ANNEX

Response of the Competent Authorities of the United Kingdom to the recommendations of Report ref. DG(SANCO)/2013-6906-MR of an audit carried out from 22 April to 03 May 2013 in order to evaluate the control of residues and contaminants in live animals and animal products

N°.	Recommendation	Action Proposed by the Competent Authority
1	Ensure that milk from other species (goat) as required in Chapter 1.2 as well as eggs from other species as required in Chapter 2.2 of the Annex to Commission Decision 97/747/EC are included in the RMP.	Goats' milk and eggs from other species will be included in RMPs from 2014. Discussion on the number of samples to be taken will be agreed at the planning meeting scheduled in September 2013.
2	Ensure that the official RMP controls on farms are carried out on a risk basis taking account of identified risks when choosing farms to be sampled as required by Article 3(1) of Regulation (EC) No 882/2004, and ensure in addition that the implementation of the RMP, in particular targeting of farms for routine sampling, is consistent throughout the UK as required by Article 4(4) of Regulation (EC) No 882/2004.	The practice in NI of targeting farms which had a non-compliant result the previous year will be extended to GB in 2014. Discussions will take place with sample collectors to aim for a more targeted approach where this is needed.
3	Ensure that suspect samples for the detection of pharmacologically active substances are taken: a.) when there are indications to suspect non-compliances with regard the residue status of an animal, as required by Article 24(1) of Council Directive 96/23/EC, and b.) in line with the FSA staff instructions for implementation of the RMP, as required by point 2.3.2.2. of Commission Decision 98/179/EC.	Staff in slaughterhouses will be reminded of the need to take suspect samples where circumstances deem it appropriate. Numbers of suspect samples taken will continue to be monitored, and this will be included as part of any forthcoming planned audits at slaughterhouses.
4	Ensure effective and efficient coordination and cooperation between different competent authorities as required by Article 4(5) of Regulation (EC) No 882/2004 to allow that official controls in slaughterhouses are carried out on a risk basis (taking	Fera sends all non-compliant results (slaughterhouse and on-farm) to VMD and FSA Policy. In future they will also be sent to FSA Operations. Further targeted sampling of animals being submitted from farms that have had previous non-compliant samples will take place.

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	account of information which might indicate non-compliance), as required by Article 3(1) of Regulation (EC) No 882/2004 and point 2.3.3.1. of Commission Decision 98/179/EC in order to comply with requirements laid down in Article 24 of Council Directive 96/23/EC.	
5	Ensure and verify the effectiveness and appropriateness of official controls in relation to food chain information, as required by Article 4(2) (a) and Article 8(3) of Regulation (EC) No 882/2004 in all slaughterhouses.	By the end of 2013 the FSA will review model documents for Food Chain Information for all species and will consider the need to introduce model FCI document for equines where not in use. The OVs will be reminded through the Tech Files communication tool of their responsibility to check FCI effectively by October 2013. The FSA will follow this up by conducting targeted themed visits to all slaughterhouses to verify OV's implementation of instructions contained in the MOC in relation to FCI. These visits will take place during the first quarter, from April 2014.
6	Ensure that official controls regarding on-farm veterinary medicinal treatment records are fully effective and appropriate, as required by Article 4(2)(a) of Regulation (EC) No 882/2004.	AHVLA staff will be reminded of this requirement as set out in the field instructions. VMD staff will also attend AHVLA regional conferences to reiterate the importance of ensuring thorough checks are carried out on farm.
7	Ensure that the responsible veterinary practitioners and horse owners correctly ascertain the equine animal´s status as either	National legislation makes it an offence for vets not to comply with Article 20 of Regulation (EC) No 504/2008. The UK Chief Veterinary

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	intended for slaughter for human consumption or not, as set out in Part II of Section IX of the identification document and as required by Article 20 of Regulation (EC) No 504/2008.	Officer has written to vets reminding them of their obligations and we will continue to take opportunities to raise awareness amongst the veterinary and horse owning community through appropriate channels. We take action where clear cases of non compliance are found.
8	Ensure that equine passports are issued within the time periods set down in Article 5 of Regulation (EC) No 504/2008, and that measures to implement sanctions applicable to infringements of the cited Regulation are fully in place, as required by Article 55 of Regulation (EC) No 882/2004.	National legislation makes it an offence to fail to comply with the time limits set out in Article 5 of Regulation (EC) No 504/2008. Information and advice on the legal requirements relating to horse owners is provided on GOV.UK and websites of the devolved Governments and we take opportunities to remind owners of their responsibilities using appropriate channels. We will be reminding Passport Issuing Organisations (PIOs) of the rules on time limits. Local Authority Trading Standards enforce this requirement by issuing warning letters and can prosecute in instances of serious and persistent non-compliance.
9	Ensure that the passport issuing organizations take appropriate measures when issuing a replacement or duplicate identification document to sign the respective horse out of the food chain, following the requirements laid down in Articles 16 and 17 of the Regulation (EC) No 504/2008, and that on change of ownership of equidae, passports are immediately lodged with these organisations, giving the name and address of the new owner, for re-registration and forwarding to the new owner, as required in Section III of the Annex to the cited Regulation.	National legislation makes it an offence to fail to comply with these requirements. Where allegations of offences are brought to our attention we pass these on to the relevant Local Authority Trading Standards for investigation. We have recently reminded PIOs of the rules on duplicate and replacement passports. Information and advice on the legal requirements for horse owners is provided on GOV.UK and websites of the devolved Governments; we will continue to take opportunities to remind owners

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		of their responsibilities using appropriate channels.
10	Ensure that the validation of methods fully complies with Commission Decision 2002/657/EC, also with regard to “within-laboratory reproducibility” and "applicability" and "ruggedness".	Fera has validation data demonstrating applicability/ruggedness for each method with regard to major changes i.e. commodity/matrix combinations. This meets the requirements of CD2002/657/EC section 3.1.2.7 ‘Ruggedness (major changes).’ There is no requirement in Commission Decision 2002/657/EC to provide reliable data about the “applicability” and “ruggedness” of the methods over time. However, Fera does monitor the applicability and ruggedness over time using a number of systems. One of these is the collection of QC data with each batch where different analysts, solvent batches, SPE batches etc. have been used for the analysis of each method. This data was collated earlier this year and is available for inspection. These data were available at the time of the audit and we would therefore ask that this recommendation is removed.
11	Ensure that all RMP samples are divided into at least two equivalent sub-samples, as required in point 2.5 of the Annex to	This is already being done to a satisfactory standard for samples which screen non-compliant at Fera, which handles over 90% of samples

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	Commission Decision 98/179/EC.	analysed annually in the UK. NI will modify its current sample splitting procedures to mirror the GB process within the next 12 months.