

Updated Action Plan received from the Competent Authority, 10 April 2013

New Action Plan Proposed by the Competent Authorities of Turkey to the recommendations of Report ref. DG (SANCO)/2012-6292 MR of an audit carried out from 09 to 16 October 2012 in order to assess the controls of aflatoxin contamination in hazelnuts and dried figs intended for export to the EU and to follow up on mission DG(SANCO)7858/2008				
DATE 05.04.2013				
N°	Recommendation	Action Plan Proposed by the Competent Authority (28 January 2013)		New Action Plan Proposed by the Competent Authority
1	Ensure that official controls on hazelnut and dried fig producers include verification of compliance with hygiene requirements at least equivalent to the requirements laid down in Annex I to Regulation (EC) No 852/2004.	<p>General hygiene rules have been specified in relation to primary production and related activities in the Regulation of Food Hygiene which was published on the Official Gazette No.28145 and dated 17.12.2011 and which is compliant with the Regulation No.852/2004. In accordance with Article 8 (4); the food business operators who produce or harvest plant products are responsible for taking sufficient measures for the following issues;</p> <p>a) Keeping the equipment, cans, containers, vehicles, vessels and boats clean and disinfecting them appropriately when necessary after cleaning.</p> <p>b) Ensuring that the cleaning of plant products and their production, transportation and storage conditions are hygienic in necessary circumstances.</p> <p>c) Using potable or clean water in order to avoid contamination when necessary.</p> <p>d) Avoiding animals and insects which cause the contamination.</p> <p>e) Storing the wastes and hazardous substances in a manner which avoids the contamination and processing them.</p> <p>f) Taking into account the results of the analyses which have been carried out on the samples taken from the plants or on other samples and which are significant for human health.</p> <p>g) Using the plant protection products and biocides as specified in the relevant legislation.</p> <p>In line with the provisions mentioned above (in Annex-1 of the Regulation No.852/2004), studies have been initiated for cooperation with engineers working within the scope of TARGEL project in order to verify the compliance with minimum technical hygienic conditions for food business operators who produce or harvest plant products laid down in the Regulation of Food Hygiene, published on the</p>		<p>General hygiene rules are specified in relation to primary production and related activities in the Regulation on Food Hygiene which was published on the Official Gazette No.28145 and dated 17.12.2011 and which is harmonized with the Regulation No.852/2004. In accordance with Article 8 (4); food business operators who produce or harvest plant products are responsible for taking sufficient measures to ensure the following;</p> <p>a) Keeping equipment, cans, containers, vehicles, vessels and boats clean and when necessary, disinfecting them appropriately after cleaning.</p> <p>b) Ensuring cleanliness of plant products and that their production, transportation and storage conditions are hygienic as necessary.</p> <p>c) Using potable or clean water in order to avoid contamination when necessary.</p> <p>d) Prevention of animals and insects which cause contamination.</p> <p>e) Storing and processing waste and hazardous substances in a manner which avoids contamination.</p> <p>f) Taking into account the results with significant human health implications of analyses which have been carried out on samples taken from plants or on other samples.</p> <p>g) Using plant protection products and biocides in the manner specified in the relevant legislation.</p> <p>In line with the provisions mentioned above, studies will have been initiated for cooperation with engineers working within the scope of TARGEL project in order to verify the compliance with minimum technical hygienic conditions for food business operators who produce or harvest plant products laid down in the Regulation of Food Hygiene, published on the Official Gazette No.28145 dated 17.12.2011, during official controls for producers of dried figs and nuts (in Annex-1 of the Regulation No.852/2004).</p> <p>Within the scope of the plan to be prepared by Provincial and District Directorates and under the supervision of the personnel of directorates, training and inspection programme will be initiated in primary production during the primary production period (June – July – August – September) in our country by ensuring the efficient participation of agricultural consultants employed in villages within provincial/district directorates. This programme aims to train and inspect farmers working in the provinces where production activities have been performed within 2 years.</p>

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		Official Gazette No.28145 dated 17.12.2011, during the official controls for the producers of dried figs and nuts.		
2	Ensure that hazelnuts and dried figs intended for export to the EU comply with the relevant requirements of food law, as laid down in Article 11 of Regulation (EC) No 178/2002, or their equivalents, and do not contain aflatoxins at levels exceeding those set in Article 1 of Regulation (EC) No 1881/2006, as amended.	<p>The following practices will be carried out by our Ministry concerning the recommendation No.2;</p> <p>a) An in-service training program which contains the conditions to be adapted during the preparation of the Health Certificate for the export of our dried fruits (figs, nuts and certain products derived from them) from Turkey to the EU will be organized with the participation of the relevant personnel from the Central Organization of our Ministry and from Provincial Directorates.</p> <p>b) An in-service training program will be organized with the participation of the relevant personnel from the Central Organization of our Ministry and from Provincial Directorates, for the purpose of ensuring unity in the preparation of certificates in line with the export controls within the scope of “the Implementing Regulation on the Preparation of Health Certificates for Plant Food and Feed and on the Products Returned from the Export” and with the demands of the exporting country, in sampling and result analyses and in the implementation of the Regulation.</p> <p>c) Implementing Instruction No.031792 on Health Certificates for the Export of Dried Fruits to the European Community, a copy of which has been provided to the FVO mission, will be published after its reissue within the scope of the recommendations of the FVO mission team.</p>		<p>The following practices will be carried out by our Ministry concerning the recommendation No.2;</p> <p>a) An in-service training program covering the conditions to be complied with during the issue of the Health Certificate for the export of our dried fruits (figs, nuts and certain products derived from them) from Turkey to the EU will be organized with the participation of the relevant personnel from the <i>Central Organization</i> and <i>Provincial Directorates</i> of our Ministry. Within the scope of this in-service training program which covers information related to the export procedure renewed by the Central Authority and the conditions to be adopted during the issue of the Health Certificate for export, 31 provincial directorates authorised for the export of dried fruits from Turkey to EU will be trained between the dates of June 2013 and September 2013. The trainings will be practical and theoretical.</p> <p>b) An in-service training program will be organized (especially during pre-export periods) with the participation of the relevant personnel from the <i>Central Organization</i> and from <i>Provincial Directorates</i> of our Ministry, for the purpose of ensuring unity in the issue of certificates in line with export controls within the scope of the “Implementing Regulation on the Issue of Health Certificates for Plant Food and Feed and on the Products Returned from the Export” and with the demands of the exporting country, in sampling and analysis results and in the implementation of the Regulation. In June 2013 and September 2013, trainings will be held with the participation of personnel of the authorized provincial directorate, private and public laboratories authorized for export in the provinces from which figs and nuts will be exported by the Central Authority. The trainings will be practical and theoretical.</p> <p>c) “Control Procedure for Export to the EU Countries”, a copy of which was given to FVO mission team during the audit, will be published upon its reorganization within the scope of the recommendations of the FVO mission team. Before this reorganization, in line with the advices of the FVO mission team, a guideline which involves matters such as the physical control of batches subject to export, sampling, analysis and reporting and assessment of the results and issue of certificates regarding the export of the dried fruit to EU was sent to the 31 authorized provincial directorates on 19.03.2013.</p>
3	Ensure that the deficiencies noted with regard to the analytical reports and the estimation	<p>The following practices will be scheduled and completed by our Ministry for the third recommendation until the end of 2013.</p> <p>a) An in-service training program will be organized on the subject of Sampling Methods for Mycotoxin (especially before the start of the export period) in order to ensure that the declaration No. 2011/32 which sets out the conditions</p>		<p>The following practices will be scheduled and completed by our Ministry for the third recommendation until the end of 2013.</p> <p>a) An in-service training program will be organized on the subject of Sampling Methods for Mycotoxin (especially before the start of the export period) in order to ensure that the Communiqué No. 2011/32 laying down conditions for sampling for aflatoxin in nuts and figs and which is fully harmonized with the EU Directive No. 401/2006/EC.</p> <p>b) A workshop was organized on 22-23 January 2013 with the participation of experts from 8</p>

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<p>of the measurement uncertainty are rectified to ensure that the performance criteria established in Regulation (EC) No 401/2006 are met.</p>	<p>for sampling for aflatoxin in nuts and figs and which is fully compliant to the EU Directive No. 401/2006/EC.</p> <p>b) A workshop will be organized on 22-23 January 2013 with the participation of the experts from 8 laboratories in order to ensure the compliance with the Directive No.401/2006/EC regarding the reporting format and to ensure the association of all laboratories in the country. In order to implement the workshop decisions in the whole country, training programs will be formulated within a program for 2013 (e.g. for calculating the measurement uncertainty) and it will be ensured that the personnel of private and public laboratories participate in the trainings.</p> <p>c) The National Food Reference Laboratory cannot perform its organizational duties due to the current lack of infrastructure with relation to proficiency testing. Therefore, Ankara Food Control Laboratory, the infrastructure of which is more convenient, will perform this duty until the National Food Reference Laboratory is ready.</p>		<p>laboratories in order to ensure compliance with the Directive No. 401/2006/EC regarding the reporting format and to ensure the togetherness of all laboratories in the country. In order to implement the workshop decisions in the whole country, training programs will be formulated within a program for 2013 (e.g. for calculating the measurement uncertainty) and it will be ensured that the personnel of private and public laboratories participate in the trainings. The National Food Reference Laboratory cannot perform its duty of organizing Proficiency Testing due to the current lack of infrastructure. Therefore, Ankara Food Control Laboratory, the infrastructure of which is more convenient, will perform this duty until the National Food Reference Laboratory is ready. Within the scope of the FVO mission between the dates October 9 – 16, the purpose of evaluation of the control of the aflatoxin contamination in the nuts and dried figs intended to be exported to EU and following-up the mission DG (SANCO) No. 7858/2008 and for the purpose of correcting the deficiencies specified related to the analytical reports and the estimation of the measurement uncertainty, in order to ensure that the performance criteria are met in our country, it was decided to provide training on the validation of analysis method, calculation of measurement uncertainty for aflatoxin in nuts and dried figs which have a significant place in our countries' export and for the preparatory works of the training in question, our Laboratory Directorate held a preliminary meeting in our Directorate General on February 19, 2013 with the participation of the subject matter experts. In accordance with the decisions made as a result of this meeting, it was planned to provide a "Training on Method Validation and Measurement Uncertainty for Aflatoxin" by expert personnel of our Ministry on March 25-26-27 and April 03-04-05 to Food Control Laboratory Directorates under our Ministry and Private Food Control Laboratories which carry out aflatoxin analysis. The training was initiated in the course of the preparation of this report.</p>
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