Euros (60 Swazi Emalangeni) for illegal movement of cattle, 20 Euros for the illegal import of 10 goats from South Africa).

5.1.2.2.3 Supervision and documented control procedures

In relation to recommendation 2 (to improve supervision of official controls and to improve documentation of controls in line with Article 12(2) of Regulation (EC) No 854/2004), the audit team verified that action has been taken. The CCA audit plans comprise annual audits of all four regional offices and an annual audit of the EU-approved bovine slaughterhouse. The RCAs carry out annual audits of the sub-regional offices. The officers from other sub-regions can be part of such an audit team.

Evidence of supervisory controls were available at the premises visited (e.g. border inspection posts, dip tanks, sub-regional offices). The regional and sub-regional offices visited had logbooks available for the documentation of various types of controls (e.g. monthly controls carried out at dip tanks, controls carried out at border inspection points). Reports of audits carried out by the CCA on the RCAs were available.

The audit questionnaire on the VFS service had been updated and included a section on veterinary medicines/withdrawal period and on 40-day residency on the last holding.

Observations:

- Not all audits planned by the CCA and RCA have been carried out with the planned frequency. For example, in one region visited the RCA had not carried out any audits in the sub-regions in 2012 as they had prioritised the ear tagging project of cattle instead.
- The CA staff at the slaughterhouse and the controls carried out by them have not yet been

audited by the CCA although this should be done annually.

- The CA does not have any documented procedures in relation to controls of the specific EU requirements as given in the EU legislation and the model health certificate "BOV".
- Evidence was available that the animal health inspectors (AHIs) of the sub-regional offices carry out monthly inspections of dip tanks. However, the reports seen do not include a section about monitoring the performance of the VAs.
- Evidence was available at the border control points visited that the AHIs of the sub-regional offices carried out monthly visits to the border control points and checked the control logbooks. However, they did not monitor the performance of the CAs of the border control points.
- Not all of the audit reports seen contained a request for an action plan or deadlines for actions to be taken.

5.1.2.2.4 Training of staff in performance of official controls

Annual training programmes are organised both at the CCA and regional level for the staff. Since the 2011 FVO audit, training had been organised for example, on EU requirements, certification, the Swaziland Livestock Identification and Traceability System (SLITS), animal health refresher training, and management of dip tanks. The audit team verified on-the spot that training courses had been organised as planned.

5.1.2.2.5 Resources

The audit team received the summary figures for the budgets 2011/2012, 2012/2013, 2013/2014 and 2014/2015.

Observations:

- The total budget has dropped 3% for 2012/2013, 9% for 2013/2014 and 2% for 2014/2015 when compared with the 2011/2012 level. The areas mostly affected by the cuts were the vehicle charges (budget reduced by 30 % and capital projects (no provisions for 2012-2015). Some of the sub-regional offices lacked hardware for running the electronic database.
- The audit team noted in the regions visited that the work programme had not been carried out as planned or had been carried out with significant delays (for example, in relation to animal identification, entering data into the SLITS). All the posts for AHIs given in the organigramme were not all filled. The lack of vehicles had forced staff to use public transport which was not always available or go to dip tanks by foot. The CA met stated that this was caused by a lack of resources.

5.1.2.2.6 Organisation of control systems

The Guidelines of the NVS comprise detailed instructions for carrying out official controls related to different areas (e.g. controls carried out at dip tanks, border inspection points, cordon fences, dairy holdings, export-approved slaughterhouses). The EU-export approved slaughterhouse was inspected at least once a year by the CCA. The reports seen included shortcomings and requests for action to rectify them.

Observation:

- The annual targets for the official controls in the sub-region were not all reached. The CA stated that this was because of a lack of resources (lack of finances, shortage of staff and transport means).

5.1.3 Conclusions

The enactment of legislation related to animal identification, movement controls and public health has progressed since the previous audit 2011-6122. The Swaziland authorities have put in a big effort to implement and document the official controls.

The budget of the NVS had been reduced. The staff available have not managed to carry out all the planned control tasks in relation to animal identification, movement controls and public health.

Despite these weaknesses, the control system in Swaziland has the potential to provide satisfactory assurances regarding compliance with, or equivalence to, EU requirements as required by Article 46.1(h) of Regulation (EC) No 882/2004.

5.2 HOLDING REGISTRATION, ANIMAL IDENTIFICATION AND MOVEMENT CONTROLS

5.2.1 Legal Requirements

The veterinary certification requirements for the introduction into the EU of fresh meat are laid down in Commission Regulation (EU) No 206/2010 (see report 2014-7089 for details). Part I of the Annex to Commission Regulation (EU) No 206/2010 establishes regionalisation of Swaziland for export of fresh meat from domestic cattle, which must come from the SZ1 or SZ2 regions. Point II.2 of the model certificates, in Part 2 of Annex II to the Regulation, sets out the animal health requirements to be met, including for bovine animals the requirement for the CA to have system(s) in place for holding registration and animal identification.

For bovine animals the animal health requirements include that the meat has been obtained from animals that have remained in the same territory since birth or for at least three months before slaughter (unless introduced from another territory approved by the EU). In addition, the animals must have remained for at least 40 days in the holdings before dispatch. The dispatch to the slaughterhouse must be direct, without contact with animals of a different health status.

5.2.2 Findings

Holding registration

The system of holding registration has been described in the report 2011-6122. All livestock and their owners have to be registered with a dip tank that is either public or private. The dip tanks form the epidemiological units. The individual herds with their number of animals are registered in a dip tank register book.

All cattle, sheep and goats must be dipped at regular intervals against ticks. The frequency of dipping intervals varies between summer and winter and between different regions, resulting in intervals between once weekly up to once monthly for cattle. The small ruminants have to be dipped once a month. The dipping is carried out under the supervision of VAs (specially trained animal health technicians). At the dipping event, the VA updates the dip tank register and notes the

number of animals brought for dipping/missing. The VA is responsible for keeping the dip tank register updated. The AHI of the sub-regional office supervises the VAs and is required to visit the dip tanks once a month. The AHI keeps his own register of the dipping event. An annual census of animals belonging to the holders (and to the dip tanks) is recorded.

Small-scale fattening units (253 registered, 39 active) and small-scale dairy farmers (404 registered) are exempt from taking cattle to the public dip tanks. These holdings have either their own dip tanks or spray the cattle. The VAs are required to visit these holdings on a regular basis.

The dip tank registers were available at the dip tanks visited and were kept up to date. Holding registers were available on the holding visited for different types of cattle kept (registers for feed lot, breeding cattle and slaughter cattle destined for the EU-export slaughterhouse). Registers of veterinary treatment were available, including the withdrawal period (except of one holding: missing for anti-parasitic treatments). The premises visited were all correctly registered in SLITS. Evidence was available in the sub-regional offices visited that fines had been issued to animal keepers failing to bring their animals for dipping.

Observations:

- Some recently established dip tanks had not yet been entered into SLITS.
- The dip tank registers were available at the dip tanks visited and had been kept up to date by the VAs. However, it was noted that some owners did not bring all animals to dipping as required.
- Auctions and sales yards are not registered as holdings and are therefore not included in SLITS.
- The fines given to the farmers failing to bring animals for dipping were in general low (on average, 4 Euro (60 Emalangeni).
- The VAs did not register the ear tag numbers of the missing animals into the register, only the crude identification details (sex, colour, breed).

Animal identification

The Livestock Identification Act requires all cattle to be hot iron branded with a country mark and a dip tank of origin number at the latest by the age of six months. In addition the animals have to be ear tagged with yellow ear tags (double ear tags) at the latest by one month old. All imported animals have to be branded with the import mark "CI" and have to be ear tagged with blue import ear tags. According to the CCA, 506 of the 565 public active dip tanks have tagged cattle and 134 out of 246 of the private dip tanks have tagged cattle. At the public dip tanks 85% of cattle are ear tagged and for private dip tanks it is 54%. The target is to have all cattle ear tagged by the end of June 2014. The ear tagging is not carried out in the months with a lot of rain. The first round of ear tagging carried out at the dip tanks was paid for by the government; the second round should be paid by the owners. The regional offices visited had ear tags allocated to the dip tanks available. The blue import ear tags have to be ordered from the CCA and are paid for by the owner of the animals. The blue ear tags should be put on the imported animals within 48 hours of arrival at the quarantine. The staff at the regional office visited had the branding tool available for the CI brand. Most of the cattle seen on the premises visited were correctly identified (double ear tags and branded).

Observations:

- The audit team noted in the summary reports seen from some sub-regions, that not all cattle had been branded and ear tagged although programmed. For example, in one sub-region no

branding had been carried out in 2012.

- Some animals were seen without brands, and also some animals (especially younger animals that were over one month old) were seen without ear tags).
- The audit team noted that in the sub-regional offices visited there was a back log in relation to the ear tagging. Although the procurement rules require animal keepers to order the ear tags for the second round in advance and bring the tags to the dip tank for tagging, in one sub regional office visited boxes with ear tags for 28 animal keepers were stored.
- The animals in one private quarantine visited had been ear tagged and branded at the end of the 30 day quarantine period, not within 48 hours of arrival, as required.
- Smuggling of livestock/illegal imports between Swaziland and South Africa and Swaziland and Mozambique is not uncommon. In 2013, approximately 80 animals were reported as either smuggled or illegally imported from South Africa or Mozambique. Upon detection, the animals were placed in quarantine for 21 days and checked for clinical signs of FMD. The animals were not identified as imports and evidence was available that in some cases the cattle had been released from the quarantine without any identification, leading to loss of traceability.

Movement controls

In relation to recommendation 3 of the report 2011-6122 (to put in place documented procedures to guarantee that only EU eligible animals are slaughtered for export to the EU and in particular that the conditions of points II.2.2. and II.2.3 of the export certificate BOV are met) the audit team noted that the 40-day declaration by the farmer, countersigned by the AHI) were available for the cattle that had been entering or leaving the holdings visited, for cattle entering the EU-export slaughterhouse and also for the animals destined for EU slaughter going via a designated farm functioning as a collection centre.

For live cattle imports, the FBOs need to apply for an import permit from the Director of the DLVS. Imports from Mozambique are not allowed, but livestock can be imported from South Africa. The FBO operating the EU export slaughterhouse has agreed with the CAs not to slaughter any imported cattle in the slaughterhouse.

The movement of livestock (cattle, sheep and goats, pigs and horses) into and out of a dip tank area requires a Stock Removal Permit (SRP) obtained from the area or sub-regional VS office responsible for the dip tank of origin. The SRP can be issued either electronically or manually. The VA at the dip tank area inspects the animals to be moved and endorses the details of the animals such as numbers of animals, colour, sex, age group and official identification marks. The SRP is issued in double. The copy stays at the dip tank of origin and the original moves with the animal to the dip tank of destination.

The VAs are required to enter the data from the movement permits into the electronic database SLITS. Currently 15 sub-regional offices of the 28 are connected to SLITS and can enter data. The CA were in the process of obtaining computers and connecting the remaining unconnected offices to SLITS.

The SLITS has 3 parts, Part I comprises the dip tank areas, kraals and owners, animal movement, the second part the animal health information and the third part the registers of brands. Information available in the data bank comprised events such as dipping dates, quarantine status of the dip tank, imports, births, deaths and slaughter, distribution of tags and registers of brands.

The SRPs were available for the cattle that had been moved in the sub-regions visited. When the audit team cross-checked the data available on the SRPs and the dip tank registers, most data

matched with the data in SLITS.

Observations:

- No measures are in place to verify that the animals coming from the dip tanks in the authorised region to the EU export slaughterhouse have been in this area since birth or in the last three months.
- Some of the stock removal permits were incompletely filled in (e.g. number of the removal permit was missing and the identification details of the animals were only filled in at arrival at the slaughterhouse).
- The slaughterhouse approved for EU export used a private holding as a collection centre for slaughter cattle. Evidence was available that the FBO had proposed the system in writing to the CCA who had accepted it in June 2011. The use of the collection centre allowed the FBO to gather enough cattle for a slaughter lot. It also allowed him to treat the animals if necessary (for example, against ticks) and keep them until the withdrawal period had elapsed. The animals were considered as keeping their 40-day residence status of the holding they came from if the stay was up to 14 days. If that was exceeded they had to stay 40 days in the collection centre. The cattle collected for slaughter were kept in designated enclosures (two for slaughter animals going to the slaughterhouse either the next day or if being dipped, once the 7 days withdrawal period had elapsed, 1 for 40 day residence (injured or sick animals). According to the FBO the next week a different pen would be used for the slaughter animals to prevent mixing of the slaughter stock with the animals from the previous week waiting for the withdrawal period to end. On the same holding the owner of the holding had a cattle feed lot (located some 800 meters away) and breeding cattle (kept grazing on pastures further away). Commission Regulation (EU) No 206/2010 gives the possibility to allow the movement of slaughter cattle, sheep or goats from the holding to the slaughterhouse via an assembly centre, but this has to be approved by the Commission Services (listed as a supplementary guarantee J in the Annex II, parts 1 and 2, of Commission Regulation (EU) No 206/2010).
- Animals reported stolen and returned to Swaziland are not recorded as imported in SLITS and thus their traceability is lost.
- The SLITS database does not allow the recording of the arrival of the animals at the destination.
- Some parts of SLITS are not yet operational (e.g. data on animal health, geographical co-ordinates are not yet filled in).
- SRPs were not issued for animals moved from the border inspection points to the quarantine station.

5.2.3 Conclusions

Significant improvements have been achieved in relation to animal identification, holding registration and movement control. However, further work is required. The electronic database SLITS is not yet utilised to its full potential and the system lacks an element to ensure the three month residency in the territory. The current use of a cattle holding as a collection centre to cattle destined to be slaughtered in the EU export approved slaughterhouse is not in line with Commission Regulation (EU) 206/2010.

5.3 Laboratory services

5.3.1 Legal Requirements

The veterinary certification requirements for the introduction into the EU of fresh meat are laid down in Commission Regulation (EU) No 206/2010. Point II.1 of the model certificates, in Part 2 of Annex II to the Regulation, sets out the public health requirements to be met. These include the requirement to satisfy the relevant microbiological criteria set out in Commission Regulation (EC) No 2073/2005, and the special guarantees concerning *Salmonella* for consignments to Finland and Sweden.

5.3.2 Findings

5.3.2.1 Laboratories testing microbiological criteria for foodstuffs

The FBO visited was using an ISO 17025-accredited laboratory in South Africa for testing of carcases for microbiological criteria. The methods used were accredited. The results were received without any undue delay. The microbiological analyses of the in-house laboratory were restricted to water testing and testing of cleanliness (surface samples).

5.3.3 Conclusion

The audit team did not note any shortcomings in relation to the use of the external ISO-accredited laboratory for analysis of carcass samples for microbiology.

5.4 Listing of establishments

5.4.1 Legal requirements

Article 12 of Regulation (EC) No 854/2004 requires that products of animal origin may be imported into the EU only if they have been dispatched from, and obtained or prepared in, establishments that appear on lists drawn up, kept up-to-date and communicated to the Commission.

5.4.2 Findings

One establishment is listed for export of bovine meat to the EU. This establishment is inspected annually by the CCA to verify its compliance with the relevant EU legislation. The check-list used includes relevant points such as documentation accompanying the arriving animals (40-day residence declaration, separation of EU eligible and non-eligible carcasses, controls on maturation. Reports of the annual inspections were available.

Observations:

- Although the location within the slaughter hall chosen for carrying out controls of the mouth, tongue and feet for FMD lesions is not suitable for such controls, the CCA have not highlighted this as a deficiency in their report.
- Furthermore, the CCA have not remarked in their annual control reports that the documentation of the maturation controls should be more complete to allow easy verification of maturation for all carcasses included in an EU export lot.

5.4.3 Conclusions

Swaziland has one establishment approved for export of bovine meat to the EU. Procedures were in place to verify the establishment's compliance with relevant EU legislation. The procedures in place in relation to the FMD controls at the slaughterhouse were not thorough enough and the documentation was not sufficiently detailed.

5.5 Official controls at establishment level

5.5.1 Legal requirements

Article 12 of Regulation (EC) No 854/2004 lays down that the CA of a third country of origin has to guarantee that establishments placed on the list of establishments from which imports of specified products of animal origin to the EU are permitted, together with any establishments handling raw material of animal origin used in the manufacture of the products of animal origin concerned, complies with relevant EU requirements, in particular those of Regulation (EC) No 853/2004, or with requirements that were determined to be equivalent. It also lays down that an official inspection service supervises the establishments and has real powers to stop the establishments from exporting to the EU in the event that the establishments fail to meet the relevant requirements.

The animal and public health and veterinary certification requirements for the introduction into the EU of products of animal origin intended for human consumption are laid down in the model certificate "BOV" in part 2 of Annex II to Regulation (EU) No 206/2010.

5.5.2 Findings

5.5.2.1 Ante-mortem inspection

Ante-mortem controls were carried out in line with the requirements of Chapter II B, of Annex I to Regulation (EC) No 854/2004 and comprehensive registers for *ante-mortem* controls were in place. According to the system applied, the cattle arrive on the previous day and are checked by the auxiliaries or the OV at unloading. The animals are rested overnight and are checked by the OV before the slaughter. The *ante-mortem* checks comprised checking of the documentation (stock removal permits and the 40-day residence declaration), animal identification and numbers delivered and the visual examination of the animals. The arrival time was noted on the pen cards, as well as the *ante mortem* findings and the time of the *ante-mortem*. The ear tags were removed after stunning and the numbers were entered into the electronic database linking the specific animal with the carcass slaughter number.

5.5.2.2 Post-mortem inspection

The *post-mortem* controls on carcasses and red and green offal were carried out in line with the requirements of Section IV of Annex I to Regulation (EC) No 854/2004. The *post-mortem* controls were routinely carried out by auxiliaries (meat inspectors). The meat inspectors also declared meat unfit for human consumption. In case the meat inspectors were unsure about the decision, the OV was called up to check the carcass and make the final decision on whether the carcass or parts of it should be condemned.

The number of cattle slaughtered by the export abattoir in 2012 was 7 696. Of these, approximately 95 % were EU-eligible. Most whole carcass condemnations were for tuberculosis (40), whereas the reasons for the most common organ condemnations were emphysema of the lungs, *Cysticercus*

bovis, abscesses and peritonitis.

Observations:

- The OVs did not inspect all meat that had been put aside by the auxiliaries and all other meat from the same animals, although Chapter II points b i and ii of Section III to Annex I to Regulation (EC) 854/2004 requires this.

5.5.2.3 Controls on FMD

After the stunning, the animals' mouths, tongues and feet were checked for FMD.

Observation:

- The short time available before stunning and bleeding did not allow for washing of dirty feed or for a thorough inspection. In addition, the lighting at that spot was not sufficient for the task.

5.5.2.4 Maturation of meat

Check-lists were used to document the maturation of meat in designated export chillers. The CAs checked the temperature of three carcasses at the start and end of the maturation. The chiller was sealed for maturation. The temperature results seen were satisfactory. Evidence was available of regular calibration of thermometers used.

Observations:

- No documented procedure had been developed for the maturation. The documentation of the maturation lots lacked details such as individual carcass numbers in the lot, exact times when the maturation started and ended.

5.5.2.5 General and specific hygiene

In response to recommendation 4 of the report 2011-6122 (to ensure that deficiencies observed in the establishment visited are rectified and that guarantees required by Article 12(2) of Regulation (EC) No 854/2004 are met) the audit team noted that actions had been taken but some shortcomings still remain (freezers still in poor condition).

The slaughterhouse and cutting plant visited had in general adequate facilities and equipment. The cutting plant was also cutting meat imported from South Africa for the national market, with a separation in time in relation to meat cut for the EU (cutting for EU was either on different days or if on the same day, the meat destined for EU was cut first). The audit team noted some maintenance problems, most of them had been identified in a recent CCA audit report.

Observations:

The audit team noted some deficiencies in relation to general and specific hygiene, most of which had been identified in the CCA inspection reports. For example,

- The freezers were in poor condition, with ice formation and some of the doors' defrosting devices broken. However, work was in progress to replace the old freezers with a new freezing unit.

- The men's' changing room was messy, with no clear separation for street clothes and clean working clothes, and the ladies' toilet lacked tiles on the wall.
- The store for wrapping and packing material was dusty, with pooling of water on the floor and a broken unused wooden door inside.

5.5.2.6 Hazard Analysis Critical Control Points(HACCP)-based systems:

The own controls were carried out as planned with good documentation and results. The slaughterhouse HACCP had two critical control points (CCPs), namely the metal detection and carcass inspection for faecal contaminations.

In response to recommendation 5 of the report 2011-6122 (to ensure that water testing includes all the parameters required in Council Directive 98/83/EC), the audit team noted that the samples are taken daily (for temperature, chlorine and turbidity), and weekly for microbiology. The chlorine in the water samples was inactivated and the samples are analysed for total bacterial count, *enterobacteria* and *Escherichia coli*. The samples were analysed in the own (non-accredited) laboratory and in an ISO 17025 accredited laboratory. The water was analysed once annually for chemical parameters. The water results seen were satisfactory.

Observations:

- The CCP carcass inspection was carried out by the meat inspectors, not the FBO staff.
- The FBO did not have a declaration of compliance for the food contact materials used, as required by Article 16 of the Regulation (EC) No 1935/2004.

5.5.2.7 Microbiological testing

In response to recommendation 6 of the report 2011-6122 (To ensure that microbiological carcass testing is done in line with Commission Regulation (EC) No 2073/2005), the audit team noted that adequate action had been taken. The carcasses were sampled weekly in line with the requirements of Commission Regulation (EC) No 2073/2005. The samples were sent to an ISO 17025-accredited laboratory to South Africa. The methods used were accredited. Trend analyses were available.

The FBO has a weekly sampling programme to monitor the effectiveness of the cleaning programme (sampling of surfaces, equipment and staff hands). Evidence was seen of action taken in case the limits were exceeded (training of staff, additional cleaning).

Observation:

The test method used for *Salmonella* was accredited for surfaces but not for meat.

5.5.2.8 Traceability and identification marking

The FBO had established a system of traceability that allowed to trace, both forwards and backwards, to the slaughter day and the dip tank of origin. The audit team carried out traceability exercises both forwards and backwards and the system was functioning well. The FBO had in general very good traceability records.

The EU eligible carcasses were all stamped with the oval health mark, whereas the carcasses for the national market had a round stamp. Two health marks with seal numbers were placed on the meat packages and the OV kept track of the health marks used (a separate logbook was available).

Observations:

- As the carcasses were hosed with water after the application of the health mark, it became smudged and difficult to read.
- The meat packages were correctly labelled except for one package seen, where the use by date was erroneously the same as the packaging date.

5.5.2.9 Animal welfare at the time of slaughter or killing

The stunning was carried out effectively using a captive bolt and the FBO stated that reserve stunning equipment was available.

Observations:

- An electric prod was used to move the animals forward into the stunner and no alternative means was available.
- The slaughterhouse staff were cutting the part of the ear with the ear tag immediately after the stunning and before bleeding, before the animal was dead. This is contrary to point 3.2 of Annex III to Council Regulation (EC) No 1099/2009.

5.5.2.10 Documentation of official controls

The central control authorities carried out annual audits on the FBOs' compliance with the requirements of Regulations (EC) No 852/2004 and No 853/2004. The annual audit reports were available. The audit report comprised findings, level of impact assessment and urgency of attention and recommendations. However, no deadlines were recorded. The last annual audit had been carried out in January 2014 and the FBO had already rectified some of the shortcomings noted in the report at the time of the FVO visit.

Observations:

- The points of the audit report comprised mostly findings related to the structures and equipment whereas very little details were available in relation to checking of the own controls. For example, the report did not mention whether the compliance with Regulation (EC) No 2073/2005 was checked.
- The reports seen did not mention whether the audit included checking of the EU-eligibility of the cattle, control of FMD, traceability and certification.

5.5.3 Conclusions

The official controls carried out at the establishment visited were in general satisfactory and well documented. However, the controls on FMD and maturation had some shortcomings.

5.6 Official certification

5.6.1 Legal requirements

Council Directive 96/93/EC lays down the general rules to be observed by third countries in issuing certificates required for exports to the EU, according to the specific EU veterinary legislation.

The specific animal health, public health and veterinary certification requirements for the introduction into the EU of fresh bovine meat intended for human consumption, are laid down in

Commission Regulation (EU) No 206/2010.

5.6.2 Findings

The findings in relation to recommendation 3 of the report 2011-6122 are given in chapter 5.2.

In relation to recommendation 7 (to ensure that the officials responsible for the official controls on EU requirements have satisfactory knowledge of the requirements and that arrangements are in place so that relevant data can be ascertained by them and that they are fully aware of the significance of the contents of each certificate they sign) the audit team noted that some actions have been taken (training had been organised, EU legislation had been provided to the CAs responsible for the controls in the EU-approved slaughterhouse).

The system for certification was described in the report 2011-6122 and has remained the same. The meat is exported via South Africa in sealed containers. The consignment is accompanied by a veterinary permit issued by the OV responsible for the supervision of the EU-export establishment. In case the consignment is unloaded into a cold store in South Africa, once the "non-manipulation certificate" is received from the CA of South Africa, the final certificate is issued. The relevant documents were available in the the export files seen by the audit team.

The model health certificate BOV of the Commission Regulation was used for certification.

Observations:

- The CAs have not established a procedure to ensure that the animals had not stayed in the non-approved zone of Swaziland in the last three months and were certifying the three month residency in the approved territory without having the relevant data available.
- The 40-day residence declarations were often filled in incompletely (e.g. number of the removal permit was missing and the identification details of the animals were only filled in at the arrival to the slaughterhouse).
- Swaziland is not approved by the Commission Services to use a collection centre for slaughter cattle before sending them to the slaughterhouse approved for EU export. (See chapter 5.2. for details).
- The documentation of maturation controls was available but lacked some details (such as start and end time of maturation, details of the carcasses in the maturation lot).
- The model veterinary certificate BOV used by the CAs, even after 26 March 2013, was valid only until 26 March 2013. The CA did not have the latest up to date model veterinary certificate BOV available.
- The certificates do not have any safety features to minimise the risk of fraudulent certificates being issued.

5.6.3 Conclusions

The audit team noted some shortcomings in relation to the certification. The certifying officers were certifying for compliance with EU legislation although they did not have all the relevant information available in relation to the animal health requirements given in the model certificate.

6 Overall Conclusion

The control system in place in Swaziland has the necessary elements to provide satisfactory assurances regarding compliance with, or equivalence to, EU requirements as required by Article 46.1(h) of Regulation (EC) No 882/2004. However, the weaknesses noted in relation to animal health controls at slaughter require immediate remedial action.

7 Closing Meeting

A closing meeting was held on 4 February 2014 with the CCA, the NVS. 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. In addition, information on action already taken and planned, in order to address particular findings in the establishments visited, was provided.

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 ensure that the national veterinary service has all the necessary resources to carry out all relevant controls to ensure that the cattle from which the meat is destined for export to the European Union fulfil all the animal health requirements as laid down in Regulation (EU) No 206/2010.
2.	To ensure that the cattle from which the meat derived is destined for export to the European Union are either transported directly from the holding of dispatch to the European Union-export slaughterhouse or that the assembly centre for cattle destined for European Union slaughter is approved by the Commission as an assembly centre for slaughter animals destined to be slaughtered in the European Union-export slaughterhouse, in line with the requirements given in Commission Regulation (EU) No 206/2010.
3.	To ensure that instructions and guidelines on controls for European Union-eligibility cover all requirements as laid down in the model certificate BOV of Commission Regulation (EU) No 206/2010
4.	To complete the identification of national cattle herd and to record all the movements in the electronic database SLITS (Swaziland Livestock Information and Traceability System).
5.	To ensure that the specific controls on foot and mouth disease and maturation in the European Union-export approved slaughterhouse are carried out correctly and

N°.	Recommendation
	documented in sufficient detail.
6.	To ensure the staff carrying out the official controls related to the export of bovine meat to the European Union have access and are kept updated of the relevant European Union legislation.

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=2014-7245

Annex 1 - Legal References

Legal Reference	Official Journal	Title
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. 1935/2004	OJ L 338, 13.11.2004, p. 4-17	Regulation (EC) No 1935/2004 of the European Parliament and of the Council of 27 October 2004 on materials and articles intended to come into contact with food and repealing Directives 80/590/EEC and 89/109/EEC
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
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

Legal Reference	Official Journal	Title
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. 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. 96/93/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
Dec. 2004/432/EC	OJ L 154, 30.4.2004, p. 44-50, corrected and re-published in OJ L 189, 27.5.2004, p. 33	2004/432/EC: Commission Decision of 29 April 2004 on the approval of residue monitoring plans submitted by third countries in accordance with Council Directive 96/23/EC