

ANNEX B

Response of the Competent Authorities of the United Kingdom to the recommendations of Report ref. DG(SANCO)/2013-6699-MR of an audit carried out from 11 to 20 June 2013 in order to evaluate the Salmonella National Control Programmes in particular poultry populations (breeders, laying hens, broilers and turkeys)

N°	Recommendation	Action Proposed by the Competent Authority
1	<p>Where specific tasks related to official controls are delegated to one or more control bodies, the CCA should ensure that the results of the controls carried out by the control bodies are communicated to the CCA on a regular basis in compliance with the requirements of Article 5(2)(e) of Regulation (EC) No 882/2004.</p>	<p>The specific tasks related to official controls that have been delegated to approved Independent Control Bodies (ICBs) for the laying chicken and turkey sectors are: (1) the routine annual official sampling and (2) verification of operator compliance with the <i>Salmonella</i> Control Programme sampling requirements¹.</p> <p>Procedures for verifying the completion of annual official sampling by the ICBs have been in place since initial approval of each body (2008 and 2010 for the laying chicken and turkey sector ICBs respectively). These procedures include collation of all official sample submission forms by the official testing laboratory and the <i>Salmonella</i> Specialist Service Centre (SSC) within the Animal Health and Veterinary Laboratories Agency (AHVLA). This data is recorded on spreadsheets for each year by SSC. The number of samples taken and the results are included in quarterly reports forwarded to the Central Competent Authority (CCA). In addition, a minimum of two meetings per year are held involving both ICBs. Using these procedures, the CCA have been able to verify that 100% of official sampling requirements have been completed each year, since the UK National Control Programmes (NCPs) were implemented in the turkey and layer sectors. We propose to continue with this system.</p> <p>However, we acknowledge that, there were only informal procedures in place for reporting of operator non compliance with the sampling protocol (frequency in particular) for both poultry sectors for which an ICB has been approved. Therefore, communication regarding verification of operator compliance with sampling protocols will be enhanced to provide the required guarantees. This</p>

¹ Recommendations 1 and 2 do not apply to Northern Ireland as there are no Independent Control Bodies currently approved to carry out delegated official tasks under the SNCs

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		<p>enhancement will include:</p> <ul style="list-style-type: none"> • Monthly returns on any non compliance detected (already underway for the layer sector from the beginning of 2013, but will be extended to the turkey sector in the last quarter of 2013); • Completion of 'SL47' form (similar to those used by competent authority staff when doing official sampling) by the ICB auditors will be required during all routine official sampling visits. The forms will collated and made available for audit by the CA. In case of detection of significant non compliance, forms will be forwarded immediately to AHVLA (SSC). This will be implemented in the last quarter of 2013. <p>The CCA will provide a further update on progress with the above, by November 2013.</p>
2	<p>Where specific tasks related to official controls are delegated to one or more control bodies, the CCA should ensure that audits or inspections of control bodies are organised by the delegating competent authority in compliance with the requirements of Article 5(3) of Regulation (EC) No 882/2004.</p>	<p>ICB audits will be implemented fully across the turkey and layer sectors and will be extended to any further ICBs approved in the UK in future. The detail is set out in the ICB Review document, which was shared with the FVO inspectors during their audit visit. In summary, this includes:</p> <ul style="list-style-type: none"> • Continuation of regular meetings between the CCA and ICB; • Procedures, which will be subject to CCA audit, for clear lines of communication and specific time targets to notify major operator sampling non-compliance and changes to the farms involved in the specific farm assurance scheme that the ICB covers; • Inspection and verification of ICB procedures and record-keeping; • Continued involvement in and oversight of training for the ICB's auditors; • Investigation of any suspicion of quality issues relating either to an individual auditor or more widely across the ICB's team (to include, where necessary, joint farm visits carried out by CA

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		<p>staff with the ICB auditor to assess auditor competence in carrying out the delegated official tasks).</p> <p>The ICB Review document will require some minor revisions to address specific auditing function requirements according to Regulation (EC) No. 882/2004, as noted during the FVO mission. These amendments will be made and agreed by the Competent Authorities in Great Britain¹, with an expected implementation date during the last quarter of 2013.</p> <p>The CCA will provide a further update on progress with the above, by November 2013.</p>
3	<p>The CCA should ensure that official controls are carried out regularly, at any stages of production (in particular on the farms), on a risk basis and, with an appropriate frequency, including controls on FBO compliance with the requirements of Regulation (EC) No 852/2004 (Article 3 of Regulation (EC) No 882/2004).</p>	<p>The UK <i>Salmonella</i> Control Programmes include a requirement to carry out risk based sampling of all flocks present on the site, following detection of a positive flock (regulated serovar) on a premise and all flocks in the following crop (broiler chickens/ fattening turkeys). At each official sampling visit (routine and risk based), a farm inspection is carried out and an SL47 form is used for recording the inspection.</p> <p>Prior to the FVO's visit, the CCA had amended the farm inspection record document (SL47 form) to include a formal record of the biosecurity checks currently undertaken. Following confirmation from the FVO inspectors during the visit that this new form should be sufficient to address the recording requirements, the biosecurity check will now be recorded on the revised SL47 form by AHVLA from September 2013.</p>

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		<p>Premises are also considered a higher risk if no <i>Salmonella</i> NCP result is included in the food chain information documentation accompanying the birds to slaughter, as required by Regulation (EC) No. 853/2004. In such circumstances, notification is sent to AHVLA by the Food Standards Agency Official Veterinarians at the slaughterhouse and appropriate action is taken, including official sampling of the flocks on such sites and the carrying out of a farm inspection, as required.</p> <p>In addition, a full investigatory visit ('ZO4 visit') is carried out on farm following detection of a positive regulated serovar or a non regulated <i>Salmonella</i> serovar considered to be of special public health significance. An epidemiological investigation is carried out during these visits in an attempt to determine the potential source of the <i>Salmonella</i> infection, which includes detailed assessment of the biosecurity measures in place on the farm. Recommendations are made for improvement in cases where shortfalls are identified.</p> <p>We propose to implement the use of the SL47 form to record on-farm biosecurity checks and to continue with the procedures currently in place as detailed above to address the recommendation for risk based official controls. To further develop the existing procedures for the turkey sector, the CCA is considering delegation of the biosecurity checks on turkey breeding and fattening farms to the turkey sector ICB. This will result in the CCA being able to implement enhanced supervision of premises if non-compliance is found. Approval of the turkey sector ICB for delegation of this additional official task should be in place by the end of 2013.</p>
4	The CCA should ensure that the	The FVO inspectors acknowledged that the deficiency (incorrect volume of sample submitted and

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	<p>monitoring and sampling programme applied in laying flocks is fully compliant with the requirements of Regulation (EC) No 2160/2003 and Regulation (EU) No 517/2011, in particular regarding sampling protocol used and the procedures to be followed in the case of positive own-check sample results.</p>	<p>tested under the <i>Salmonella</i> NCP) detected on one UK laying chicken farm was an isolated case and not a systematic problem. However, the CCA will revise the text in the relevant UK guidance document for the laying chicken sector to emphasise this requirement and the action that will be taken in the event of non compliance. The revised guidance document will be re-distributed to Food Business Operators (FBOs) by the last quarter of 2013.</p> <p>The CCA will also communicate with the private laboratories which are approved to test samples under the requirements of the <i>Salmonella</i> Control Programmes and reiterate their duty to assess whether a sample is fit for purpose and not to test it if it is non-compliant, as detailed in the current Government approved laboratory guidance document. Additionally, this requirement will be highlighted to the UK nominated accreditation body for ISO17025 accreditation, the United Kingdom Accreditation Service (UKAS). This will be achieved by arranging a meeting with the approved laboratories and UKAS, to be held no later than end October 2013.</p> <p>AHVLA and Scottish Poultry Unit (SPU) staff will be made aware of these initiatives. Suitable text will be added to each organisation's field instructions to emphasize the requirement to check sample suitability, as well as sampling schedules at the time of farm audit visits. ICB instructions will also be amended in line with this. The revised instructions should be in place and communicated to staff by no later than the last quarter of 2013, to coincide with the meeting to be held with the approved private laboratory stakeholders.</p> <p>Discussions are ongoing at a national level with respect to implementation of revised procedures following the identification of a positive own check (FBO) sample. The UK CCA will provide an</p>

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		update on progress by November 2013.
5	The CCA should ensure that the monitoring and sampling programme applied in turkeys is fully compliant with the requirements of Regulation (EC) No 2160/2003 and Regulation (EU) No 1190/2012, in particular regarding sampling protocol used.	<p>The FVO inspectors noted that in respect of operator samples taken on the breeding turkey farm, although the correct numbers of pairs of boot swabs (5) were collected, they were pooled into only one pool for transit to the laboratory. This was contrary to our national guidance and code of practice, as well as contrary to the requirements of the Regulation. This is believed to be an isolated incident and has been followed up with the farm and laboratory concerned.</p> <p>Since the FVO audit, our guidance and code of practice documents have been revised and re-circulated to stakeholders to better emphasise the requirement to send samples to the laboratory in separate pools. These documents have also been amended to clarify the message that antimicrobial usage should be considered when organising sampling plans, to remind operators that sampling should not be carried out during treatment and that repeat sampling will be required in the event that antimicrobial usage may have influenced the <i>Salmonella</i> test result. The official sample submission forms for the turkey NCP (CSTO26 and CSTO 27) were revised in early 2013 to better reflect the situation at the time of sampling in terms of recent antimicrobial usage, and were shared with the FVO inspectors at the time of their visit.</p>