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HEALTH & CONSUMER PROTECTION DIRECTORATE-GENERAL  
Directorate F - Food and Veterinary Office

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FINAL REPORT OF A MISSION  
CARRIED OUT IN THE NETHERLANDS  
FROM 30 JANUARY TO 10 FEBRUARY 2006  
IN ORDER TO EVALUATE OFFICIAL CONTROLS  
RELATED TO THE SAFETY OF FOOD OF ANIMAL  
ORIGIN, IN PARTICULAR MEAT, MILK AND THEIR PRODUCTS  
AS WELL AS ANIMAL WELFARE AT THE TIME OF  
SLAUGHTER OR KILLING

*Please note that factual errors in the draft report have been corrected and that clarifications provided by the Dutch Authorities are given as footnotes, in bold, italic, type, to the relevant part of the report.*

## *SUMMARY*

The Food and Consumer Product Safety Authority (*Voedsel en Waren Autoriteit VWA*) is now the only central competent authority in the meat and dairy sectors. An independent quality control institute (COKZ) performs the official controls on dairy establishments and an independent Foundation (KDS) is in charge of post-mortem inspections. Post-mortem inspection has been delegated to KDS before being accredited according to the EN 45004 and before having a sufficient number of qualified experienced staff.

Although the coordination between the different competent authorities is good, some problems have been detected by the mission team in the internal coordination and communication of the VWA departments.

The competent authorities have developed a new official control system which was implemented in January 2006 and includes comprehensive procedures and instructions. The design of the system of official controls and the training programme developed for VWA staff are in general in line with EU requirements. However, the early stage of implementation in the meat sector limits the degree to which a full assessment can be made of its efficacy and of the appropriateness of the frequencies set. In the dairy sector, the official controls are very similar as they were before and the implementation was more advanced.

Official certification was found to be reliable in the meat sector but with some weak points in the dairy sector.

Registration and approval of establishments is proceeding. The food business operators complied generally with the obligations laid down in the EU legislation.

The official controls are performed effectively for water quality, temperature requirements, application of health marks and ante mortem inspection.

Problems have been detected in the post mortem inspections, *Trichinella* investigation in meat and official controls on animal welfare in slaughterhouses. The lack of assessment of own controls (especially the microbiological results) and weak enforcement in some cases have also been pointed out during this mission as deficiencies.

Although animal by-products were not included in the objectives of the mission, lack of identification of containers, incorrect storage and lack of transport documents were detected in different establishments. In the dairy sector, the coordination between the VWA and COKZ in this field was found inadequate<sup>1</sup>.

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<sup>1</sup> *For the comments of the Dutch authorities on this point, please see footnote 3*

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## ABBREVIATIONS & SPECIAL TERMS USED IN THE REPORT

ABP	Animal by products
CCA	Central competent authority
CA	Competent authority
COKZ	Central body for Dairy Quality ( <i>Centraal Orgaan voor Kwaliteitsaangelegenheden in de Zuivel</i> )
EU	European Union
FVO	Food and Veterinary Office
HACCP	Hazard Analysis and Critical Control Points
KDS	Animal Sector Quality Inspection ( <i>Kwaliteitskeuring Dierlijke Sector</i> )
KvW	Inspectorate for Health Protection and Veterinary Public Health ( <i>Keuringsdienst van Waren</i> )
LNV	Ministry of Agriculture, Nature and Food Quality ( <i>Ministerie van Landbouw natuur en voedselkwaliteit</i> )
MSM	Mechanically separated meat
OV	Official veterinarian
RVV	National Inspection Service for livestock and Meat ( <i>Rijksdienst voor de Keuring van Vee en Vlees</i> )
SH (s)	Slaughterhouse (s)
VWA	Food and Consumer Product Safety Authority ( <i>Voedsel en Waren Autoriteit</i> )
VWS	Ministry of Health, Welfare and Sport ( <i>Ministerie van Volksgezondheid, Welzijn en Sport</i> )

## 1. INTRODUCTION

The mission took place in The Netherlands from 30 January to 10 February 2006, as part of the planned mission programme of the Food and Veterinary Office (FVO). The mission team comprised four FVO inspectors and was accompanied during the whole mission by representatives from the central competent authority (CCA), the Food and Consumer Product Safety Authority (*Voedsel en Waren Autoriteit* –VWA).

The mission itinerary in pursuit of the mission's objectives included the following visits and meetings:

COMPETENT AUTHORITIES			Comments
Competent authorities	Central	4	Opening, 2 intermediate and closing meetings
	Regional	4	East, South, North West and South West regional offices
<b>FOOD PRODUCTION/PROCESSING / DISTRIBUTION (ACTIVITIES)</b>			
Slaughterhouses		5	2 for pigs, 1 cattle, 1 sheep/cattle, 1 sheep/ cattle/ ratites
Cutting plants		8	
Meat products/meat preparations plants/minced meat, MSM		5	
Dairy establishments		5	
Wild game handling establishments		1	
Independent storage establishments (temperature controlled)		3	

At the opening meeting, the objectives, itinerary, and reporting procedures were confirmed, and information complementary to that received in the course of the preparation of the mission was requested by the mission team.

## 2. OBJECTIVES AND SCOPE OF THE MISSION

The objectives of the mission were the evaluation of:

- official controls over food business operators' compliance with general and specific rules on the hygiene of food of animal origin,
- the implementation of these rules by food business operators,
- official controls over animal welfare at the time of slaughter and killing
- follow-up to previous FVO missions on food of animal origin.

In particular, controls over meat, milk and their products in the framework of Regulations (EC) No 178/2002, No 852/2004, No 853/2004, No 854/2004 and No 882/2004<sup>2</sup> were subject to the evaluation.

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<sup>2</sup> References to Community Acts relevant to this mission are listed in the Annex to this report.

### 3. LEGAL BASIS FOR THE MISSION

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

### 4. MAIN FINDINGS

#### 4.1. Competent Authorities

##### 4.1.1. *Designation of competent authorities and operational criteria*

The CCA finished a major reorganisation in December 2005. From 1 January 2006 the VWA is the CCA for the meat and milk sectors and it is responsible for the official controls in the meat sector (it includes the former Inspectorate for Health Protection and Veterinary Public Health (KvW) and the National Inspection Service for livestock and Meat (RVV)). The VWA is an independent agency in the Ministry of Agriculture, Nature and Food Quality (LNV) and a delivery agency for the Ministry of Health, Welfare and Sport (VWS). The three main tasks of the VWA are supervision, risk assessment and risk communication. Incident and crisis management and policy advice for the LNV are also part of its activities.

For the control of establishments in the meat sector, the country is divided into five regions, each with a regional office. For the audit and inspection activities, the regions have established several working teams.

The Central Body for Dairy Quality (*Centraal Orgaan voor Kwaliteitsaangelegenheden in de Zuivel* - COKZ) is an independent quality control institute which acts as competent authority (CA) for the dairy sector under the responsibility of the VWA. In the period up to 1 January 2011, the extent to which the public tasks of the COKZ can be integrated into the VWA will be examined.. COKZ is accredited in accordance with EN 45004.

##### 4.1.1.1. Co-ordination of competent authorities

The legal relationship between the VWA and COKZ is laid down in Dutch legislation, which establishes that the VWA has to approve the annual programme of COKZ and that it will receive all inspection reports from COKZ. Their coordination has been formally established at different levels and there are procedures in place to coordinate activities when the VWA and COKZ are involved (i.e. alerts, complaints).

#### Observations

- The coordination was found to be satisfactory for activities covered by the scope of the mission, but not in respect of the control of animal by products (ABP) (i.e. in dairy establishments visited, COKZ performed one inspection related to ABP at the request of the VWA, but there was no follow up of the

deficiencies observed. COKZ does not check ABP related issues during regular visits)<sup>3</sup>.

- The responsibilities were clearly defined with no gaps or overlapping between the VWA and COKZ.
- Lack of coordination and communication was observed between different units of the VWA at different levels (i.e. a cold store was officially visited for different purposes and the officials did not receive the relevant information from previous visits from another department; the official approvals of establishments were different on different official databases; at regional level, lack of procedures to coordinate departments controlling primary production and animal products).

#### 4.1.1.2. Legal powers

The VWA has been authorised to grant approvals to the establishments by national law (*Regeling mandaat IG-VWA inzake het verlenen van bepaalde erkenningen* of 12 December 2005). COKZ received authorisation on 13 January 2006 from the VWA to approve dairy establishments (*Verlening VWA-ondermandaat aan COKZ en CPE*).

By Amendment Commodity Act Orders Food Hygiene, 12 December 2005<sup>4</sup> the VWA has now the capacity to impose administrative sanctions on establishments under the responsibility of the VWS, but not on those under the responsibility of the LNV (slaughterhouses (SHs) and cutting plants).

The withdrawal of approval has to be done by the VWA.

#### Observations

- The VWA and COKZ have legal powers to carry out controls and to order corrective measures in case of non compliance.
- To impose administrative sanctions in the dairy sector, COKZ has to refer to the VWA. No fines have yet been imposed for dairies.
- For suspension of activities or withdrawal of approval, the legal proceedings go via the General Inspectorate of the VWA.

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<sup>3</sup> *In their response to the draft report the Dutch authorities noted that since 1 January 2005, the COKZ was appointed as "unpaid official" of the VWA to carry out controls on source establishments under Regulation (EC) 1774/2002, and that they have carried out controls since April 2005. The COKZ is not competent to impose penalties under the ABP Regulation. This problem was resolved by allowing the COKZ employees to cooperate with the VWA officials, who are competent. In the near future, the possibility will be created for the COKZ to draw up a report itself and send it to the VWA including a sanction. The VWA will carry out an audit on the COKZ next year on implementation of the controls in accordance with 1774/2002.*

<sup>4</sup> *"Besluit van 12 december 2005, houdende wijziging van het Warenwetbesluit bestuurlijke boeten in verband met nieuwe hygiëneregels voor levensmiddelen, van het Warenwetbesluit Vlees, gehakt en vleesproducten inzake het federgetal en gepaneerde waren, en van het Warenwetbesluit hygiëne van levensmiddelen."*

#### 4.1.1.3. Audits of CA

The internal audit department was set up in September 2005. There are between 11 and 12 staff members available from different sources for auditing tasks and an audit programme for 2006/2007 has been set up.

The responsibilities of the external audit department of VWA include audits of COKZ. These audits are planned for 2006 but no detailed planning for them has yet taken place.

The CCA stated that there were audits of the COKZ by the Ministry of Agriculture in previous years (in 2001 and 2005), and that close attention was paid to COKZ's independence. At the request of the Ministry, the administrative and financial processes of the different services of the COKZ have been completely separated. With regard to its independence, the Ministry also accepted the statements made by the accreditation board when COKZ was certified according to EN 45004.

#### 4.1.1.4. Other criteria

##### Observations

- COKZ performs official and private activities in the dairy sector, with the same personnel (i.e. process and HACCP certification, laboratory services).
- Some shortages in number and in expertise of staff, considering the activities planned for 2006, were reported to the mission team by some VWA teams in the regions visited.
- It was observed that cold stores in the meat sector were not visited if there was a shortage of staff and, when visited, the allocation of different staff for each visit, the lack of a system to ensure good communication amongst them and the short visits scheduled hindered the official control.

#### 4.1.2. *Delegation of specific tasks related to official controls*

From 1 January 2006, the post-mortem inspection activities in SHs have been delegated to the Animal Sector Quality Inspection Foundation (B.V. *Kwaliteitskeuring Dierlijke Sector*- KDS) under the supervision of the OV of the VWA.<sup>5</sup>

##### 4.1.2.1. Conditions for delegation

##### Observations

- The delegated tasks are clearly described in the contract signed between the VWA and KDS on 25 November 2005. A quality manual has been developed by KDS and has been approved by the VWA.

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<sup>5</sup> *In their response to the draft report the Dutch authorities noted their disagreement with the FVO's assumption that KDS is a control body as defined in Regulation (EC) No. 882/2004, article 5. Please see addendum for further details.*



- KDS does not have a sufficient number of suitably qualified and experienced staff (some meat inspectors from the VWA were still performing post-mortem inspections) and KDS is not accredited in accordance with EN 45004. Both are requirements of Regulation (EC) No 882/2004, Article 5 and accreditation is listed as requirement in the contract with the VWA. It is expected that by May 2006 all the personnel performing post-mortem inspections will be from KDS.
- The delegation of specific control tasks from the VWA to KDS has not been notified to the Commission contrary to the requirements of Regulation (EC) No 882/2004, Article 5 (4).

#### 4.1.2.2. Co-ordination with the competent authority

According to the contract between KDS and the VWA, the auxiliaries have to complete a form and send it to the official veterinarian (OV) after the inspection. In case of problems, they should contact the OV immediately. KDS will report quarterly to VWA on the progress of the post-mortem inspection activities.

#### Observations

- Meetings between KDS staff and the OV in charge of the slaughterhouse (SH) were scheduled monthly in addition to daily inspections by the OV in large scale SHs.
- There was no national system to communicate the results of post-mortem inspection from the official auxiliary to the OV (when he is not permanently present) and to call him when suspect meat is put apart. When the officials were questioned about this issue they explained that no arrangements were yet in place.<sup>6</sup>

#### 4.1.2.3. Audits and inspections by the competent authority

An external audit unit was established in the VWA on 1 January 2006. It will audit KDS and COKZ, but the programme has not yet been developed.

#### Observations

- There are two procedures for the supervision of KDS personnel by the OV, one to be used in SHs with the permanent presence of the OV and the other for those without the permanent presence of the OV. Evidence of the first was seen in two SHs and the procedure was followed properly.

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<sup>6</sup> *In their response to the draft report the Dutch authorities noted that for organisation and communication regarding inspections at slaughterhouses, where there is no permanent supervision by the OV, the so-called "Combiformulier" has been developed. It contains forms to report to the OV the results of post-mortem inspection. A new (draft) version 2.0 of the "Combiformulier" (to be introduced in June/July 2006) contains instructions on how the official auxiliary is to hand over the post-mortem inspection to the OV, via the Planning Department.*

#### *4.1.3. Staff performing official controls*

The CCA has developed a training programme for VWA officials including information on the new legislation, the new projects for official controls and taking into account the requirements in Annex II of Regulation (EC) No 882/2004. There is a database in place (EduManager) that contains the training followed by each official and its date.

The CCA has placed legislation, information, instructions and procedures on the Intranet and Internet and encourages the staff to consult it and to use it as reference material.

COKZ and KDS are responsible for training their own personnel. COKZ has published its procedures on the Internet.

#### Observations

- Examples of records of seminars and workshops carried out and the staff who attended them were seen.
- All the VWA officials met in the field (meat sector) had knowledge about the changes in the official controls for 2006, but the level of knowledge of the specific instructions and procedures was very variable (see points 4.1.5.2 and 4.1.5.3).
- The team leaders held regular meetings at regional level. The training of personnel and needs for specific expertise were discussed, as observed from the minutes.
- COKZ developed and carried out training for personnel performing official controls in dairy plants. The staff met during the visits had a good knowledge of the procedures.

#### *4.1.4. General obligations with regard to the organisation of official controls*

The official control for meat establishments is organised into national projects. The structural and hygiene conditions of establishments will be assessed at least once a year, and the CA will categorise the establishments into three groups according to their level of compliance. The frequency of re-assessment will depend on the category assigned, the production volume and type of establishment.

The HACCP-based systems of self-checks used by the establishments will be audited and verified. The frequency may vary with the type of establishment and the non-compliances found, but minimum frequencies have been established.

For post mortem inspection, the frequency of supervision by the OV has been set based on the speed of the slaughter line, the number of animals slaughtered weekly and the species.

In the dairy sector, COKZ has set a clear procedure establishing the frequency of controls (one complete audit every three years and partial audits yearly) and the criteria for increasing it.

#### 4.1.4.1. Organisation of official controls

##### Observations

- Several factors have been taken into account to set the system of official controls. Those include the reliability of the own checks in the dairy sector, but not in the meat sector contrary to the requirements of Article 3, 1 (c) of Regulation (EC) No. 882/2004.

#### 4.1.4.2. Periodicity and frequency of the official controls

##### Observations

- Some establishments visited that were classified as “good” had significant hygiene or structural deficiencies (i.e. cutting plant with bad maintenance and problems of condensation, meat product establishment with crossing of flows resulting in a potential risk of contamination)<sup>7</sup>.
- The establishments received one classification, even if they perform several activities, and the average value to classify them did not always reflect the reality (i.e. one SH with cutting plant was classified as “good” although serious problems were identified in the cutting area).
- For dairy establishments, the controls were performed regularly and with adequate frequency.
- For SHs, ante-mortem inspection was carried out by an OV and post-mortem inspection by VWA auxiliaries and KDS staff. Prior to 1 January 2006 the OV was permanently present in all SHs during post-mortem. Since that date, the regime of supervision varies from the permanent presence of the OV in some establishments to once a month in others.
- The regions have the capacity to adapt the national projects. Some teams adapt the frequencies of official controls to their team’s circumstances (i.e. staff, expertise). In one region, they were developing a risk based system (based on five criteria) to prioritize; in others the criteria were not fixed.

#### 4.1.4.3. Procedure to review the system

##### Observations

- A first evaluation of the project linked to the categorisation of meat establishment (structural and hygiene requirements) is scheduled for May 2006.
- A database (ISI) has been developed to enter the results of all official controls. It is foreseen that each project will be evaluated once a year by the project coordinator based on the analysis of data registered.
- In the dairy sector, the results (reports) of all the controls performed are reviewed by other officials who also assess the practical work of the inspectors by monitoring and internal audits.

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<sup>7</sup> *In their response to the draft report the Dutch authorities noted that the classifications are based on building requirements and not HACCP. Although there were shortcomings in the establishments, the VWA had already launched a procedure to rectify them at the time of the mission*

#### 4.1.4.4. Transparency and confidentiality

The CCA informed the mission team that the VWA and COKZ have a policy seeking transparency. An annual report is published by both institutions and information is available on the Internet.

There is a system in place to deal with alerts which affect the meat and dairy sectors, and it covers the whole food chain. A department of the VWA is in charge of incidents and crisis, and it also coordinates the activities when COKZ has to be involved. The communication departments of the Ministries are involved when the public need to be informed via the mass media.

#### Observations

- Information for the public concerning food safety issues is published on the VWA's webpage.
- The system to deal with alerts was found to be effective in a recent case on dioxins: the necessary information on the farms affected was available in a short time for the OV performing ante-mortem inspection at the SH. General information was also published on the official website and constantly updated.

#### 4.1.5. *Control and verification procedures*

##### 4.1.5.1. Procedures on tasks, responsibilities and duties of staff

#### Observations

- For the VWA, the tasks and responsibilities attached to the different professional levels, as well as the necessary education and skills, are clearly described in a staffing policy document.

##### 4.1.5.2. Procedures on control methods and techniques

Different methods of official controls are described in the procedures and instructions (i.e. sampling, inspection, verification, audit). Guidelines and instructions have been developed for the officials to interpret the results of the official controls carried out and the results of the controls performed by the food business operators.

#### Observations

- Evidence of official sampling, verification and inspections was seen during the visits to the establishments.
- The audits of the HACCP-based systems have not started yet in meat establishments; they are scheduled to begin after the assessment of the structural and hygiene conditions.
- Some of the officials met did not know the instructions to evaluate and interpret the results of the food business operator's controls.

- The national instruction to perform *Trichinella* investigation in meat was issued in 2002 and it describes a method that is not one of those laid down in Regulation (EC) No 2075/2005.

#### 4.1.5.3. Actions following official controls

##### Observations

- Officials have received instructions to enter the results of official controls in the ISI database. However, the database was not yet available for all the regions visited and the officials met.
- Actions to be taken in case of non-compliance (i.e. verbal and written warnings, cease production) are included in different instructions and procedures, but the officials met did not know the procedure for imposing administrative sanctions.

#### 4.1.5.4. Verification procedures

##### Observations

- The verification procedures for the official control system were not yet in place since the system was in the first stage of implementation.
- For controls performed by the VWA, the CA stated that each project has a coordinator responsible for modifying, when needed, the instructions and checklists placed on the Intranet. The officials should take the checklists and instructions directly from the Intranet, which ensures that all staff use the last version of the documents. However, the system was not ready in many of the areas visited, and old and new paper checklists were in use.
- For controls performed by COKZ, each official received a folder with all the instructions and procedures, which are also placed on the Internet. When the documents are updated, the new set is individually distributed. All officials met had an updated folder with the instructions and procedures in place.

#### 4.1.6. *Reports*

##### Observations

- Official reports were drawn up after official controls and a copy was given to the food business operator.
- The content of the reports was in line with Article 9 of Regulation (EC) No 882/2004, including actions to be taken by the food business operator in case of non-compliance.
- No time limit was set for reporting after the official controls, and delays longer than a week were observed in the meat sector. The ISI database where reports are to be included was not available to most of the officials met.

## **4.2. Official certification**

The distribution and control of blank, cancelled and issued certificates is carried out at regional offices using a computerized system (ROFOS).

Each certifying officer has a unique number that is indicated on his or her official stamp.

For dairy products, the products to be exported are usually not inspected. The CA stated that the certification was based on “system certification” and not consignment by consignment. There is a team of VWA veterinarians responsible for issuing veterinary certificates and COKZ supervises the exporting companies and relies on the operators for the information supplied for the certificate. COKZ verifies some certificates issued at the request of the OV and if problems are detected, the next five consignments from that company are individually inspected.

#### Observations

- The system to control the certificates was found to be effective and as described by the CA.
- For the meat sector, in the cases seen, the products were inspected before their certification. There was a link between the certificate and the consignment (i.e. official seal number, batch number) in the cases seen.
- For dairy products, the system was as described by the CA: the operator supplied the information, the products exported were not inspected and COKZ verified different issues (i.e. traceability, companies’ statements of origin of milk). The link between the certificate and the consignment is usually the batch number.
- Verification of certificates issued for dairy products was seen. For one receiving country, 65 out of 1456 certificates were verified.

### **4.3. Registration and approval of establishments**

Instructions and information to register food establishments are available on the CCA’s webpage and the operators can register on-line.

There were instructions to inform the officials about the registration and approval procedures. It is expected to approve, according to Regulation (EC) No 853/2004, all establishments that were approved or authorised under the previous legislation by December 2006.

#### *4.3.1. Registration of establishments*

Existing databases from other organisations and administrations (i.e. municipalities, ministries, branches of industry) have been used to register food establishments.

#### Observations

- Registration of establishments was still proceeding in the meat sector.
- According to COKZ, the registration process is complete for dry storage areas. During 2006 the current approvals of small scale on farm producers with direct sale will be converted to registrations. Supervision of registered food business operators (type and frequency) will be similar to the supervision of approved establishments.

#### 4.3.2. *Approval of establishments*

There are new checklists for the approval of meat establishments which include structural and hygiene requirements. The list of establishments available during the mission was the one based on previous legislation and regionalization. The new list will also be placed on the Internet.

##### Observations

- The CA had scheduled a date for the approval inspection for most of the establishments visited, but very few establishments had already been assessed.
- There were different computerised systems for the officials to verify the current approvals of establishments, but the information contained in them was not always the same, (e.g.: during the visit to one cold store it was not clear which of the approvals were still valid and which were previously revoked).
- Some establishments visited carried out activities without the necessary approvals (i.e. production of minced meat or meat products, handling and packing of grated cheese)<sup>8</sup>. Some approvals were in place for establishments not fulfilling the requirements (i.e. two cold stores approved as cutting plants without having the necessary equipment and conditions).
- When questioned about the new procedure for approvals, some officials were considering to approve the establishments basing their assessment on the activities already approved (under the old legislation), however, not taking into consideration some changes (e.g. that some meat products establishment will need only registration under the new legislation) and not taking into account activities performed and not approved.

#### 4.3.3. *National measures and derogations*

National rules for sale of raw milk have been established, as foreseen in Article 10(8) of Regulation (EC) No 853/2004. The CCA informed the mission team that no other national measures or derogations were foreseen.

#### **4.4. Application of Hygiene Rules at establishment level and official controls**

##### *4.4.1. Food business operators' obligations*

##### *4.4.1.1. General hygiene requirements*

##### Observations

- In the majority of establishments visited, the general hygiene requirements were in line with Article 4 and Annex II of Regulation (EC) No 852/2004.
- One dairy establishment visited performed a non-approved activity in a non-approved premises. The hygiene conditions were very poor.

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<sup>8</sup> *In their response to the draft report the Dutch authorities noted that immediate action was taken on this point. The establishment grating cheese stopped this activity and the FVO team was informed during the mission.*

- Deficiencies were observed in the layout of three establishments, leading to cross flows between raw and processed products. Some other establishments presented crossing of lines due to over capacity production (i.e. insufficient capacity to cool processed products that were deviated to the raw product area) or to the enlarging of activities (i.e. establishments requested approval as cold stores after being approved for other activities and the flows were not sufficiently considered).

#### 4.4.1.2. Specific requirements

##### Observations

- In one SH visited, there was no clear separation between the lairage and the adjacent holding (i.e. presence of bedding for sheep and farm machinery).
- Cutting rooms did not always have equipment for washing hands with taps designed to prevent the spread of contamination. One dairy plant had no facilities for washing hands in the area of brining, wrapping and packing.
- Problems of hygiene of operations were detected in a cutting plant (faecal contamination and the presence of straw and hair on carcasses, carcasses touching the wall) and in two SH (the method of skinning allowing contact between the outside of the hide/fleece with the carcase, carcasses touching the floor).

#### 4.4.1.3. HACCP based systems

##### Observations

- All establishments visited, except one cutting plant, had a HACCP-based system in place.
- Some non-conformities were observed: procedures documented in the HACCP manual were not correctly followed (e.g. trimming of carcasses if faecal contamination was present), the flow diagrams were not accurate (e.g. freezing of meat before going to the cutting plant was not included; in one SH, the flows were so general in the manual that actual crossings did not appear, etc), effectiveness of some procedures were not validated or documented (e.g. cleaning of tools), some critical control points established were not such (according to the definition of the Codex Alimentarius) and critical limits were not always set for critical control points.
- In one establishment, the training programme consisted only in two hours training on general hygiene and it did not include the HACCP procedures.
- Microbiological testing of products did not always comply with Regulation (EC) No 2073/2005 (e.g. in frequency and criteria). In some cases, there was no clear link between the samples and the products, in others there was a lack of evaluation and proper follow up of the results (e.g. in one establishment, the results of analyses of minced meat batches were constantly over the limit and no corrective measures were taken).
- In one establishment, mechanically separated meat (MSM) was used in meat preparations without demonstrating its compliance with the microbiological criteria for minced meat, as required in Regulation (EC) No 853/2004, Annex III, section V, chapter II, 2.
- Sampling of equipment was sometimes not risk based and in one establishment samples were taken mainly from non-production parts of the plant.



#### 4.4.1.4. Identification marking

##### Observations

- Most of the products of animal origin bore an identification mark.
- Frequently, crates containing pieces of meat (sometimes individually packed) are labelled with a single identification mark. In several cases, old labels with different identification marks were still affixed to the crates.
- In one cold store, the identification mark applied to products (e.g. animal fat) did not have documentary support that it was suitable for human consumption.
- One establishment was using both the round mark and the oval one for its products without any supporting reason.

#### 4.4.1.5. Traceability and labelling

##### Observations

- In general, the operators complied with Regulation (EC) No 178/2002, Article 18, regarding traceability. The establishments also had systems for internal traceability and in general, they were found to be reliable.
- Small amounts of non traceable products were seen in some establishments (e.g. crates of meat in a cutting plant).
- In general, labelling was correct. In one cutting plant, the labelling of beef was incomplete: the number and country of the slaughterhouse and previous cutting plant did not appear on the label.

#### 4.4.2. *Official controls at establishments for verification of food business operators' compliance*

##### 4.4.2.1. Audits of good hygiene practices

For the meat and dairy sectors, new checklists had been in use since January 2006, but most establishments had not been assessed yet using them. However, good hygiene practices were controlled regularly, based on old legislation, and the following was observed:

##### Observations

- In a dairy plant, serious problem were found in the layout that had not been pointed out during official visits. In other establishments, some layout related problems were detected by the officials, but were not always corrected.
- Operational hygiene: the problems seen were usually detected during official controls, but in many cases the enforcement was poor (deadlines to correct deficiencies were constantly moved forward).
- The official controls on the quality of the water and temperature requirements were found to be satisfactory in both the meat and milk sector.
- In meat establishments, some shortcomings related to the goods entering and exiting establishments (e.g. lack of identification or documentation): in some cases they were not detected by the officials and in others there was no enforcement action.

#### 4.4.2.2. Audits of HACCP-based procedures

##### Observations

- Audits of HACCP-based systems have not been performed before and they will be part of the new system of official controls. In the meat sector, none had been performed yet.
- In some meat establishments, there was no evidence that the results of microbiological analyses done by the operator were checked and assessed.
- In some cutting plants, alternative systems to hot water at 82° C were in use to sterilise knives and tools (e.g. mechanical washing during breaks) and accepted by the CA without assessing their efficacy.
- The audits had started in the dairy sector.

#### 4.4.2.3. Controls over the application of identification mark

##### Observations

- In one meat establishment using round and oval identification marks for products the official records did not point it out. The CA stated that it is not possible for one establishment to use both the round and oval health mark.
- In some meat establishments, the official records did not include any remark when products arriving or stored without an identification mark were seen.

#### 4.4.2.4. Verification of traceability requirements

Traceability has been included as a specific issue in the new checklist for the meat sector. Before, the traceability was controlled mainly for beef labelling.

##### Observations

- No problems were detected in the official control on traceability and labelling of beef.
- In one cold store, an inspection on traceability was performed one week before the mission and the report showed that no problems were found. The mission team visited the same cold store and found that the documentation kept by the company was not sufficient to ensure the traceability of crates with poultry meat without identification marking.
- In some meat establishments visited, there was no evidence of official controls on traceability.

#### 4.4.3. *Official inspection tasks in establishments*

##### 4.4.3.1. *Ante-mortem* inspection

##### Observations

- In the SHs visited, the ante-mortem inspection was always carried out by an OV and no problems were detected. The movement documents and the records kept were found to be adequate.

#### 4.4.3.2. *Post-mortem* inspection

##### Observations

- *Post mortem* inspection was performed by personnel from KDS and VWA.
- The mesenteric and gastric lymph nodes were not palpated in any of the SHs visited contrary to the requirements of Regulation (EC) No 854/2004, Annex I, section IV, Chapter I, A(6). The CCA stated that this had been notified to the Commission by letter in 2000. The mission team reviewed the letter and considered that it was a request to change previous legislation with regard to this issue, but has no influence on the significance of the finding.
- The instructions issued for post-mortem indicate that palpation of mesenteric and gastric lymph nodes are to be performed only in establishments exporting to USA.
- In some SHs, some of the meat (i.e. tongue, carcass) was only quickly looked at as it passed and not properly inspected visually. In one pig SH, the spleen was not inspected and submaxillary lymph nodes were not incised, contrary to the requirements of Regulation (EC) No 854/2004, Annex I, section IV, chapters I and IV.
- Not all of the meat from the animal was put aside for veterinary inspection when abnormalities on the meat were detected by the auxiliaries (only the carcass, not the offal and blood) contrary to the requirements of Regulation (EC) No 854/2004, Annex I, section III, chapter II, 2 (b). In some cases, the auxiliaries condemned and disposed of carcasses without further veterinary inspection.
- In some SHs, there were no official records for post-mortem results contrary to the requirements of Regulation (EC) No 854/2004, Annex I, section II, chapter I, 1.
- The relevant post-mortem results were not always communicated to the operator and veterinarian of the holding of provenance contrary to the requirements of Regulation (EC) No 854/2004, Annex I, section II, chapter I, 2 (b). There was no harmonised system in place to transmit this information.
- In one pig slaughterhouse, a pilot project was in place for post-mortem visual inspection and the food chain information was received by Internet.
- *Trichinella* investigation in meat was carried out according to a national instruction, which differs in the sampling, technique and magnification from the methods described in Regulation (EC) No 2075/2005. The number of samples indicated in the one laboratory's protocol did not match the number of samples sent from the SH.

#### 4.4.3.3. Health marking

##### Observations

- In all the SHs visited, the application of the health mark to carcasses and the official control over it was found to be adequate.
- The mark used for animals which underwent emergency slaughter was different from the oval one (round shape) as required by Regulation (EC) No 854/2004, Annex I, section I, chapter III, 7.

#### 4.4.3.4. Animal welfare at the time of slaughter or killing

According to the checklist, animal welfare (including stunning) is a task to be controlled by the OV performing the ante-mortem inspection.

##### Observations

- In general, the OV performing ante-mortem is not present during the whole slaughter shift. In two SHs, the records related to stunning were not completed and some problems were not detected. Evidence of control of animal welfare during transport/ante-mortem was seen in one SH: a report was sent to the AID (General Inspection Service) to inform them of the findings.
- In two SHs (one for cattle, one for pigs) visited, the company controls and procedures related to animal welfare were very good, but there was no evidence of any official supervision over animal welfare requirements.
- In one sheep SH, the stunning equipment was not connected to a device indicating the voltage and current and also the alarm light of the equipment was not visible for the operator. In one pig SH, there was no alarm to detect low concentration of CO<sub>2</sub> in the stunning chamber.
- In two SHs (one for pigs, one for sheep) the stunning was not efficient and the loss of consciousness did not last until death. In the pig SH, the electrical back-up equipment was not used although stunning by gas was not effective.
- In a cattle and sheep SH, there was no suitable back-up stunning equipment ready to use at the place of slaughter.

#### 4.4.3.5. Health requirements and criteria for raw milk

##### Observations

- The mission team requested information on the official controls to verify the health requirements for raw milk, in particular the health status of the animals, as required by Annex IV of Regulation (EC) No 854/2004, but this was not provided during the mission.
- A clear procedure was in place in the VWA to notify COKZ about suspicions of tuberculosis and brucellosis on dairy farms. In the COKZ a protocol is followed to order heat treatment of the milk of the affected dairy farm and controls on the implementation of this order are carried out by COKZ. There had been about 50 suspicions of brucellosis annually which, in recent years, all were proved negative.
- Official controls to verify specifically the hygiene of milk production holdings were not yet in place. It is foreseen that the dairy industry will set up quality assurance systems for the holdings and control these systems, and that those controls would be verified by COKZ starting this year (supervision of 300 holdings is planned).
- The dairy industry implements the checks on the raw milk criteria (plate count, somatic cell count and antibiotic residues) of cow milk. Results exceeding limits are notified to COKZ who supervise the prohibition of milk collection. The checks on raw milk criteria for sheep and goat milk are directly implemented by COKZ. For the 30 horse milk farms in the Netherlands, the sector is currently setting up the system.

#### 4.4.3.6. Professional qualifications of official veterinarians and auxiliaries

The training programme developed by the VWA takes into account the requirements in Regulation (EC) No 854/2004, Annex I, section III, chapter IV, A, for OV's working with fresh meat.

The different needs of newcomers, OV's already in the service and practitioners working part-time for the VWA have been addressed.

KDS has developed a training programme for the auxiliaries performing post-mortem inspections and it foresees that all the personnel will be trained by May 2006.

#### Observations

- The training programme of VWA includes theoretical and practical parts, but it is still in its first stages of implementation; the majority of the activities planned will take place during 2006.
- According to the documentation received, the auxiliaries (KDS staff) will receive 400 hours of theory and 240 hours of practice (for pigs and beef) which is not in line with Regulation (EC) No 854/2004, Annex I, Section III, Chapter IV, B2. Although it was requested, the information on the subjects covered and the test carried out could not be provided during the mission.

#### 4.4.4. *Action in case of non-compliance*

#### Observations

- Examples of actions taken in cases of non-compliance were seen (e.g. increase in the frequency of inspection, requests for action plans from the operator, deadlines to correct the shortcomings and a letter starting a procedure to withdraw the approval).
- However, in some establishments, there was evidence of poor enforcement (e.g. deficiencies lasting for long periods, deadlines that were moved forward).
- Summary information was received on the fines imposed on food establishments until December 2005.

#### **4.5. Follow-up of previous FVO missions**

There were no outstanding issues for the Netherlands within the scope of the mission.

#### **4.6. Miscellaneous**

- In one SH, medicines were stored on the premises. The operator of the SH was rearing animals, but no records were kept, contrary to the requirements of Regulation (EC) No 852/2004, Annex I, part A, III.
- Several problems were detected relating to animal by-products (ABP). In one SH, category 1 material was stored uncovered outside and wild birds had access to it. There was also category 1 material temporarily stored in the corridor leading to the cutting plant. Lack of transport documents and lack of identification of containers were seen in several establishments.

## 5. CLOSING MEETING

A closing meeting was held on 10 February 2006 with the representatives of the CCA, during which the mission team presented its initial findings. The CCA expressed its will to correct the shortcomings observed provided its initial comments.

## 6. CONCLUSIONS

### 6.1. Competent Authorities

- Competent Authorities are clearly designated for all areas and the coordination between the VWA and COKZ is effective. However, the lack of good internal coordination between the different departments of the VWA, contrary to the requirements of Regulation (EC) No 882/2004, Article 4, (5) could weaken the system of official controls in the meat sector.
- The fact that COKZ's staff perform private and official activities in the dairy sector may present a conflict of interests contrary to the requirements of Regulation (EC) No 882/2004, Article 4, (2)b. The fact that audits of COKZ by the CCA had not been performed prevent this from being ruled out..
- The lack of accreditation and of sufficient qualified staff of KDS is not in line with Article 5, (2)c, of Regulation (EC) No 882/2004. Moreover, KDS has not been audited by the CCA which limits the capacity to ensure competence, consistency and impartiality. The Netherlands has not notified the Commission about its wish to delegate official tasks to KDS contrary to the requirements of Regulation (EC) No 882/2004, Article 5, (4)<sup>9</sup>.
- The design of the system of official controls is, in general, in line with EU requirements. The reliability of the operator's checks has not been considered when organising the controls. However, the system is in a very early stage of implementation, which limits the degree to which a full assessment can be made of its efficacy and of the appropriateness of the frequencies set. The fact that some procedures, resources and instructions are not updated or available to all officials leads to a lack of uniformity in the control approach and reduces the effectiveness of the system.

### 6.2. Official certification

Official certification in the meat sector was in line with EU requirements. In the dairy sector, the lack of inspection of all the consignments be exported

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<sup>9</sup> *In their response to the draft report the Dutch authorities noted that the KDS was very short of staff. Supplementary training was needed, and this meant that some of the staff already present were not available. This temporary shortage was offset by the VWA official auxiliaries. The KDS has now also recruited new personnel. There has always been a sufficient number of qualified staff in the establishments. See also footnote 5*

compromises the assurance that the data in the certificate are accurate and authentic as required by Regulation (EC) No 882/2004, Article 30, (2).

### **6.3. Registration and approval of establishments**

- The general system for registration and approval of establishments is in line with the requirements of Regulations (EC) No 852/2004, Article 6, No 854/2004, Article 3 and No 882/2004, Article 31. However, the lack of awareness in the field on how to assess the establishments for approval leads to a risk of maintaining the inaccuracies observed regarding the activities authorised.

### **6.4. Application of Hygiene Rules at establishment level and official controls**

- The food business operators comply, in general, with the obligations laid down in Regulation (EC) No 853/2004, Chapter II. However, in a few establishments visited, the poor hygiene of operations, the inadequate application of the HACCP-based procedures and inadequate layout may compromise the hygienic production of food.
- The official controls are performed effectively for water quality, temperature requirements, application of health marks and ante-mortem inspection. However, the lack of assessment of HACCP-based systems and their associated controls and the poor control of traceability at this stage, contrary to the requirements of Regulations (EC) No 882/2004, Article 10, and No 854/2004, Article 4, together with the weak enforcement in some cases, compromise the efficacy of the system.
- The instructions on post-mortem inspections regarding palpation of some lymph nodes and its practical performance are not in line with the requirements of Regulation (EC) No 854/2004, Annex I, section IV, chapters I, II and IV.
- *Trichinella* investigation in meat and official controls on animal welfare are not in line with EU requirements of Regulations (EC) No 2075/2005 and 854/2004, Article 5 (1), respectively.
- The official controls in dairy establishments are in line with EU requirements, but specific official controls on the hygiene of milk producing holdings, as required by Regulation (EC) No 854/2004, Annex IV, chapter I, 3. are not yet in place. The information received on the official controls to verify the health requirements for raw milk, in particular the health status of the animals (as required in Regulation (EC) No 854/2004, Annex IV, chapter I, 1.) is not sufficient to evaluate them.
- The training programme for VWA staff is in line with the requirements of Regulation (EC) No 882/2004, Article 6 and with Regulation (EC) No 854/2004, Annex I, section III, chapter IV, A. for professional qualifications for OV working with fresh meat.

- The training of KDS auxiliaries is not in line with the requirements of Regulation (EC) No 854/2004, Annex I, section III, chapter IV, B .

#### **6.5. Follow-up of previous FVO missions**

There were no outstanding issues for the Netherlands within the scope of the mission.

#### **6.6. Miscellaneous**

- Regarding ABP, the lack of identification of containers, the incorrect storage and the lack of transport documents indicate non-compliance with Regulation (EC) No 1774/2002. In the dairy sector, the lack of proper coordination between the VWA and COKZ lead to inadequate control and follow up.

### **7. RECOMMENDATIONS TO THE COMPETENT AUTHORITY OF THE NETHERLANDS**

The competent authorities are invited to provide, within 25 working days of receipt of the draft report, an action plan containing details of the actions taken and planned, including deadlines for their completion, to address the following recommendations:

- (1) To put in place appropriate coordination and cooperation procedures between the different units of the VWA responsible for carrying out official controls, and to implement them effectively as required by Regulation (EC) No 882/2004, Article 4, (5).
- (2) To implement audits as required by Article 4 (6) of Regulation (EC) No 882/2004 and to audit COKZ, paying special attention to its impartiality.
- (3) To ensure that KDS fulfils all requirements to act as a control body according to Regulation (EC) No 882/2004, Article 5 before delegating specific tasks related to official controls. To audit KDS regularly and to notify the Commission services of the organisation and the task delegated to it.
- (4) To assess the reliability of own checks and to take them into account when organising the official controls, as required by article 3 of Regulation (EC) No 882/2004.
- (5) To complete the implementation of the official control system: to train and inform the staff performing official controls and ensure that all the instructions, procedures and resources are available and followed.
- (6) To implement a system to verify the effectiveness of official controls carried out by the VWA and COKZ as required by article 8 (3) of Regulation (EC) No 882/2004.



- (7) To establish procedures to inspect products of animal origin that need to be certified to ensure that the information in the certificate is accurate and authentic as required by Regulation (EC) No 882/2004, Article 30, (2).
- (8) To audit the HACCP-based systems, to assess the results of the own checks and verify compliance with the rules and criteria laid down in Regulation (EC) No 2073/2005, regarding microbiological criteria, to determine the actions that the food business operator should take.
- (9) To correct the instructions on post-mortem inspection and bring the post-mortem inspection in line with the requirements of Annex I of Regulation (EC) No 854/2004, and to update the instruction for performing *Trichinella* testing to ensure that the method carried out is in line with Regulation (EC) No 2075/2005.
- (10) To put in place procedures and instructions to ensure that compliance with animal welfare requirements is regularly assessed in the slaughterhouses as required by Regulation (EC) No 854/2004, Article 5 (c), and that stunning equipment is in line with EU requirements, and to implement them effectively.
- (11) To implement official controls on the hygiene of milk producing holdings as required by Regulation (EC) No 854/2004, Annex IV, chapter I, (3).
- (12) To ensure that auxiliaries appointed to work with fresh meat have the professional qualifications required by Regulation (EC) No 854/2004, Annex I, section III, chapter IV.
- (13) To take the necessary measures to bring the control, collection, identification and transport (including the keeping of required records and documents) of ABP in line with Regulation (EC) No 1774/2002 and to put in place appropriate coordination procedures between VWA and COKZ to ensure that official controls on ABP in the dairy sector are carried out.

## **8. ADDENDUM**

The Dutch Authorities commented on the draft report by a letter dated 18 April 2006. They noted their disagreement with the FVO's assessment that KDS is a control body as defined in Regulation (EC) No 882/2004, article 5. The Dutch Authorities stated that KDS has no control over the way in which its employees and contracted workers carry out their work as official auxiliaries. This control is exclusively in the hands of the VWA. This also means that the VWA does not delegate inspection tasks to KDS. Any "delegation" would involve a situation in which the VWA relinquished authority and first line responsibility to KDS for the execution of the tasks carried out by the official auxiliaries. As in the view of the Dutch Authorities KDS cannot be considered to be a control body, the Commission was not notified of KDS and the tasks delegated to it.

The CA sent further comments to the draft report by a letter dated 29 June 2006. Where appropriate these comments have been incorporated into the final report.

They also provided an action plan in response to the conclusions and recommendations in the report, in particular by providing details of action already taken or to be taken to correct deficiencies noted. The comments and the action plan can be seen as an attachment to this report.

## 9. ANNEX REFERENCES TO COMMUNITY ACTS RELEVANT TO THIS MISSION<sup>10</sup>

European legislation	Official Journal	Title
Council Directive 64/432/EEC	OJ N° L 121, 29.07.1964, p. 1977	Council Directive 64/432/EEC of 26 June 1964 on animal health problems affecting intra-Community trade in bovine animals and swine
Council Directive 89/662/EEC	OJ N° L 395, 30.12.1989, p. 13	Council Directive 89/662/EEC of 11 December 1989 concerning veterinary checks in intra-Community trade with a view to the completion of the internal market
Council Directive 92/102/EEC	OJ N° L 355, 05.12.1992, p. 32	Council Directive 92/102/EEC of 27 November 1992 on the identification and registration of animals
Council Directive 92/118/EEC	OJ N° L 062, 15.03.1993, p. 49	Council Directive 92/118/EEC of 17 December 1992 laying down animal health and public health requirements governing trade in and imports into the Community of products not subject to the said requirements laid down in specific Community rules referred to in Annex A (I) to Directive 89/662/EEC and, as regards pathogens, to Directive 90/425/EEC
Council Directive 93/119/EC	OJ N° L 340, 31.12.1993, p. 21	Council Directive 93/119/EC of 22 December 1993 on the protection of animals at the time of slaughter or killing
Council Directive 96/22/EC	OJ N° L 125, 23.05.1996, p. 3	Council Directive 96/22/EC of 29 April 1996 concerning the prohibition on the use in stockfarming of certain substances having a hormonal or thyrostatic action and of $\beta$ -agonists, and repealing Directives 81/602/EEC, 88/146/EEC and 88/299/EEC
Council Directive 96/23/EC	OJ N° L 125, 23.05.1996, p. 10	Council Directive 96/23/EC of 29 April 1996 on measures to monitor certain substances and residues thereof in live animals and animal products and repealing Directives 85/358/EEC and 86/469/EEC and Decisions 89/187/EEC and 91/664/EEC
Council Directive 96/93/EC	OJ N° L 013, 16.01.1997, p. 28	Council Directive 96/93/EC of 17 December 1996 on the certification of animals and animal products
Council Directive 97/78/EC	OJ N° L 024, 30.01.1998, p. 9	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
Council Directive 98/83/EC	OJ N° L 330, 05.12.1998, p. 32	Council Directive 98/83/EC of 3 November 1998 on the quality of water intended for human consumption

<sup>10</sup> Community acts listed under this section refer to the latest amended version

Council Directive 2002/99/EC	OJ N° L 018, 23.01.2003, p. 11	Council Directive 2002/99/EC of 16 December 2002 laying down the animal health rules governing the production, processing, distribution and introduction of products of animal origin for human consumption
Directive 2000/13/EC of the European Parliament and of the Council	OJ N° L 109, 06.05.2000 p.29	Directive 2000/13/EC of the European Parliament and of the Council of 20 March 2000 on the approximation of the laws of the Member States relating to the labelling, presentation and advertising of foodstuffs
Directive 2004/41/EC of the European Parliament and of the Council	OJ N° L 157, 30.04.2004, p.33 corrected and re-published in OJ N° L 195, 02.06.2004, p. 12	Directive 2004/41/EC of the European Parliament and of the Council of 21 April 2004 repealing certain Directives concerning food hygiene and health conditions for the production and placing on the market of certain products of animal origin intended for human consumption and amending Council Directives 89/662/EEC and 92/118/EEC and Council Decision 95/408/EC
Regulation (EC) No. 1760/2000 of the European Parliament and of the Council	OJ N° L 204, 11.08.2000, p. 1	Regulation (EC) No. 1760/2000 of the European Parliament and of the Council of 17 July 2000 establishing a system for the identification and registration of bovine animals and regarding the labelling of beef and beef products and repealing Council Regulation EC No. 820/97
Commission Regulation (EC) No. 1825/2000	OJ N° L 216, 26.08.2000, p. 8	Commission Regulation (EC) No 1825/2000 of 25 August 2000 laying down detailed rules for the application of Regulation (EC) No 1760/2000 of the European Parliament and of the Council as regards the labelling of beef and beef products
Commission Regulation (EC) No 2073/2005	OJ N° L 338, 22.12.2005, p. 1	Commission Regulation (EC) No 2073/2005 of 15 November 2005 on microbiological criteria for foodstuffs
Commission Regulation (EC) No 2074/2005	OJ N° L 338, 22.12.2005, p. 27	Commission Regulation (EC) No 2074/2005 of 5 December 2005 laying down implementing measures for certain products under Regulation (EC) No 853/2004 of the European Parliament and of the Council and for the organisation of official controls under Regulation (EC) No 854/2004 of the European Parliament and of the Council and Regulation (EC) No 882/2004 of the European Parliament and of the Council, derogating from Regulation (EC) No 852/2004 of the European Parliament and of the Council and amending Regulations (EC) No 853/2004 and (EC) 854/2004
Commission Regulation (EC) No 2075/2005	OJ N° L 338, 22.12.2005, p. 60	Commission Regulation (EC) No 2075/2005 of 5 December 2005 laying down specific rules on official controls for <i>Trichinella</i> in meat
Commission Regulation (EC) No 2076/2005	OJ N° L 338, 22.12.2005, p. 83	Commission Regulation (EC) No 2076/2005 of 5 December 2005 laying down transitional arrangements for the implementation of Regulations (EC) No 853/2004, (EC) No 854/2004 and (EC) No 882/2004 of the European Parliament and of the Council and amending Regulations (EC) No 853/2004 and (EC) 854/2004
Regulation (EC)	OJ N° L 031,	Regulation (EC) No 178/2002 of the European Parliament

No 178/2002 of the European Parliament and of the Council	01.02.2002, p. 1	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
Regulation (EC) No 1774/2002 of the European Parliament and of the Council	OJ N° L 273, 10.10.2002, p. 1	Regulation (EC) No 1774/2002 of the European Parliament and of the Council of 3 October 2002 laying down health rules concerning animal by-products not intended for human consumption
Regulation (EC) No 852/2004 of the European Parliament and of the Council	OJ N° L 139, 30.04.2004, p. 1 corrected and re-published in OJ N° L 226, 25.06.2004, p. 3	Regulation (EC) No 852/2004 of the European Parliament and of the Council of 29 April 2004 on the hygiene of foodstuffs
Regulation (EC) No 853/2004 of the European Parliament and of the Council	OJ N° L 139, 30.04.2004, p. 55 corrected and re-published in OJ N° L 226, 25.06.2004, 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
Regulation (EC) No 854/2004 of the European Parliament and of the Council	OJ N° L 139, 30.04.2004, p. 206 corrected and re-published in OJ N° L 226, 25.06.2004, 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
Regulation (EC) No 882/2004 of the European Parliament and of the Council	OJ N° L 165, 30.04.2004, p. 1 corrected and re-published in OJ N° L 191, 28.05.2004, 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