

ANNEX

**Response of the Competent Authorities of the United Kingdom to the recommendations of Report ref. DG (SANCO)/2013-6726-MR of an audit carried out from 29 January to 08 February 2013 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**

N°.	Recommendation	Action Proposed by the Competent Authority
1	<p>The CCA should ensure that the approval of establishments is carried out in accordance with the requirements laid down in Article 31 of Regulation (EC) No 882/2004, in particular concerning conditional approval and activities authorised.</p>	<p>The approval of establishments is carried out in accordance with the policy outlined within the guidance document entitled “Operational Policy for Approval of Meat Establishments undertaken by FSA” , which was published in April 2012. This states: - “... the Agency shall grant <b>conditional approval</b> if the establishment meets all the infrastructure and equipment requirements.” The Policy further makes it clear that the conditional approval of an establishment must not extend beyond 6 months.</p> <p>To supplement and support the published Policy, the FSA maintains a document which acts as an aide memoire for Veterinary Managers conducting approval assessments. In response to this recommendation, this document has been updated to further emphasise the fact that the first priority when scheduling visits is to ensure that conditional approval of an establishment does not extend beyond six months.</p> <p>The CCA monitors the scheduling of visits by Veterinary Managers. In the event that a deadline is approaching, the Approvals Team alerts the relevant Veterinary Manager in order that they may take immediate action.</p> <p>On a monthly basis, a report is submitted to the Head of Approvals and Veterinary Advice, detailing the number of approvals assessments conducted. This report includes reference to any assessments which took place within the two weeks leading up to the six month deadline for conditional approval and any which extended beyond six months. For the year 2012-13, 172 establishments were granted conditional</p>

ANNEX

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		<p>approval; 0 conditional approvals extended beyond six months.</p> <p>Since October 2012, Official Veterinarians conducting audits have been asked to conduct a comparison of those activities for which the establishment is approved, against those activities which are being conducted. Where a discrepancy is identified at audit, the Approvals Team is notified and the Food Business Operator is informed of the requirement to apply for approval.</p> <p>Once the EU Commission issues its amendments to 853 Guidance covering the definition of meat products and meat preparations, we will ensure that local authorities and businesses are aware of the new definitions. We understand this will be finalised shortly.</p>
2	<p>The CCA should keep establishments' approval under review when carrying-out official controls as required by Article 31(2) of Regulation (EC) No 882/2004 and therefore ensuring that deficiencies found by the audit team are corrected in the establishments visited and are not present in the other ones.</p>	<p>The "Operational Policy for the Approval of Meat Establishments undertaken by the FSA" details the circumstances in which, during the course of carrying out official controls, a referral for the review of an establishment's approval status should be made. The Policy goes on to outline the process which will be followed once such a referral for review has been made.</p> <p>The Policy is augmented by instructions to operational staff entitled "Guidance on monitoring performance of establishments identified as a cause for concern". This contains details of the systems in place designed to encourage FBOs of establishments with serious deficiencies to raise their levels of compliance, and the actions to take in the event that standards are not brought to an acceptable level. Such</p>

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		<p>actions include referral for a formal review of the establishment'</p> <p>Approval status of establishments is discussed regularly by the Veterinary Managers involved in the approval process, both during weekly update teleconferences and bi-monthly technical meetings. These discussions promote consistency and correct application of the approvals process.</p> <p>To further strengthen the existing procedures, the FSA is planning a programme of visits to be conducted by Veterinary Managers. The purpose of these visits will be to provide verification of the level of compliance with all relevant requirements of food law. This programme will be independent to the regular official control audit visits. Where serious deficiencies are identified, the Veterinary Manager will recommend that the establishment be referred for formal review of its approval status. Less serious deficiencies will be notified to the field operational team to take forward through local enforcement.</p> <p>Operational field staff have been made aware of the deficiencies found by the FVO audit team and these will be monitored and corrected.</p> <p>An article summarising the findings of DG (SANCO)/2013-6726 will be prepared and published in the Operations Group internal technical update newssheet. This will serve as a general reminder to officers carrying out official controls at all approved establishments.</p>
3	The CCA should ensure that official controls are carried out regularly, on risk basis and appropriate frequency, at any of the	In approved slaughterhouses, FSA maintain a permanent presence for the delivery of official controls. In approved cutting plants, official

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	<p>stage of production, processing and distribution of food and of animals and animal products, including controls on FBO compliance with provisions in Regulation (EC) No 852/2004 on poultry farms as required under Article 3 of Regulation (EC) No 882/2004.</p>	<p>controls are delivered via unannounced visits. All approved establishments are formally audited at the frequency dictated by the risks presented- at 2, 3, 5, 8 or 12 month intervals.</p> <p>In relation to all establishments subject to local authority control, the FSA is currently undertaking a review of the Code of Practice to clarify and update the risk register used to assign intervention frequency scores, thereby enhancing consistency of approach by officers in intervention scoring.</p> <p>As regards primary production (such as poultry farms) the FSA intends to revise Food Law Practice Guidance by end of 2013 to include guidance on how to ensure that requirements for Official Controls are carried out at the appropriate intervention frequency and how to monitor compliance, in accordance with Regulation (EC) No 852/2004 and Article 3 of Regulation (EC) No 882/2004.</p>
4	<p>The CCA should ensure that official veterinarians carry out ante-mortem inspections on all animals in slaughterhouses in conformity with Point 1(a), Part B, Chapter II, Section I, Annex I to Regulation (EC) No 854/2004.</p>	<p>The FSA's Manual for Official Controls (MOC) contains instructions for Official Veterinarians in relation to official controls to be carried out by Food Standards Agency.</p> <p>In the event that ante-mortem inspection has not been completed at the holding, Chapter 2.2, Section 2 of the MOC contains the instructions for the OV at poultry slaughterhouses:</p> <p>When ante-mortem inspection is not carried out at the holding, the OV is to carry out a flock ante-mortem inspection at the slaughterhouse where:</p>

ANNEX

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		<ul style="list-style-type: none"> <li>• the overall health and welfare of each load must be assessed</li> <li>• ante-mortem should include listening to the birds and observation of a random sample checking posture, wattle colour and cleanliness, and</li> <li>• consider the information available from the FCI.</li> </ul> <p>An article summarising the findings of DG (SANCO)/2013-6726 will be prepared and published in the Operations Group internal technical update newssheet. This will serve as a general reminder to officers carrying out official controls at all approved establishments.</p> <p>The issue identified by the FVO auditors at the particular plant in question has been addressed.</p>
5	<p>The CCA should ensure that EU requirements on post-mortem inspection are respected in particular those concerning the speed of slaughter line which shall allow a proper inspection and offal must be subjected to post-mortem inspection (Part D, Chapter II, Section I, Annex I of Regulation (EC) No 854/2004).</p>	<p>Chapter 2.4 of the FSA's MOC instructs the inspector at poultry slaughterhouses to inspect the external surface of all carcasses and accompanying offal. The instructions also provide for the action to be taken when accompanying offal is not present- the OV should follow the hierarchy of enforcement when there is a significant increase in the level of inadequate presentation.</p> <p>FSA has taken stringent action, including action culminating in prosecution proceedings, in a number of cases where inadequate evisceration has not been satisfactorily addressed by the FBO following initial enforcement action.</p>

ANNEX

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		<p>An article summarising the findings of DG (SANCO)/2013-6726 will be prepared and published in the Operations Group internal technical update newssheet. This will serve as a general reminder to officers carrying out official controls at all approved establishments.</p> <p>In respect of the specific cases observed by the FVO audit team, the issues are being taken forward in the establishments concerned. In particular, at the establishment at which an inadequate designated inspection point was observed, this issue has been swiftly resolved through the removal of redundant equipment which has increased the space available. The other establishment where this issue was observed has re-aligned the evisceration equipment and both the removal of viscera and presentation for Post Mortem Inspection is now satisfactory.</p>
6	<p>The CCA should ensure that EU requirements for the production of minced meat on the age of raw material are respected (Chapter III (2)(b)(i) of Section V of Annex III to Regulation (EC) No 853/2004).</p>	<p>This matter has been the subject of correspondence between the CCA and the Commission for some time. The additional research was submitted to the Commission in November 2012 and a presentation was made to the Commission Working Group in February 2013. We understand that the Commission will now mandate EFSA to consider this further.</p> <p>Analysis of the data on the microbiological status of minced meat shows there is no correlation between the storage time of chilled meat prior to mincing and the levels of indicator organisms in minced meat. This absence of relationship is shown well beyond the time limits provided in the legislation. This suggests that the age of meat used to produce</p>

ANNEX

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		<p>mince in plants where effective HACCP-based plans are implemented (as required by the hygiene legislation) has limited impact on the microbiological safety and quality of minced meat. The key factors in controlling microbiological status of minced meat have been identified as initial bacterial load of carcasses and meat to be minced, primary chilling, storage temperatures; mincing and packaging conditions. Our research shows information is available to allow food businesses to develop evidence-based risk management strategies to control these factors effectively within HACCP-based systems.</p>
7	<p>The CCA should ensure that when FBO own-check sampling programmes are implemented, the sampling protocols and test methods used are in compliance with EU requirements (Regulation (EC) No 2073/2005).</p>	<p>Training for Lead Veterinarians and Veterinary Managers was undertaken to ensure checks for FBO compliance with Regulation (EC) No 2073/2005. The training course, including training on sampling protocols and test methods, was delivered in March 2013. The training on monitoring FBO compliance with (EC) No 2073/2005 is being cascaded to Official Veterinarians via their employing contractor practices under the managed service agreement.</p> <p>A new section for inclusion in The Manual for Official Controls, detailing the actions that operational staff should take in order to verify FBO compliance, is currently under development and is intended for publication by October 2013.</p>
8	<p>The CCA should ensure that EU requirements for the correct use of food additives are respected (Regulation (EC) No 1333/2008).</p>	<p>FSA to write to enforcement officers in UK local authorities to advise on the permitted use of food additives in poultry meat and related products, under Regulation 1333/2008, by the end of April 2013.</p>