

Annex A

**Comments of the Competent Authority of the United Kingdom on Draft Report 2013-6699 of an audit carried out from 11<sup>th</sup> to 20<sup>th</sup> June 2013 in order to evaluate the Salmonella National Control Programmes in particular poultry populations (breeders, Laying hens, Broilers and Turkeys)**

Section/ page number	Original draft text	Substantive comments and suggested drafting changes	CA Comment
<p><b>Page I - Executive Summary</b></p>	<p>However, in the areas where official controls are delegated to independent control bodies, the system cannot provide guarantees to the competent authorities that the requirements related to the control programmes are properly implemented. This is mainly due to the unstructured nature of communication of results by control bodies to the competent authorities as well as to the absence of an auditing system on these control bodies.</p>	<p>However, in the areas where official controls are delegated to independent control bodies, the system cannot provide guarantees to the competent authorities that the <u>sampling</u> requirements related to the control programmes are properly implemented <u>by food business operators</u>. This is mainly due to the unstructured nature of communication of results <u>of operator compliance verification checks</u> by control bodies to the competent authorities as well as to the absence of an auditing system on these control bodies.</p>	<p><b>Comment for factual correction and/or clarification:</b> Suggested text to take into consideration that the UK CA demonstrated the procedures in place for verifying completion of all official sampling requirements by the ICBs (Independent Control Body) (one of the two delegated official tasks). The formalised procedures have been in place since initial approval of each body (2008 and 2010 for the laying chicken and turkey sectors ICBs respectively). The 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. Cross – checking is carried out against the population data held by the CA and provided by the ICB/FAS. The number of samples taken and the results are included in quarterly reports forwarded to the CCA. Using these procedures, the CCA is able to verify that 100% of official sampling requirements have been completed each year, since the NCPs were put in place in the turkey and layer sectors.</p> <p>However, we acknowledge that there were only informal processes in place for reporting of operator non</p>

			<p>compliance with the sampling protocol (frequency in particular) for both poultry sectors before January 2013. Thereafter, a formal system of communication has only been implemented for the layer sector (as demonstrated by the email communications and ‘compliance’ Excel spreadsheets forwarded to the CA since January 2013 and the penalty notices (fines) issued to FAS members in the layer sector following receipt of this information since the start of the year).</p> <p>We agree that for the turkey ICB, these formalised processes for communication to verify operator compliance with the testing requirements of the turkey NCP will need to be implemented.</p>
<p><b>Page 1 – Section 2</b> Objectives: table</p>	<p>1 - This ICB is responsible for official sampling in the laying hen sector (delegated specific task related to official controls)</p>	<p><del>2 - This</del> <u>The two ICBs</u> <del>is</del> <u>are</u> responsible for <u>official sampling and operator sampling compliance verification</u> in the laying hen <u>and turkey</u> sectors (delegated specific tasks related to official controls).</p>	<p><b>Comment for factual correction :</b> Representatives from the Food Business Operators Control Programme and the approved ICB for the laying chicken sector SNCP were present at the meeting in person. The representative from the turkey sector ICB was also present and contributed by teleconference.</p>
<p><b>Page 2 – Section 4</b> Background</p>	<p>In the UK, according to the CA, in 2012 there were 493 breeding hen holdings, 1,631 holdings of laying hens, 472 broiler holdings, 85 breeding turkey holdings (adult) and 812 turkey fattener holdings subject to SNCPS.</p>	<p>In the UK, according to the CA, in 2012 there were 493 breeding hen holdings, 1,631 holdings of laying hens, <u>1,472</u> broiler holdings, 85 breeding turkey holdings (adult) and 812 turkey fattener holdings subject to SNCPS.</p>	<p><b>Comment for factual correction:</b> Suggested amendment of typographical error - reference the pre-audit questionnaire indicating 1,472 broiler holdings in the UK.</p>
<p><b>Page 3 – Section 5.1</b> Competent Authority:</p>	<p>Key AHVLA functions specifically related to the implementation of the SNCPS include delivery of official control</p>	<p>Key AHVLA functions specifically related to the implementation of the SNCPS include delivery of official control sampling, disease control and</p>	<p><b>Comment for factual correction and/or clarification:</b> AHVLA is not responsible for hygiene inspections or enforcement of the egg marketing regulations on laying chicken farms in Scotland.</p>

Audit findings	sampling, disease control and enforcement measures, collection and collation of data on implementation of the programmes, provision of advice and training to official staff and official laboratory services.	enforcement measures, collection and collation of data on implementation of the programmes, provision of advice and training to official staff and official laboratory services. <u>The Scottish Egg and Poultry Unit enforces egg marketing standards in Scotland.</u>	
<b>Page 3 – Section 5.1</b> Competent Authority: Audit findings	They provided evidence of cases when penalty notices were issued by AHVLA due to the placing of eggs on the market without testing the flock for <i>Salmonella</i> .	They provided evidence of cases when penalty notices were issued by AHVLA due to the placing of eggs on the market <del>without testing the flock for <i>Salmonella</i></del> <u>or when the required flock testing protocol was not fully adhered to.</u>	<b>Comment for factual correction and/or clarification:</b> Suggested text amendment for clarification because there have not been any cases recorded in the UK to date where a laying chicken flock operator has not done any testing of his laying flock(s) and still placed eggs on the market, in contravention of the legislation requirements. The cases of non compliance detected and where operators have received fixed penalty notices (fines) have all been cases where farmers have not adhered fully to the testing protocol – i.e. the time between tests has exceeded the required 15 week testing interval, or flocks were tested late at the start of production (not within the specified 22-26 weeks of age range).
<b>Page 3 – Section 5.1</b> Competent Authority: Audit findings	In the case of laying hen and turkey farms outside FAS these tasks are carried out directly by the CA.	In the case of laying hen and turkey farms outside <u>a FAS for which an ICB has been nominated to carry out the delegated official tasks</u> , these tasks are carried out directly by the CA.	<b>Comment for factual correction and/or clarification:</b> Suggested text amendment as there are many different Farm Assurance Schemes (FAS) in the UK, but only two such schemes have nominated ICBs that are approved to carry out the delegated official tasks under Regulation (EC) No. 882/2004 for the <i>Salmonella</i> Control Programmes. Therefore, the CA still carries out official controls at all farms belonging to other FASs.
<b>Page 3 – Section 5.1</b> Competent Authority:	The audit team was informed by the CCA that in the beginning of the implementation of the programmes specific training	The audit team was informed by the CCA that in the beginning of the implementation of the programmes specific training courses were organised	<b>Comment for factual correction and/or clarification:</b> The training carried out is UK wide and therefore includes staff working on the implementation of the <i>Salmonella</i> programmes in Northern Ireland.

Audit findings - Training	courses were organised for AHVLA staff (most recently “Salmonella in poultry training day” in 2012 and 2013)	for AHVLA <u>and DARD</u> staff (most recently “Salmonella in poultry training day” in 2012 and 2013).	
<b>Page 3 – Section 5.1</b> Competent Authority: Audit findings - Training	The audit team saw evidence of training (February 2013) provided to ICB auditors involved in the implementation of the SNCP for the laying hen sector. This training session was jointly organised by the ICB and AHVLA.	The audit team saw evidence of <u>ongoing</u> training ( <del>February 2013</del> ) provided to ICB auditors involved in the implementation of the SNCP for the laying hen sector. These training sessions <u>are</u> <del>was</del> jointly organised by the <u>Food Business Operators’ Control Programme (in the case of laying hens), the respective</u> ICB and AHVLA.	<b>Comment for factual correction and/or clarification:</b> There have been several such training sessions for the layer sector ICB (2007, 2008, 2009 and 2012 as well as the training session in February 2013), and one for the turkey ICB (19 <sup>th</sup> January 2010). A further session is planned for later in 2013 for the turkey ICB. Evidence demonstrating this ongoing training programme was shared with the FVO inspectors during the Mission visit, including the presentations from the most recent training days.
<b>Page 4 – Section 5.1</b> Competent Authority: Audit findings – Official supervision of the Independent Control Bodies	The CA informed the audit team that until the end of 2012 there was no reporting system in place between the ICBs and the CA.  The CA presented to the audit team some examples of non-compliances reported by the ICBs to AHVLA and based on this correspondence AHVLA imposed sanctions. However, the audit team noted that these cases were related to the laying hen sector and from 2013 onwards only. The audit team was provided by the CA with the procedures which they intend to implement in order to formalise the reporting system between the ICBs and the CA.	The CA informed the audit team that, <u>although there was a reporting system in place for official sampling</u> , until the end of 2012 there was no <u>formal structured</u> reporting system in place between the ICBs and the CA <u>on the results of ICB verification of operator sampling</u> .  The CA presented to the audit team some examples of non-compliances reported by the ICBs to AHVLA and based on this correspondence AHVLA imposed sanctions. However, the audit team noted that these cases were related to the laying hen sector and from 2013 onwards only. The audit team was provided by the CA with the procedures which they <u>have implemented in the</u>	<b>Comment for factual correction and/or clarification:</b> Suggested text to take into consideration that the UK CA demonstrated the procedures in place for verifying completion of all official sampling requirements by the ICBs (one of the two delegated official tasks). The formalised procedures have been in place since initial approval of each body (2008 and 2010 for the laying chicken and turkey sector ICBs respectively). The 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). The data is recorded on spreadsheets for each year by SSC. Cross – checking is carried out against the population data held by the CA and provided by the ICB/FAS. The number of samples taken and the results are included in quarterly reports forwarded to the CCA. Using these procedures, the CCA is able to verify that 100% of official sampling requirements have been completed each

		<p><u>laying chicken sector and</u> intend to implement <u>in the turkey sector</u> in order to formalise the reporting system between the ICBs and the CA.</p>	<p>year, since the NCPs were put in place in the turkey and layer sectors.</p> <p>However, we acknowledge that there were only informal processes in place for reporting of operator non compliance with the sampling protocol (frequency in particular) for both poultry sectors subject to official sampling by an ICB, before January 2013. Thereafter, a formal system of communication has only been implemented for the layer sector (as demonstrated by the email communications and ‘compliance’ Excel spreadsheets forwarded to the CA since January 2013 and the penalty notices (fines) issued to FAS members in the layer sector following receipt of this information since the start of the year).</p>
<p><b>Page 5 – Section 5.2</b> Controls at the farm level: audit findings</p>	<p>The audit team was informed by the CA that breeding and fattening turkey farms and laying hen farms which chose to operate under FAS have to comply with specific documented standards for farm management including biosecurity requirements. Scheme members are audited annually or every 18 months (depending on the Scheme) against these standards by ICBs and membership is withdrawn in cases of serious non-compliances. However, the audit team noted that these ICB audits include delegated official tasks (control of</p>	<p>The audit team was informed by the CA that breeding and fattening turkey farms and laying hen farms which chose to operate under <u>specific FAS</u> have to comply with specific documented standards for farm management including biosecurity requirements <u>as specified by the respective FAS</u>. Scheme members are audited annually or every 18 months (depending on the Scheme) against these standards by <u>an ISO accredited certification body designated by the FAS</u> ICBs and membership is withdrawn in cases of serious non-compliances. <u>The FASs’ nominated certification auditors have been appointed to function as industry</u></p>	<p><b>Comment for factual correction and/or clarification:</b> Suggested text amendments to provide clarification of the dual functions of the ICB:</p> <ul style="list-style-type: none"> <li>• firstly as a certification body responsible for auditing members of the specific FAS, against that FAS’s requirements (a function that is not a delegated official task and is wholly under the auspices of the industry operated FAS);</li> <li>• secondly, the official tasks specifically delegated by the CA according to Regulation (EC) No. 882/2004, which are carried out separately at the time of the FAS audit.</li> </ul>

	<p>the performance of the FBO sampling) and supplementary checks pertaining to the specific FAS. As the ICBs produce a single audit report, they don't communicate them to the CA, considering that they contain confidential information.</p>	<p><u>Independent Control Bodies (ICBs) and carry out delegated official tasks: verification of operator sampling and the collection of routine annual official control samples. These tasks are carried out at the same time that the farm is visited for the FAS general audit.</u> However, the audit team noted that these ICB audits include delegated official tasks (control of the performance of the FBO sampling) and supplementary checks pertaining to the specific FAS. As the ICBs produce a single audit report, they don't communicate them to the CA, considering that they contain confidential information <u>regarding the results of the overall audit of all the FAS requirements as well as information on the audit of operator sampling compliance as a delegated official task.</u></p>	
<p><b>Page 6 – Section 5.2</b> Controls at the farm level: <u>Feed control</u></p>	<p>The audit team was informed by the FBO in both farms that the possible interference of antibiotic treatments with <i>Salmonella</i> testing is not taken into account and that this is a legal requirement during official sampling only</p>	<p>The audit team was informed by the FBO in both farms that the possible interference of antibiotic treatments with <i>Salmonella</i> testing is not taken into account and <u>the FBO erroneously considered</u> that this is a legal requirement during official sampling only.</p>	<p><b>Comment for factual correction and/or clarification:</b> It is not UK national policy that potential interference with the <i>Salmonella</i> result during the use of antibiotic treatment is considered only during official sampling. Prescribing practices and the implications of the use of antibiotics are the responsibility of the operator's private veterinary surgeon, who was aware of the need to consider when antimicrobial medication may influence the likelihood of identifying a <i>Salmonella</i> positive farm.</p>

<p><b>Page 6 - Section 5.2</b> Controls at the farm level: <u>Cleaning and disinfection after depopulation of a positive flock</u></p>	<p>Evidence of this sampling was provided to the audit team. However, in the breeding sectors environmental samples are mandatory in cases of <i>Salmonella</i> positive flocks.</p>	<p>Evidence of this sampling was provided to the audit team. However, in the breeding <u>chicken/turkey, broiler and fattening turkey</u> sectors, environmental samples are mandatory in cases of <i>Salmonella</i> positive flocks.</p>	<p><b>Comment for factual correction and/or clarification:</b> Suggested text for correction - as per requirements of the SNCP guidance documents, post cleansing and disinfection environmental samples are also required in the breeding turkey, fattening turkey and broiler sectors.</p>
<p><b>Page 7 – Section 5.3</b> General issues on SNCPs</p>	<p>In GB in broiler flocks and in breeding flocks of <i>Gallus gallus</i> official samples are taken by AHVLA staff. Whilst in turkey flocks (fattening and breeding) and in laying hen flocks official sampling is carried out either by ICBs (for scheme members) or by AHVLA staff (for holdings outside schemes). In Northern Ireland official samples are taken by DARD.</p>	<p>In GB in broiler flocks and in breeding flocks of <i>Gallus gallus</i> official samples are taken by AHVLA staff. Whilst in turkey flocks (fattening and breeding) and in laying hen flocks <u>routine</u> official sampling is carried out by <u>the respective ICB</u> (for scheme members <u>with a designated ICB</u>) or by AHVLA staff (for holdings outside <u>schemes</u>). <u>All official sampling undertaken after a suspect or positive is identified is carried out by AHVLA</u>. In Northern Ireland <u>all</u> official samples are taken by DARD.</p>	<p><b>Comment for factual correction and/or clarification:</b> As per comment above, not all FAS have a designated approved ICB to carry out delegated official tasks for the SNCPs. Additionally, as a point for clarification, ICBs only undertake routine official sampling, not suspect official sampling or official sampling required following a positive target serovar result.</p>
<p><b>Page 7 – Section 5.3</b> General issues on SNCPs</p>	<p>For non-Group B/D isolates no electronic alert is sent.</p>	<p>For non-Group B/D/<u>C</u> isolates no electronic alert is sent.</p>	<p><b>Comment for factual correction and/or clarification:</b> Suggested text for factual correction - automatic e-mail alerts are also sent for the other serovars considered to be important (<i>Salmonella</i> Hadar, Infantis and Virchow). The finding of these serotypes requires official action for the breeding chicken SNCP and also generally results in official action in the other poultry sectors (for example, the</p>

			carrying out of a ‘ZO4 visit’). Automatic email alerts are also generated for high priority multiple antimicrobial resistant isolates that are not normally present in UK, or that present a high risk of treatment failure in human cases.
<b>Page 9 – Section 5.4</b> SNCP for Breeding Hens	The audit team was informed by the CA that in the case of detection of SE/ST in FBOs’ own-check samples, official confirmatory sampling may be carried out e.g. if the samples were tested in a private laboratory and <i>Salmonella</i> was not detected previously. According to the data provided by the CA, in 2012 in breeding flocks of <i>Gallus gallus</i> five FBO samples turned out to be positive and only one confirmatory sampling was carried out and tested negative.	The audit team was informed by the CA that in the case of detection of SE/ST in FBOs’ own-check samples, official confirmatory sampling may be carried out e.g. if the samples were tested in a private laboratory and <i>Salmonella</i> was not detected previously. According to the data provided by the CA, in 2012 in breeding flocks of <i>Gallus gallus</i> five FBO samples turned out to be positive <u>for <i>Salmonella</i> spp Groups B, C or D.</u> <u>Only one sample turned out to be positive for a target serovar</u> and only one confirmatory sampling was carried out and tested negative.	<b>Comment for factual correction and/or clarification:</b> Suggested text amendment to clarify that there were not five positive target serovars reported from breeding chicken flocks in the UK during 2012. Four of the five ‘suspect’ target serovars (i.e. at the group stage were detected as Group B, D or C) were actually typed as other non target <i>Salmonella</i> spp.
<b>Page 9 – Section 5.5</b> SNCP for laying hens	Although it is not mandatory either under the programmes or under EU legislation, vaccination against ST/SE was carried out in all flocks visited. However, the audit team was informed by the CA that vaccination is mandatory for holdings which are members of FAS (approximately 90 % of UK egg production is covered under these schemes).	However, the audit team was informed by the CA that vaccination is mandatory for holdings which are members of <u>the largest</u> FAS (approximately 90 % of UK egg production is covered under <del>these</del> <u>this specific</u> schemes).	<b>Comment for factual correction and/or clarification:</b> Suggested text amendment for clarification that vaccination is not a mandatory requirement for all FAS, but is specifically a requirement for the largest scheme in the UK, which alone covers 90% of UK production.

<p><b>Page 10 – Section 5.5</b> SNCP for laying hens</p>	<p>The CA explained to the audit team that under the SNCP if a layer flock tests positive in own-check analyses for the targeted serovars, the CA carries out a routine official confirmatory sampling (within 48 hours) by using the normal sampling protocol (three samples of faeces or three pairs of boot swabs). No official restrictive measures are applied against the flock or the eggs until results of confirmatory sampling are available.</p>	<p>The CA explained to the audit team that under the SNCP if a layer flock tests positive in own-check analyses for the targeted serovars, the CA carries out a routine official confirmatory sampling (within 48 hours) by using the normal sampling protocol (<u>as per paragraph 2.2.2 of the Annex to Regulation 517/2011</u> <del>three samples of faeces or three pairs of boot swabs</del>). No official restrictive measures are applied against the flock or the eggs until results of confirmatory sampling are available.</p>	<p><b>Comment for factual correction and/or clarification:</b> Suggested text amendment, as the sampling protocol used is as detailed in the Regulation and so can include a dust sample as well as the faeces/bootswab samples.</p>
<p><b>Page 11 – Section 5.7</b> SNCP for turkeys: <u>Breeding turkeys</u></p>	<p>The audit team noted that to date the farm visited has not been officially sampled. Under the previous applicable legislation only 10% of holdings were subject to official sampling and the farm had not been selected.</p>	<p><del>The audit team noted that to date the farm visited has not been officially sampled.</del> Under the previous applicable legislation only 10% of <u>parent</u> holdings were subject to official sampling. <del>and the farm had not been selected.</del></p>	<p><b>Comment for factual correction and/or clarification:</b> An official hatchery sample had been collected from this breeding farm (sample submission form provided at the visit to the CA office), therefore suggested text amendment for factual correction.</p>
<p><b>Page 12 – Section 5.8</b> Laboratories: Audit findings</p>	<p>In GB only laboratories approved by Defra can perform analyses within the SNCPs. In order to be approved a laboratory must be accredited to ISO 17025 by the United Kingdom Accreditation Service (UKAS) and must regularly participate in proficiency tests organised by AHVLA. Approval is renewed annually. The list of</p>	<p>In GB only laboratories approved by Defra <u>and the Devolved Governments</u> can perform analyses within the SNCPs. In order to be approved a laboratory must be accredited to ISO 17025 by the United Kingdom Accreditation Service (UKAS) and must regularly participate in proficiency tests organised by AHVLA. Approval is renewed annually. The list of approved laboratories is publicly available on <del>Defra</del> <u>the CAs'</u></p>	<p><b>Comment for factual correction and/or clarification:</b> Defra is responsible for approval of laboratories for testing SNCP samples in England and Wales while Scottish Government is responsible for approval of such laboratories in Scotland. The lists of approved laboratories are available on all the relevant CAs' websites.</p>

	approved laboratories is publicly available on Defra’s website. The audit team was informed by the CA that if a serious problem was detected (including suspension of ISO accreditation), Defra would remove the laboratory from the list.	websites. The audit team was informed by the CA that if a serious problem was detected (including suspension of ISO accreditation), <del>Defra</del> <u>the CA</u> would remove the laboratory from the list.	
<b>Page 12 - Section 5.8</b> Laboratories: Audit findings	According to the data received from the CA three laboratories (including the NRL) test official SNCP samples in GB and two in Northern Ireland.	According to the data received from the CA three laboratories (including the NRL) test official SNCP samples in GB and <u>one</u> <del>two</del> in Northern Ireland.	<b>Comment for factual correction and/or clarification:</b> An error was made in the information supplied in section 8.6 of the pre- audit questionnaire, where the laboratory head quarters as well as the testing facility were included in the laboratory list for Northern Ireland. There is only one designated official testing laboratory in Northern Ireland at the Agri-Food and Biosciences Institute (UKAS 2632) so text amendment suggested to correct this.
<b>Page 13 – Section 6</b> Overall conclusions	However, in the areas where official controls are delegated to ICBs, the system cannot provide guarantees to the CAs that the requirements related to the control programmes are properly implemented. This is mainly due to the unstructured nature of communication of results by control bodies to the CAs as well as to the absence of an auditing system on these control bodies.	However, in the areas where official controls are delegated to ICBs, the system cannot provide guarantees to the CAs that the requirements related to the control programmes are properly implemented <u>regarding verification of operator testing compliance</u> . This is mainly due to the unstructured nature of communication of results <u>of operator auditing</u> by control bodies to the CAs as well as to the absence of an auditing system on these control bodies.	<b>Comment for factual correction and/or clarification:</b> Suggested text for clarification (as per previous comments) to take account of the fact that the CA does have robust procedures in place for verification of completion of 100% of routine official sampling requirements to be carried out by the ICBs. However, there are shortfalls in verification of the other delegated official task involving verification of operator sampling compliance. It should also be noted that all laying chicken premises are inspected by AHVLA or Scottish Poultry Unit officials approximately annually, so verification of operator sampling compliance and ICB monitoring of this as a delegated official task, is adequately covered.