

ANNEX

Response of the Competent Authorities of Switzerland to the recommendations of Report ref. DG(SANCO)/2013-6888 -MR of an audit carried out from 15 October 2013 to 25 October 2013 in order to evaluate the food safety control system in relation to raw milk and dairy products under the auspices of the Agreement between the European Community and the Swiss Confederation on trade in agriculture products.

General comment:

The two main CCA responsible for the controls over the dairy sector, the Food Safety Division of the FOPH and the SFVO have been merged to the Federal Food Safety and Veterinary Office FSVO from 1 January 2014. Consequently the cooperation between the FSVO and the CA has to be reestablished and will be discussed during this year.

N°	Recommendation	Action Proposed by the Competent Authority
1	To ensure that the official controls cover potable water, and that potable water complies with microbiological criteria, physical and chemical as required in Article 17 and Annex B of the Ordinance on Hygiene (817.024.1), Ordinance on Potable, Spring and Mineral Water (SR 817.022.102), and Ordinance on Impurities and Ingredients in Foods (817.021.23). Furthermore, to ensure that the complete analysis of potable water from waterworks are available for the food business operators, as required in Article 5 of the Ordinance on Potable, Spring and Mineral Water.	In accordance with legal requirements, municipal drinking water is analysed at least annually for microbiological, physical and chemical criteria by the CCA. Results of the analysis can be consulted at any time on the site " Trinkwasserqualität in der Schweiz ". In the framework of the upcoming coordination meeting in March 2014 Cantonal Food Safety Authorities (CA) will be instructed to ensure that the control of the documentation of water analysis (cantonal and company results) is checked during inspections.
2	To ensure that the food business operators' systems in place for the control of raw milk and colostrum cover also raw milk of sheep and goat and that the official controls of dairy establishments, collection centres and dairy holdings, as required by Article 56 of the Food Ordinance (817.02), the Enforcement Ordinance in relation to Food Legislation (817.025.21) and the Ordinance of Co-ordination of Controls on Agricultural Holdings (910.15), respectively, cover also raw milk quality control.	The call for tenders for the mandate of the official control of raw milk for the period 2015-2018 encompasses the control of raw milk of sheep, goat and buffalo. The raw milk of these species will be submitted to the same official control system as cow milk by mid 2015. In 2014 the CCA is going to start discussions with the Swiss cheesemakers association Fromarte, to amend the guidance document with requirements for the control of milk from sheep, goat and buffalo. The recommendation that official controls of dairy establishments, collection centres and dairy holdings should cover raw milk quality control can only partially be answered (see our comment on point 5.6.2 of the report). Raw milk quality control in dairy establishment is part of the FBO mandatory self-control system. To improve official controls of FBO mandatory self-control, the CA shall be instructed in March 2014 and will be trained in 2015.

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N°	Recommendation	Action Proposed by the Competent Authority
3	To ensure that the food business operators' Hazard Analysis Critical Control Points-based systems are in line with the requirements of Article 51 of the Food Ordinance ((817.2), to ensure that the official controls on Hazard Analysis Critical Control Points-based procedures are effective and that their effectiveness is evaluated, as required in Article 56 of the Enforcement Ordinance in relation to Food Legislation (817.025.21).	In accordance with the Food Ordinance and the Enforcement Ordinance the FBO have to provide documentation on an implemented HACCP system to the CA. The relevant Ordinances will be revised in 2015 as a results of revision of the Swiss Food Law (still in discussion in the Parliament). A common approach between CA and CCA to coordinate enforcement measures will be effective from 31 December 2016 with a systematic registration of follow-up actions. Meanwhile the effectiveness of official controls is evaluated in the context of the FFCU audits. The results of the audit program concerning the implementation of national food legislation regarding imports will be discussed in 2014 with the CA. To improve official controls of FBO mandatory self-control, the CA shall be instructed in March 2014 and will be trained in 2015.
4	To ensure that animal by-products in dairy establishments are subject to an adequate control system, including their collection and identification, as required in Article 16 of the Ordinance on Hygiene (817.024.1) and in Article 4.4. of Regulation (EC) 1069/2009.	Until mid 2014, the cantonal enforcement authorities will be instructed by an information letter on the implementation of the provisions of the Ordinance on animal by-products to improve the identification of containers used for animal by-products.
5	To ensure that the official controls on food safety and process hygiene criteria are effective and cover the verification of the compliance of the food business operators with the rules and criteria of Article 5, Chapter 5a and Annexes 1-3 of the Hygiene Ordinance (817.024.1).	FBO have to take adequate measures in order to ensure the self control of food safety and process hygiene criteria. The effectiveness of official controls on food safety and process hygiene shall be reviewed in 2014 and where necessarily requirements redefined during the discussion concerning the collaboration of the new CCA with CA.