FINAL REPORT OF AN AUDIT
CARRIED OUT IN
FINLAND
FROM 11 TO 21 MARCH 2014
IN ORDER TO EVALUATE THE FOOD SAFETY CONTROL SYSTEMS IN PLACE
GOVERNING THE PRODUCTION AND PLACING ON THE MARKET OF POULTRY MEAT
AND PRODUCTS DERIVED THEREFROM

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

This report describes the outcome of a Food and Veterinary Office audit in Finland, which took place from 11 to 21 March 2014, in order to evaluate the official food safety control system in place governing the production and placing on the market of poultry meat and products derived therefrom.

The report concludes that Finland has in place an organised official control system based on EU and national legislation, supported by an extensive number of central competent authority guidelines. In general, this control system is applied consistently over time and covers the entire poultry production chain.

However, the control system is weakened by some deficiencies, particularly:

- The training and the supervision by official veterinarians of slaughterhouse staff performing post-mortem inspection in the slaughterhouses.
- The application of derogations, not foreseen under EU rules, in relation to ante- and post-mortem inspection in slaughterhouses applying discontinuous slaughter.
- The insufficient supervision and control of the use of food additives and of labelling of mechanically separated meat.
- Shortcomings at establishment level detected by the audit team which had not previously been noted during official controls.

Moreover, the effectiveness of the system is weakened by the insufficient follow up of the results of the National Internal Audit procedures and some instances of inadequate implementation of the CCA control instructions at local level.

The report includes a number of recommendations addressed to the competent authorities, aimed at rectifying the identified shortcomings and deficiencies and enhancing the implementation of the official control system in place.
# Table of Contents

1 **INTRODUCTION** ........................................................................................................................ 1
2 **OBJECTIVES** ................................................................................................................................. 1
3 **LEGAL BASIS** ................................................................................................................................. 2
4 **BACKGROUND** ............................................................................................................................... 2
   4.1 **PREVIOUS FVO AUDIT** ........................................................................................................ 2
   4.2 **PRODUCTION INFORMATION** ............................................................................................ 2
5 **FINDINGS AND CONCLUSIONS** .................................................................................................... 2
   5.1 **LEGISLATION AND IMPLEMENTING MEASURES** ............................................................... 2
   5.2 **COMPETENT AUTHORITY** ..................................................................................................... 3
   5.3 **OFFICIAL CONTROLS OF PRODUCTION AND PLACING ON THE MARKET** ................... 7
      5.3.1 **CONTROLS AT FARM LEVEL** ...................................................................................... 7
      5.3.2 **APPROVAL PROCEDURES** ......................................................................................... 8
      5.3.3 **ANTE-MORTEM AND POST-MORTEM INSPECTION** .................................................. 9
      5.3.4 **ANIMAL WELFARE AT SLAUGHTER** ....................................................................... 13
      5.3.5 **OFFICIAL CONTROLS AT ESTABLISHMENT LEVEL** ............................................... 14
      5.3.6 **CONTROLS ON FBOs COMPLIANCE WITH MICROBIOLOGICAL CRITERIA FOR FOODSTUFFS – OFFICIAL SAMPLING** ........................................................................ 16
      5.3.7 **CONTROLS ON TRACEABILITY – LABELLING – IDENTIFICATION MARKING** ............. 17
      5.3.8 **CONTROLS ON FOOD ADDITIVES (FA)** .................................................................... 18
   5.4 **RAPID ALERT SYSTEM FOR FOOD AND FEED (RASFF)** ................................................... 18
   5.5 **LABORATORIES** .................................................................................................................... 18
6 **OVERALL CONCLUSIONS** ............................................................................................................ 19
7 **CLOSING MEETING** ..................................................................................................................... 20
8 **RECOMMENDATIONS** .................................................................................................................. 20

**ANNEX 1 - LEGAL REFERENCES** ...................................................................................................... 22
<table>
<thead>
<tr>
<th>Abbreviation</th>
<th>Explanation</th>
</tr>
</thead>
<tbody>
<tr>
<td>CA</td>
<td>Competent Authority</td>
</tr>
<tr>
<td>CCA</td>
<td>Central Competent Authority</td>
</tr>
<tr>
<td>CFU/g</td>
<td>Colony-Forming Units per gram</td>
</tr>
<tr>
<td>DG SANCO</td>
<td>Health and Consumers Directorate General of the European Commission</td>
</tr>
<tr>
<td>EU</td>
<td>European Union</td>
</tr>
<tr>
<td>EVIRA</td>
<td>Finnish Food Safety Authority</td>
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<tr>
<td>EVO</td>
<td>EVIRA's National Food Control Programme</td>
</tr>
<tr>
<td>FA</td>
<td>Food Additives</td>
</tr>
<tr>
<td>FBO</td>
<td>Food Business Operator</td>
</tr>
<tr>
<td>FCI</td>
<td>Food Chain Information</td>
</tr>
<tr>
<td>FINAS</td>
<td>Finnish Accreditation Service</td>
</tr>
<tr>
<td>FVO</td>
<td>Food and Veterinary Office</td>
</tr>
<tr>
<td>HACCP</td>
<td>Hazard Analysis Critical Control Points</td>
</tr>
<tr>
<td>MAF</td>
<td>Ministry of Agriculture and Forestry</td>
</tr>
<tr>
<td>MFCA</td>
<td>Municipal Food Control Authority</td>
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<tr>
<td>MDM</td>
<td>Mechanically Deboned Meat</td>
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<td>MS</td>
<td>Member State</td>
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<td>MSM</td>
<td>Mechanically Separated Meat</td>
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<td>NRL</td>
<td>National Reference Laboratory</td>
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<td>OV</td>
<td>Official Veterinarian</td>
</tr>
<tr>
<td>RSAA</td>
<td>Regional State Administrative Agency</td>
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<td>RTE</td>
<td>Ready-to-eat products</td>
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1 **INTRODUCTION**

The audit took place in Finland from 11 to 21 March 2014 and was undertaken as part of the Food and Veterinary Office's (FVO) planned audit programme.

The audit team comprised two auditors from the FVO. Representatives from the Competent Authority (CA) accompanied the audit team during the whole audit.

2 **OBJECTIVES**

The objective of the audit was to verify, that official controls for poultry meat and products derived therefrom are carried out in compliance with European Union (EU) legislation.

In pursuit of this objective, the audit team proceeded as follows:

- an opening meeting was held on 11 March 2014 with the Central Competent Authority (CCA) in Helsinki. At this meeting the audit team confirmed the objectives of, and itinerary for the audit, and requested additional information required for the satisfactory completion of the audit;
- the following sites were visited:

<table>
<thead>
<tr>
<th>COMPETENT AUTHORITY VISITS</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>CCA</td>
<td>1 Opening and closing meetings</td>
</tr>
<tr>
<td>CAs</td>
<td>2 Municipal authorities</td>
</tr>
</tbody>
</table>

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<tr>
<th>LABORATORY VISITS</th>
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<tbody>
<tr>
<td>Official</td>
<td>1 Municipal Laboratory</td>
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<tr>
<th>PRIMARY PRODUCTION</th>
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<tbody>
<tr>
<td>Farms</td>
<td>1 Broiler farm</td>
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<thead>
<tr>
<th>FOOD PROCESSING FACILITIES</th>
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<tbody>
<tr>
<td>Slaughterhouse</td>
<td>4 One for broilers, one for broilers and turkeys, one for ducks and one (not in operation during FVO visit) for different poultry species</td>
</tr>
<tr>
<td>Cutting plant</td>
<td>3 Two attached to slaughterhouses and one attached to a meat products establishment</td>
</tr>
<tr>
<td>Meat Preparation establishment</td>
<td>4 Two attached to meat products plants, one stand-alone, one attached to a slaughterhouse</td>
</tr>
<tr>
<td>Meat Product establishment</td>
<td>4 Two attached to meat preparations plants, one attached to a cutting plant and one attached to a slaughterhouse</td>
</tr>
<tr>
<td>Mechanically separated meat (MSM) establishment</td>
<td>2 Attached to cutting plants</td>
</tr>
<tr>
<td>Minced meat establishment</td>
<td>1 Attached to a cutting plant</td>
</tr>
<tr>
<td>Cold store</td>
<td>1</td>
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3 LEGAL BASIS

The audit was carried out under the general provisions of EU legislation and, in particular, Article 45 of Regulation (EC) No 882/2004 of the European Parliament and of the Council of 29 April 2004 on official controls in Member States performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules.

A full list of the EU legal instruments referred to in this report is provided in the Annex and refers, where applicable, to the last amended version.

4 BACKGROUND

4.1 PREVIOUS FVO AUDIT

An earlier poultry audit took place in 2009 as part of a general audit to Finland (DG(SANCO 2009-8065). As regards the poultry sector the general audit report concluded that there was a satisfactory control system in place, highlighting however some sanitary shortcomings at establishment level, deficiencies on the performance of post-mortem inspection in slaughterhouses and some problems on the follow up actions in cases of deficiencies.

The report which is published on the Health and Consumers Directorate-General Internet site at http://ec.europa.eu/food/fvo/ir_search_en.cfm made a number of recommendations to the CAs. Written guarantees have been received from the CCA in relation to the implementation of those recommendations

4.2 PRODUCTION INFORMATION

The audit team was informed by the CCA that 103,544 tonnes of chicken meat and edible offal of chicken and 7,400 tonnes of turkey meat and edible offal of turkey were produced in Finland in 2013. There are four large slaughterhouses that produce the great majority of poultry meat in Finland.

5 FINDINGS AND CONCLUSIONS

5.1 LEGISLATION AND IMPLEMENTING MEASURES

Legal requirements


Articles 1(3) (d), Article 1(4) and Article 10 of Regulation (EC) No 853/2004.

Directive 98/34/EC

Findings

The legal power to carry out official controls in food establishments is granted to the CAs by the Food Act 23/2006. However the CA has not legal powers to take appropriate measures following the performance of internal audits (Article 4(6) of Regulation (EC) No 882/2004.) More details below and in Section 5.2.
The implementation of the official control system is based on various government decrees and several CCA guidelines and instructions. The CCA has issued several specific guidance documents covering official controls at poultry meat establishment level, for example:

- Guidelines on establishment controls (No 16003/1).
- Guidelines on poultry meat inspection (LIHA 003/2).
- Guidelines for OV actions in slaughterhouses concerning Food Chain Information (FCI) (No 16005/3).
- Guidelines for the control of food additives based on Regulation (EC) No 1333/2008 (No 17054/3).
- Guidelines on the approval of establishments (No 16033/1).
- Guidelines on the official controls of Regulation (EC) No 2073/2005 (No 10501/1 and No 10502/1).

Concerning the direct supply by the producer, of small quantities of meat from poultry slaughtered on the farm to the final consumer or to local retail establishments directly supplying such meat to the final consumer as fresh meat (Article 1 (3) d of Regulation (EC) No 853/2004), national rules have been adopted, that have been notified to the Commission and Member States:

- Government Decree No 1258/2011 on some operations of minimal risk as regards food safety, and
- Decree No 1367/2011 of the Ministry of Agriculture and Forestry (MAF) on food hygiene in registered food premises.

Concerning low throughput establishments or establishments subject to special geographic constraints (Article 10 (4) a of Regulation (EC) No 853/2004) national measures have been adopted that have also been notified to the Commission and Member States:

- MAF Decree No 1369/2011 on food hygiene in establishments.

Conclusions

While an in depth review of Finnish legislation concerning CA controls in the sector audited was not carried out, the provisions of the legal texts seen by the FVO audit team appear to be in compliance with EU requirements.

CAs have legal power to enforce official controls but not legal powers to take appropriate measures in the light of the results of the internal audits carried-out and this is not in compliance with Article 4(2)(e of Regulation (EC) No 882/2004.

The national rules concerning slaughtering on the farm and low throughput poultry establishments have been notified to the Commission and to the other Member States.

5.2 Competent authority

Legal requirements

Articles 3, 4, 6, 8, 9 and 54 of Regulation (EC) No 882/2004.

Section III of Annex I to Regulation (EC) No 854/2004, in particular Chapter III and IV.
Findings

The structure and organisation of the CAs as well as the control system for food of animal origin is described in the country profile of Finland. This profile can be found in the website http://ec.europa.eu/food/fvo/controlsystems_en.cfm?co_id=FI

In accordance with this description, the Ministry of Agriculture and Forestry (MAF) is responsible for legislation on food of animal origin.

The Finnish Food Safety Authority (EVIRA), under MAF, is the CCA for controls on food of animal origin. EVIRA is responsible for the management, steering and development of food control. EVIRA issues guidelines, organises training and provides information on its website.

In addition, EVIRA is, since 1 September 2011, directly responsible for the official control of poultry slaughterhouses and their integrated activities. The meat inspection in these slaughterhouses is carried out by Official Veterinarians (OV) of the EVIRA Meat Inspection Unit.

At regional level the Regional State Administrative Agencies (RSAAs) carry out controls and audits in the food safety sector. The main task of the RSAAs is to support and audit the Municipal Food Control Authorities (MFCAs). EVIRA enters into an annual agreement with each RSAA for these services.

The direct responsibility for food control lies with MFCAs. The MFCAs are responsible for the approval of poultry meat establishments (besides slaughterhouses) and for the practical implementation of food control in the field. In the cases of five small poultry slaughterhouses the MFCAs retain the responsibility of controls under specific contracts that have been signed with EVIRA.

The CAs have all the legal powers to perform their official controls. Guidelines based on legal provisions have been prepared by the CCA on how to apply administrative actions in cases of non-compliance.

The MFCAs report annually to EVIRA and RSAAs the outcomes of official controls. In order to have better coordination and cooperation within the CAs and to improve the monitoring of controls at central level, an information system (KUTI) is being implemented in stages. The audit team was informed by EVIRA's representatives that KUTI is almost fully implemented for activities related to official controls of poultry meat establishments (KUTI 1 and KUTI 2a). KUTI systems do not, to-date, include data on the controls performed in the primary sector.

Implementation of controls

The audit team visited two MFCA offices responsible for groupings of municipalities (twelve and five respectively). The controls of all the approved establishments under MFCA's responsibility are performed by the local veterinarians and health inspectors of these municipalities.

These controls are documented and regular summaries are produced, including the number of inspections and detailed actions taken. Summaries of the reports are sent to RSAAs, in addition to the annual data.

Despite the comprehensive system of instructions from EVIRA for the local CAs, the audit team noted cases during OV audits that instructions from central level were not always followed at local level. For example the audit team noted shortcomings on the labelling of MSM that were not recorded by the OV despite the fact that detailed guidelines for controls on MSM had recently been sent by EVIRA. In other similar cases, guidelines for enforcement of legal requirements on food additives (more details in chapter 5.3.8) and guidelines for the risk planning of controls (more details in the section Annual Plan of Controls below) were not adequately implemented. Moreover, in one slaughterhouse visited by the audit team that was under MFCA’s responsibility, the service
agreement between EVIRA and MFCA was not respected in all of its parts by the MFCA. The local MFCA did not consider official control of the HACCP system to be part of its duties under the agreement, which led to limited official controls of the own-check system of the establishment (see also official controls at establishment level - implementation of HACCP based procedures).

During its visits to the establishments the audit team reviewed also the official control records and noted that:

- They were based on documented procedures (check lists) and were in general comprehensive.
- The FBO was informed, usually via email, of the corrective actions needed but usually no follow-up was documented.
- Deadlines were not always established after the official controls audits (in some cases it was done only after repeated deficiencies)
- In two establishments visited, despite the fact that deadlines were set after controls, there was no follow-up of the correction of the non-compliances. Some corrective actions were very much delayed (e.g. one year to rectify non-compliances with the requirements of Regulation (EC) No 2073/2005)
- In one case there was no action plan requested to be provided by the FBO after the OV’s audit, despite that deficiencies were noted in the relevant audit report.

The audit team was informed by the CCA that the guidelines on establishment controls (16003/1 annex 4 and 5) include specific forms on the follow up of deficiencies.

Training

There is a detailed training programme at EVIRA that covers the CAs at all levels. RSAAs also provide training for their own staff and officials of the MFCAs. EVIRA has organised several training courses on various aspects of poultry meat controls the last two years, including specific trainings for controls of OVs in slaughterhouses, animal health and animal welfare requirements and risk based planning of controls.

In both MFCAs visited the audit team was informed by the OVs that they participated in several training seminars every year, organised by RSAA or EVIRA. However, documentary evidence of participation to these trainings could not be provided in one of the MFCAs visited. In this case, EVIRA’s representatives explained to the audit team that the lists of participants are traceable as they are always kept in central services.

Verification of Controls

Supervision of the work of EVIRA’s OVs has been organised by the Meat Inspection Unit of EVIRA. The Meat Inspection Unit is responsible for management, development and guiding of operations in slaughterhouses. This unit has so far performed three internal audits to large poultry slaughterhouses (two in 2012 and one in 2013).

Based on the annual service agreements between EVIRA and the RSAAs, the RSAAs have the role of performing audits on the MFCAs. These audits are known as VAMU. EVIRA has issued specific guidelines for VAMU audits that include the audit of planning and implementation of MFCAs’ controls but also of their supervision of establishments. EVIRA also provides the RSAA auditors with instructions on the areas of focus for the coming year’s audits. The RSAAs are obliged to send an annual report to EVIRA every year detailing the outcome of VAMU audits.

The target is that each MFCA would be audited by the RSAA once every three years. The audit team confirmed this frequency of RSAA audits in the MFCAs visited.

Currently, although the obligations of the Food Act and other food legislation are binding directly
on the MFCAs, there is no legal obligation on the MFCAs to act on audit recommendations, and EVIRA and RSAAs do not have the power to require specific actions after the audits.

In one of the MFCAs visited the audit team reviewed the most recent audit carried out by the RSAA in 2012. In addition to EVIRA’s guidelines, the RSAA had focused on specific elements of MFCA official controls, mainly the generation of control reports, the official and food business operators’ (FBO) sampling plans and the assessment of labelling and HACCP plans.

The audit plan included visits to different establishments during which RSAA assessed the performance of MFCA inspectors on site. The RSAA audit report was comprehensive and detailed, revealing several deficiencies in MFCA controls activities. Some of these deficiencies were also noted by the audit team during its visit to the MFCA, e.g. lack of risk assessment for the planning of official controls and no risk categorisation of establishments, difficulties to perform the number of controls required under the National Food Control Programme. The RSAA representative explained to the audit team that there was no follow-up of the results of this audit. Under the three year plan, the RSAA will review progress made and actions taken by the MFCA’s as part of the next planned audit scheduled for 2015.

The audit team reviewed the MFCA responses to RSAA and noted that some corrective actions were mentioned. No inspection reports and no records of enforcement measures (if applied) were included in these responses.

Furthermore, the audit team reviewed the file of controls of one approved establishment producing meat products which had been visited by the RSAA audit team. In this establishment the RSAA audit had detected the lack of application of a HACCP system. The audit team noted that in the action plan provided by the MFCA, after the RSAA audit, the implementation of a HACCP system by the FBO was confirmed. However, this confirmation was given prior to any on-site inspection of the establishment concerned, as the first visit of the MFCA inspectors took place two months after the production of the action plan. The audit team also noted that there was no increase in the frequency of official controls in this establishment according to the MFCA's plan of controls.

These procedures followed by CAs are not totally in line with the requirements of Point 6, of Article 4, of Regulation (EC) No 882/2004 which requires that when internal audits are carried out, the CAs shall take appropriate measures in the light of their results, to ensure that they are achieving the objectives of this Regulation.

Annual Plan of Controls
The MFCAs and the OVs in the slaughterhouses have an annual control plan including control frequency. EVIRA publishes the National Food Control Programme (EVO), which guides Finnish official food control.

The current EVO, for 2011-2014, provides detailed instructions, frequencies of inspection and sampling for the MFCAs involved in official controls in different categories of food establishments. It also includes risk based assessment criteria and a matrix that can be used by MFCAs to determine inspection frequencies.

MFCAs implement a municipal food control plan which is based on EVO and is locally adapted. MFCAs can increase or decrease the set frequency provided by EVO up to a maximum limit of 50%.

However, the audit team noted that this adaptation was not always done or was not documented taking account of the criteria mentioned in Point 1, Article 3, of Regulation (EC) No 882/2004. In one of the two MFCAs visited, the audit team was informed that usually the control plan was based on the availability of own resources (manpower etc.) and not on risk criteria. The audit team also noted, in both MFCAs visited, that when risk criteria are used, very little emphasis is given to the
reliability of own-check programmes of the establishments or an FBO’s past record and consequently the risks associated with those factors have very little impact on the established inspection frequency.

Moreover, when the audit team reviewed the control plans for meat establishments, in the MFCAs visited, it was noted that the planned frequency of inspections was not always respected for 2013. The local authorities mentioned a temporary shortage of staff as the main cause for that.

The audit team was informed by EVIRA’s representatives that EVO guidelines are now being updated, in order for a more precise tool for prioritisation of official controls to be available to MFCAs.

**Conclusions**

CAs responsible for the official control of activities within the scope of the FVO audit are designated as required by Article 4(1) of Regulation (EC) No 882/2004.

The written procedures developed by the CCA, together with the comprehensive training plan organised by EVIRA, provide an appropriate basis for the CAs to adequately implement official controls in the poultry meat sector. However, instructions from central level are not always followed or adequately implemented at local level leading to gaps in the implementation of official control plans.

In cases of non-compliances detected during the official controls, the CA does not always take appropriate actions (e.g. follow up) contrary to the requirements of Article 54(1) of Regulation (EC) No 882/2004.

The system of internal audits performed by RSAA is compromised by the absence of power to impose remedial actions and the limited appropriate measures taken in the light of their results. This is not in line with Article 4 (6) of Regulation (EC) No 882/2004.

A risk based approach to the planning of controls is organised by EVIRA but unevenly implemented by MFCAs as the system does not ensure that the frequency of controls is in all cases proportionate to the risk. In response to this situation the CCA plans to proceed with the adoption of new planning tools.

5.3 **OFFICIAL CONTROLS OF PRODUCTION AND PLACING ON THE MARKET**

5.3.1 **Controls at farm level**

**Legal requirements**

Article 3 of Regulation (EC) No 882/2004
Annex I to Regulation (EC) No 852/2004,
Article 4 (2) of Regulation (EC) No 854/2004

**Findings**

The Salmonella detection level in the poultry meat production is very low in Finland and a Salmonella National Control Programme is in place for the various poultry populations. Furthermore, under national legislation a monitoring programme for Campylobacter is also implemented for broilers.

The audit team visited one broiler farm supplying birds to one slaughterhouse also visited by the team. The poultry farm was registered by the municipality which maintains a list of registered poultry farms. The arrival of new flocks in the farms is notified to the MFCA by the hatcheries. The audit team verified this practice in one of MFCAs visited and it was correctly implemented.
The farm visited was kept in adequate sanitary conditions and applied satisfactory bio-security measures.

The OV, once a year, visits the farm to take official samples for Salmonella monitoring. During this visit the OV checks also the implementation of the FBO's Salmonella sampling plan and among others the records of illnesses and of deaths of birds, the hygiene and biosecurity of the premises. A comprehensive checklist is used by the OV covering these items. However, the OV verified the application of practices dealing with these issues (pest control and cleaning of houses between different flocks) despite the fact that the farmer did not keep any relevant records.

A Medication log book was not kept as the FBO explained that antibiotics were not used. However, the use of feed containing coccidiostats was appropriately recorded.

Birds are transported from the farms to the slaughterhouses with food chain information (FCI) in accordance with Regulation (EC) No 853/2004. All the FCI documents reviewed by the audit team contained information on the Salmonella test results. The audit team noted that Salmonella samples were taken within three weeks before slaughter of the birds in line with EU requirements.

**Conclusions**

Regular official controls on the poultry farms to verify FBO compliance with provisions of Regulation (EC) No 852/2004 are implemented as required by EU legislation (Article 4(2) of Regulation (EC) No 854/2004).

### 5.3.2 Approval procedures

**Legal requirements**


**Findings**

The slaughterhouses and establishments adjacent to them are approved by EVIRA. All the other poultry meat establishments are approved by the MFCAs.

EVIRA keeps a central, national register of approved establishments which is publicly available on its website. It has also published guidelines for the authorities (MFCAs), on its website, on the procedure for approval, withdrawal and suspension of establishments.

All establishments visited by the audit team had been re-approved after 2009 according to EVIRA’s plan and for all activities carried out. The audit team reviewed documents relating to approval and re-approval of establishments and noted that:-

- The approval documents of the slaughterhouses (slaughtering more than one poultry species) and cutting establishments (cutting poultry meat and red meat) do not always specify the kind of poultry species or the kind of meat that can be used (this is only specified in the initial application of the FBO).
- One establishment was still approved for the production of meat products even though it has not undertaken this activity since 2008 and no longer has appropriate facilities for this form of production. This discrepancy had not been noted or corrected by the CA during the official controls.
Conclusions

Establishment approval procedures are in place and in general in line with relevant EU requirements. However, the system does not ensure that all the activities concerned are specified and that the list maintained is fully up-to-date. This is not in line with Article 31(2) of Regulation (EC) No 882/2004.

5.3.3 Ante-mortem and post-mortem inspection.

Legal requirements


Findings

The audit team visited two large slaughterhouses under the responsibility of EVIRA and two smaller slaughterhouses that apply discontinuous slaughter as they operate only some days of the month.

General findings:
The ante-mortem inspection is always performed at slaughterhouse level and is always carried out by an OV.

The OV verifies also compliance with relevant EU rules on animal welfare during the transport of birds to the slaughterhouse.

The ante-mortem inspection consisted of:

- Documentary check;
- Identification of the consignment of birds;
- Animal welfare check;
- Clinical inspection of birds.

Duly completed FCI documents signed by the farmer were available at all the slaughterhouses visited.

Regarding post-mortem inspection and the OV's audit controls, the procedures followed were different depending on the size of the slaughterhouse concerned.

Specific findings in the large slaughterhouses (slaughtering more than 150,000 birds per year) visited:

Ante-mortem inspection:
The audit team was provided with documentary evidence that the ante-mortem inspection is carried out by the OVs and consisted of:-

- Documentary check (including examination of the FCI).
- Identification of the consignment of birds.
- Animal welfare check.
- Clinical inspection of birds.

The ante-mortem inspection is carried out in line with EU requirements in the two large slaughterhouses visited.

Post-mortem inspection:

Post-mortem inspection is carried out by slaughterhouse staff under supervision of the OV. The
CCA informed the audit team that there are no official auxiliaries in poultry slaughterhouses in Finland.

The supervision and direction of slaughterhouse staff is organised according to the MAF Decree on Meat Inspection 1470/2011 4§. Under this decree the OV is responsible for carrying out regular performance tests covering slaughterhouse staff participating in post-mortem inspection.

In both slaughterhouses visited the post-mortem inspection points were in general well equipped and clearly designated and the records of the results of post-mortem inspection were available.

However the FVO audit team noted several points that were not in compliance with EU requirements:

- Insufficient training of slaughterhouse staff performing post-mortem inspection. Only limited number of staff had attended training sessions in accordance with the requirements of Chapter III of Section III of Annex I to Regulation (EC) No 854/2004. The most recent training on this subject was organised by EVIRA in 2009. The audit team was informed that out of fifty five slaughterhouse staff carrying out post-mortem inspection in the two slaughterhouses, only thirty two had participated in such training. In one of the slaughterhouses the audit team was informed that practical training on post-mortem inspection was provided to staff (newcomers) by the OV in charge of slaughterhouse. In the other slaughterhouse, there were no provisions for training of newcomers and no evidence of such training provided to them by the OV. In this slaughterhouse, the audit team was informed that the OV is not involved in the newcomers’ induction training as this is considered the responsibility of the FBO.

- Insufficient supervision of the slaughterhouse staff by the OV. Under national legislation the OV in charge of a slaughterhouse is responsible for regular performance tests on slaughterhouse staff. However, in one slaughterhouse these tests started to be applied by the OV in January 2014 (based on his own criteria) and in the second have not yet been applied. The CCA has not set specific criteria or guidelines for the regular performance tests of slaughterhouse staff involved in post-mortem inspection. This is not in line with Point A (a), Chapter III, Section III, Annex I of Regulation (EC) No 854/2004. The audit team was informed that a guide is now being developed by EVIRA in order to highlight this requirement.

- The slaughterhouse staff performing post-mortem inspection are not always independent from the production staff as required by Point 6(a) (ii), Article 5 of Regulation (EC) No 854/2004. In one of the two large slaughterhouses visited, the staff carrying out post-mortem inspection engaged in other tasks on the production line during the day. In this slaughterhouse, out of one hundred employees, thirty have been appointed to perform PMI tasks in addition to their tasks in the production line.

- In one slaughterhouse, the staff designated for post-mortem inspection performed slaughtering activities (removal of neck skins, evisceration of carcasses, washing of cavities, etc.) at the designated post mortem–inspection points. No extra inspection activities were performed at these post mortem-inspection points by this staff.

The audit team reviewed the records kept by the OVs on the post-mortem inspection results in both slaughterhouses visited and noted that:-

- Daily inspections of the viscera and the body cavities of a representative sample of birds were not performed by the OVs as required in Point B I(a), Chapter V, Section IV, Annex I of Regulation (EC) No 854/2004.

- In one of the slaughterhouses, the detailed inspection of a random sample of birds declared
unfit for human consumption was documented but according to these documents it was not performed for each batch of birds (it was done, on average, twice per month with large intervals during the summer). This is not in line with Point B 1(b), Chapter V, Section IV, Annex I of Regulation (EC) No 854/2004.

Specific findings in the slaughterhouses carrying out discontinuous slaughter:
The audit team was informed by the CAs that in two slaughterhouses visited; derogations are applied covering the presence of the OV during the post-mortem inspection, in accordance with Point 2, Annex VIb of Regulation (EC) No 2074/2005.

Slaughterhouse under MFCAs responsibility:
The slaughterhouse handles a variety of poultry species, operating only some days per year (thirty eight days in total during 2013). The audit team was informed by the FBO that the daily number of birds slaughtered depends on the species and can be up to 4500 birds.

The slaughterhouse was not in operation during the visit so the audit team was not able to assess the hygiene level of the activities performed.

Although requested by the audit team, the CAs could not demonstrate that derogations, concerning the presence of the OV in the slaughterhouse during post-mortem inspection, were granted. The OV explained to the audit team that it was only orally sanctioned (via phone) by EVIRA for this establishment to apply derogations.

Moreover, the audit team noted that there was no risk analysis justifying this derogation as required by Point 2, Chapter II, Section III, Annex I to Regulation (EC) No 854/2004 which indicates that the CA has to carry out a risk analysis to avail of this flexibility (in the case of discontinuous slaughter) taking into account requirements detailed in Annex VI.b, Point 2 of Regulation (EC) No 2074/2005.

The audit team was informed by the CAs that the OV visits the slaughterhouse once per slaughtering day (or twice if two different batches of birds are slaughtered). During the visit, the OV performs the ante--mortem inspection of the birds and supervises the post-mortem inspection. In addition, the OV inspects a sample of birds that are declared unfit for human consumption following the post-mortem inspection.

However, the OV explained also the audit team that:-

- The post-mortem inspection is performed by one trained member of the slaughterhouse staff and not by an official auxiliary.
- Not all the birds are subject to ante-mortem inspection as the slaughter starts before the OV arrives in the slaughterhouse.
- The FCI accompanying the birds is examined after the beginning of the slaughter.
- When the OV is not present, carcasses and offal with abnormalities are discarded by the slaughterhouse staff and are not available to the OV for examination at a later date.

These practices are not foreseen by Point 2 (a), Annex VIb to Regulation (EC) No 2074/2005 which provides for specific conditions to be complied with in order for the OV not to be present at all times during post-mortem inspection (e.g. an official auxiliary to perform post-mortem inspection). Furthermore, they are not in line with the general requirements of Chapter II (A and B), Section I and Chapter I, Section III and the specific requirements of Chapter V (B), Section IV, of Annex I to Regulation (EC) No 854/2004 (regarding ante-mortem inspection, checks on the food chain information and tasks of the OV during post mortem inspection).
Moreover, the audit team reviewed the inspection records completed by the OV and noted several cases of high number of condemned carcasses or parts of carcasses. The audit team noted that in these cases:

- The OV did not perform any further investigations necessary when there is reason to suspect that the meat from the birds concerned could be unfit for human consumption as per Point B(1c), of Chapter V, of Section IV, of Annex I of Regulation (EC) No 854/2004.

- In cases of high mortality of the flock (11%) indicated on the FCI documents this was not taken into account when ante-mortem inspection and post-mortem inspection were carried out, as required under Point A(1), of Chapter II, of Section I, of Annex I of Regulation (EC) No 854/2004. No feedback was provided by the OV to the farmer on the birds as required under Point 2, of Chapter I, of Section II, of Annex I of Regulation (EC) No 854/2004.\(^1\)

The audit team was further informed by EVIRA that from 9 April 2014 this slaughterhouse will be under its responsibility.

Farm located slaughterhouse under EVIRA’s responsibility:

The audit team visited one approved farm located slaughterhouse for ducks which is in operation one day per week. The responsibility for controls on this slaughterhouse has been gradually passed to EVIRA during 2013.

The audit team was informed by the CA that derogations on structure and equipment according to MAF Decree 1369/2001 were also applied in this slaughterhouse. However, no official, documented authorisation of these flexibility arrangements was available to the audit team. There was no indication in the approval document for the establishment or other official document identifying which specific derogations applied. The OVs responsible for the controls of the slaughterhouse informed the audit team that they were not aware of the derogations allowed when the establishment was re-approved in 2009 but they applied flexibility arrangements by their own initiative.

During the visit the audit team noted, that in general, the hygiene conditions of the slaughterhouse were met EU requirements.

During the visit to the slaughterhouse the audit noted that the OV is not normally present during the slaughter day as derogations according to Annex VIb of Regulation (EC) No 2074/2005 were applied. Ante-mortem inspection was performed by the OV the day before and post-mortem inspection the day after the slaughter. The audit team noted that the post-mortem inspection included only the inspection of the liver, the heart and the gizzard as the rest of the offal was discarded by the FBO on the day of slaughter. In addition, there was no correlation between offal and carcasses as each of them were inspected separately. These practices are not in line with point D (1), Chapter II, Section I, Annex I of Regulation (EC) No 854/2004. However, the FBO informed the audit team that when he has suspicions he keeps both carcasses and accompanying offal available for the next day’s post-mortem inspection by the OV.

Since January 2013, two or three times per year, another OV of EVIRA visits the slaughterhouse in order to perform an audit. The audit team reviewed documents of reports of these audits and follow-up actions relevant to them which were consistent and detailed.

The audit team reviewed also the ante-mortem inspection and post-mortem inspection records of the previous months and noted that until October 2013 (when the responsibility of the slaughterhouse passed from MFCA to EVIRA) the OV visited the slaughterhouse only one day per week, the day before the slaughter, in order to perform an ante-mortem inspection of the birds. This

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\(^1\) In their response to the draft report the CA noted that this high mortality was in breeding flocks for broilers, which are older birds than broilers.
visit day the OV performed and documented also the post-mortem inspection of the birds that had been slaughtered the previous week. However, the FBO informed the audit team that all the carcasses were vacuum packed the day after the slaughter and the majority of them had been dispatched two days later and so they were not in the slaughterhouse when the post-mortem inspection documents were signed by the OV. EVIRA’s representatives informed that audit team that this practice was not in line with the relevant guidelines issued by the CCA.

Conclusions
Ante--mortem inspection was in general carried out in line with EU requirements with the exemption of one case.

Concerning post-mortem inspection, the control system in place does not comply with Article 5 (6) of Regulation (EC) No 854/2004 particularly with regard to training and duties of slaughterhouse's staff involved in post-mortem inspection and their supervision by the OV. This is a repetition of a finding of the 2009 FVO audit on the poultry meat sector.

In addition, the OV does not always carry out personally the checks required under Point B, Chapter V, Section IV, Annex I to Regulation (EC) No 854/2004.

The flexibility arrangements (according to Article 10 (4)(b) of Regulation (EC) No 853/2004) and the derogations on the OV presence during post-mortem inspection (according to Annex VI.b, Point 2 of Regulation (EC) No 2074/2005) that are applied in slaughterhouses with discontinuous slaughter have not been formally authorised and documented. This causes misunderstandings for the OVs performing official controls leading to irregularities regarding the performance of ante and post-mortem inspections.

Moreover, some of these derogations applied regarding the presence of OV in establishments carrying out discontinuous slaughter do not fall within the scope or permitted under Regulation (EC) No 2074/2005.

5.3.4 Animal welfare at slaughter

Legal requirements
Articles 3, 4 and 5 of Council Regulation (EC) No 1099/2009 on the protection of animals at the time of killing

Findings
Animal welfare checks during slaughter were carried out by the FBOs in line with EU requirements and in all but one visited slaughterhouses.

Official control reports covered animal welfare issues at slaughter in all the slaughterhouses visited. However, the audit team noted that:-

- in the farm located slaughterhouse mechanical percussion was used for the routine stunning of the birds which is not in line with Article 4 of Regulation (EC) No 1099/2009 and the methods permitted to be used for stunning according to Annex I of the same Regulation. The audit team noted during its visit that the OV was assessing the stunning effectiveness of this method with the use of a specific checklist without finding any problems. However, the audit team also noted that the birds had several signs of consciousness during the bleeding, such as lifting of the head, moving of legs and flapping of wings.

Conclusions
Animal welfare requirements in slaughterhouses visited were found to be generally respected and subject to official control with the exemption of a small farm located slaughterhouse.
5.3.5 **Official controls at establishment level**

**Legal requirements**


**Findings**

**General findings:**

All the establishments visited were under regular official control. Records of official controls were always available to the audit team.

The audits by the OV were performed with the use of a specific checklist (ABCD form) that was provided by EVIRA.

**Regarding the construction and the equipment:**

- in both the large slaughterhouses visited, the vehicles used for the transportation of live birds were cleaned at the point where birds were unloaded. In one case, clean bird cages were stored in close proximity. This is not in line with point 6(b), Chapter II, Section II, Annex III of Regulation (EC) No 853/2004.

- in one slaughterhouse, the mechanism of slaughter line passed close to de-fathering equipment (open machine) after plucking and de-feathering resulting in exposed carcasses remaining for a long time in this area with potential cross-contamination.

**Regarding the hygiene of the operations:**

- no constant progress of works during cutting and packaging of meat and as a result accumulation of meat in these areas, in both slaughterhouses visited. In one of the two slaughterhouses this led to temperatures outside the limit of 4°C of the meat during the audit team visit, deviation that was recorded on the own-check documents of the establishment. Despite the fact that these were long standing issues they had not been recorded by the OV during preceding official controls.

- in one establishment the work layout could not ensure that the flow of operations would not cause cross contamination (incoming unpackaged meat was transported through the place of storage of final product, a cutting room that was used as a passage for incoming packaged meat).

- excessive splashing of water was observed in points on the slaughter line close to exposed meat in one large slaughterhouse.

- chemicals, wrapping materials, spices and food additives being stored together and in close proximity to each other.

- liquid mixes of spices being stored despite their best before dates having expired.

- lack of cleaning and sanitation of shoes before the entrance to the production rooms. The staff entrance to the production area was through the staff canteen in two establishments visited.

- cleaning of equipment in the place of storage of already cleaned equipment, and in the place that meat was prepared in the same time (e.g. filling of sausages). Storage of clean containers in corridors.

- inadequate separation between clean and dirty areas and practices leading to contamination risks in one poultry meat processing establishment: Absence of doors, presence of cooked meat while cleaning with high water pressure was taking place in proximity, crossing of flows of personnel and heat treated ready to eat products (RTE).
Regarding the maintenance of the establishments:

- Peeling of paint close to exposed product, floors not maintained in a sound condition and not easy to clean and disinfect in some areas, pooling of dirty - bloody water on parts of the floor in one of large slaughterhouse, ice formation and condensation with evidence of leaking on exposed RTE.
- Heavy ice formation on the ceiling of the freezer with evidences of wet and damaged boxes caused by the ice.
- In the slicing room of final RTE there was damaged and rusty equipment in close proximity to exposed product. Rusty equipment was also in contact with the wrapping material of this product.

Regarding the implementation of HACCP based procedures

Adequate HACCP plans were implemented in all the establishments visited and were regularly audited by the CAs with the exception of one slaughterhouse under MFCA’s responsibility.

In this slaughterhouse the audit team examined the frequency and the level of official controls (audits) performed by the MFCA. According to the service agreement between EVIRA and the MFCA the responsibility for audit lies fully with the latter since September 2013 (after a six month transition period). However, the MFCA, had not performed any audit in the establishment since that date. The last audit of the establishment was performed by EVIRA in July 2013.

In meat processing establishments visited critical control points (CCPs) such as heat treatment points, use of nitrites in meat products, smoking process and contamination with Polycyclic Aromatic Hydrocarbons and storage temperatures of final products were adequately monitored.

However, the audit team observed some operational deficiencies relevant to HACCP systems that had not been previously detected by the OV’s (not all deficiencies found in all establishments visited):

- In one cutting plant the temperature of chilled meat monitored by the FBO as a CCP in its HACCP plan was repeatedly and frequently above the limit of 4ºC. As a corrective action the addition of ice was always used. No deeper analysis was carried out to address this problem.
- In another plant, approved for the cutting of meat of different poultry species, possible contamination risks between different batches and different species had not been assessed in the hazard analysis of the HACCP plan and no precautions were taken to avoid such problems. This is not in line with Point 1(a)(ii), Chapter III, Section II, Annex III to Regulation (EC) No 853/2004 and Point 1(c), Chapter V, Section II, Annex III to the same Regulation.
- The temperature of meat was not monitored during production in one establishment with cutting and meat preparations production. This element was not included in establishment’s HACCP system.

Conclusions

Official controls are carried out regularly at all stages of the production chain for poultry meat and products derived therefrom and in general these controls are in line with EU requirements.

The premises visited by the audit team were generally in compliance with EU requirements. However, the CA controls don't ensure that the establishments meets all the relevant requirements foreseen in Regulation (EC) No 853/2004 (in particular regarding the hygiene of the operations, maintenance of establishments and deficiencies related to the implementation of HACCP plans).
5.3.6 Controls on FBOs compliance with microbiological criteria for foodstuffs - official sampling

Legal requirements


Findings

FBO sampling activities

In all the establishments visited there was a comprehensive FBO sampling plan. Microbiological analyses of products, water and surfaces were carried out in an FBO laboratory or in external laboratories and in most cases the results of these analyses were compliant.

Processing establishments regularly check for the presence of Listeria in RTE and on the equipment in contact with such products.

The verification of FBO sampling plans is part of official controls.

However, the audit team noted that:

- in one establishment, according to the own-check sampling records, one sample was taken instead of the five required under Regulation (EC) No 2073/2005 when final products (fresh cut meat and MSM) were sampled for Salmonella. This non-conformity did not trigger any official reaction.

- in two establishments producing RTE the implementation of certain requirements of Annex II of Regulation (EC) No 2073/2005 was inadequate. The audit team noted that there were no shelf life studies for the RTE products that can support the growth of Listeria monocytogenes (smoked or cooked turkey ham products, sliced and packaged in vacuum or modified atmosphere) as required in Article 3(2) of Regulation (EC) No 2073/2005. Furthermore, in one of the two establishments visited the maximum limit for Listeria was defined at 100 CFU/g despite the fact that, the manufacturer had no specific study to justify that the products would not exceed this limit throughout their self-life.

- in one establishment with MSM production, despite the fact that unsatisfactory results on process hygiene microbiological criteria were observed for long time, adequate corrective actions had not been taken by neither the FBO nor the CA and the problem still exists.

Official sampling

According to the Finnish Food Act (23/2006) the CA must have an official sampling plan as part of its official control programme. The sampling plan should cover sampling frequency and the different laboratory analyses. The official sampling frequency should be risk-based and depends on compliance of the FBO and results of their own-check program and sampling.

The audit team reviewed these sampling plans in the MFCAs visited and found them to be in line with EU and the national provisions.

Conclusions

The official sampling programme is well organised and extensive.
The FBOs own-check sampling programmes on poultry meat and products derived therefrom are, in most cases, implemented in compliance with Regulation (EC) No 2073/2005. However, in the establishments producing RTE official controls do not ensure the compliance of FBOs with all the requirements of this Regulation.

5.3.7 Controls on traceability – Labelling – Identification marking

Legal requirements

Traceability: Article 4.6 of Regulation (EC) No 854/2004

Findings

Evidence was provided to the audit team that checks on traceability, identification mark and labelling are part of official controls.

Traceability systems were in place in the establishments visited. However, the audit team noted that:

- The CA did not perform traceability checks in the cold store visited by the audit team. The OV informed the audit team that according to her opinion she was not responsible to do these checks and she had no specific instructions/guidance on how to do traceability controls.

Labels and identification marks were correctly applied in all the establishments visited. However, the audit team noted deficiencies not previously recorded by the OV, regarding:

- a label on the incoming poultry meat in a processing establishment that had an indication of maximum storage temperature at +6°C.

- the information on packages of MSM produced for other processing establishments. In one of the two MSM establishments visited, MSM under point 4, Chapter III, Section V of Annex III to Regulation (EC) No 853/2004 was indicated as “backbone chicken meat”. In both establishments the denomination MDM (Mechanically Deboned Meat), instead of MSM.

Despite the guideline of EVIRA in July of 2013 asking the OVs to pay attention on MSM labelling, no action was taken in these cases.

Conclusions

Satisfactory traceability systems were in place in the establishments visited. With the exemption of the cold store visited, traceability checks are regularly performed by the CAs during official controls.

Labels and identification marks in establishments visited were correctly applied and their application was under regular official control.

The controls performed by the Finnish CAs do not ensure that establishments producing MSM apply the correct denominations on the product.

5.3.8 Controls on food additives (FA)

Legal requirements
Regulation (EC) No 1333/2008 on food additives

Findings
In all poultry meat processing establishments visited the use of food additives was covered by the HACCP system. The audit team noted that several parameters were monitored like the composition requirements of the additives used, the specifications of pre-mixes used, the quantity of nitrates added in incoming materials and the use of additives in line with to good manufacturing practices.

However, the audit team noted limited inspections by the OV on the use of food additives in establishments producing meat preparations. This led to the use of some additives, such as nitrates and phosphates, in the production of meat preparations (e.g. salted or marinated chicken fillets) which is not in line with EU legislation.

Despite the fact that checks on food additives were included in the OV duties and relevant parameters were set out in the checklists used and in recent guidelines issued by EVIRA (in 2013), these deficiencies had not been recorded by the OVs.

The audit team was informed by EVIRA that a new guidance aimed at official control staff is being prepared on food additives permitted in meat preparations.

Conclusions
The CAs do not always perform comprehensive controls on the use of food additives which has led to the use of some additives in meat preparations by FBOs that are not in line with EU legislation.

5.4 Rapid Alert System for Food and Feed (RASFF)

Legal requirements

Findings
There have been no RASFF notifications triggered for Finish poultry meat and products derived therefrom since the beginning of 2008.

5.5 Laboratories

Legal requirements
Articles 11, 12 and 33 of Regulation (EC) 882/2004

Findings
All laboratories in Finland involved in the official control or FBO own-check analyses must be approved by EVIRA. EVIRA maintain a list of approved laboratories for official control.

EVIRA does not carry out supervision visits to approved laboratories. It has a contract with the Finnish Accreditation Service (FINAS) for the assessment of the approved laboratories. FINAS regularly transmits to EVIRA reports of audit visits carried out in the approved laboratories including the scope of accreditation. All laboratories approved to carry out analyses for official controls have to be accredited.

The audit team was informed that laboratories have to carry out proficiency testing on accredited
methods at least once every three years and send the results to EVIRA. The Finnish National Reference Laboratory (NRL) does not organise proficiency testing and the approved laboratories select the proficiency tests they wish to participate in without any guidance or direction from the NRL.

The audit team visited one local official laboratory carrying out microbiological analyses on both official and own-check samples. The audit team was informed by the laboratory that in 2013 around 20,000 samples were microbiologically analysed.

The laboratory visited is accredited against ISO standard 17025 and the results of proficiency tests for microbiological parameters were satisfactory.

The audit team noted that the laboratory’s accreditation included all the EU reference methods laid down in Regulation (EC) No 2073/2005 and it is valid for four years. The conditions of this accreditation are verified annually by FINAS during its laboratory audits. The reports from these audits were available to the audit team who noted that during the most recent audit no deficiencies had been recorded.

Conclusions

6 Overall Conclusions

Finland has in place an organised official control system based on EU and national legislation, supported by an extensive number of central competent authority guidelines. In general, this control system is applied consistently over time and covers the entire poultry production chain.

However, the control system is weakened by some deficiencies, particularly:

- The training and the supervision by the OV of slaughterhouse staff performing post-mortem inspection in the slaughterhouses.
- The application of derogations, not foreseen under EU rules, in relation to ante-mortem inspection and post-mortem inspection in slaughterhouses applying discontinuous slaughter.
- The insufficient supervision and control of the use of food additives and of labelling of MSM.
- Shortcomings at establishment level detected by the FVO team which had not previously been noted during official controls

Moreover, the effectiveness of the system is weakened by the difficulties of the CAs involved in Internal Audit in following – up and taking appropriate measures when these audits detect problems and by some instances of inadequate implementation of the CCA control instructions by CA at local level.

7 Closing Meeting

During the closing meeting held in Helsinki on 21/03/2014, the audit team presented the findings and the preliminary conclusions of the audit to the CAs.

During this meeting, the CAs acknowledged the findings and preliminary conclusions presented by
the audit team and provided a commitment to correct the deficiencies. More in particular, the audit team was informed that the OV in the farm located slaughterhouse had applied enforcement measures in order to change the stunning method used.

8 RECOMMENDATIONS

The CCA should provide the Commission services with guarantees and an action plan, including a timetable for its completion, within twenty-five working days of receipt of the report, in order to address all the deficiencies identified and in particular the following recommendations:

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<tr>
<th>No.</th>
<th>Recommendation</th>
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<tbody>
<tr>
<td>1.</td>
<td>The CCA should ensure that CAs responsible for carrying-out internal audits have the legal powers to take appropriate measures in the light of their results (Article 4 (6) of Regulation (EC) No 882/2004) as required in Article 4(4) of Regulation (EC) No 882/2004.</td>
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<td>2.</td>
<td>The CCA shall ensure that CAs responsible for the official controls carry-out them in accordance with documented procedures as required by Article 8(1) of Regulation (EC) No 882/2004, in particular they should implement the instructions issued by the central level.</td>
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<tr>
<td>3.</td>
<td>The CCA shall ensure that when non-compliance are detected during official controls adequate actions (e.g. follow-up) are carried-out in order to ensure that FBOs remediate the situation as foreseen in Article 54 of Regulation (EC) No 882/2004.</td>
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<td>4.</td>
<td>The CA should ensure that a risk based approach is always used for the planning of controls as required in Article 3 (1) of Regulation (EC) No 882/2004.</td>
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<td>5.</td>
<td>The CA should ensure that the list of approved establishments is maintained up-to date, particularly concerning the specific activities actually performed (Article 31.2(f) of Regulation (EC) No 882/2004).</td>
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<td>6.</td>
<td>The CA must ensure that slaughterhouse staff involved in post-mortem inspection meets the requirements laid down in point 6 (a) (i) and (ii) of Article 5 and Chapter III, Section III of Annex I to Regulation (EC) No 854/2004, particularly concerning training and duties allocated, and their supervision by the OVs.</td>
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<td>7.</td>
<td>The CA should ensure that, regarding the post-mortem inspection, the OV carries out personally the checks required under Point B, Chapter V, Section IV, Annex I to Regulation (EC) No 854/2004.</td>
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<td>8.</td>
<td>The CAs should ensure that any adaptation made by the CA to the procedures covering the presence of OVs in slaughterhouses is based on risk analysis as required in Paragraph 2, Chapter II, Section III, Annex I of Regulation (EC) No 854/2004 and complies with the conditions set out in Point 2, Annex VIb to Regulation (EC) No</td>
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<td>2074/2005</td>
<td>The CAs shall ensure that FBOs comply with the requirements laid down in Regulation (EC) No 853/2004 as required in Article 4 of Regulation (EC) No 854/2004, in particular that slaughterhouse and establishments under their responsibility meet the requirements laid down in Annex III, Sections II and V of Regulation (EC) No 853/2004.</td>
</tr>
<tr>
<td>10</td>
<td>The CA should ensure that controls over Regulation (EC) No 2073/2005 include all relevant requirements of the Regulation and in particular the application of shelf-life studies for ready to eat products that can support the growth of Listeria monocytogenes.</td>
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<tr>
<td>11</td>
<td>The CA should ensure that MSM to be supplied to other processing establishments is accompanied by the correct information which allows proper use according to Regulation (EC) No 853/2004.</td>
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<tr>
<td>12</td>
<td>The CA should ensure that the food additives used for the production of products derived from poultry meat are those authorised in the Union list laid down in Regulation (EC) No 1333/2008 and are approved and used for the specific category of food in accordance with Part E of Annex II to the same Regulation.</td>
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The competent authority's response to the recommendations can be found at:

<table>
<thead>
<tr>
<th>Legal Reference</th>
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