


Comments on the draft report DG(SANCO)/2013-6888 – MR Draft

Report Nr	Page Nr	Original text	Proposed correction	Comment
1	1	the FVO audit team was accompanied throughout the audit by a representative from the Central Competent Authorities (CCAs), the Swiss Federal Veterinary Office (SFVO), the Federal Office of Public Health (FOPH) and the Federal Food Chain Unit (FFCU)	the FVO audit team was accompanied throughout the audit by representatives from the Central Competent Authorities (CCAs), the Swiss Federal Veterinary Office (SFVO), the Federal Office of Public Health (FOPH) or the Federal Food Chain Unit (FFCU)	
2	1	Table: the establishments visited were located in 5 cantons (Bern, Fribourg, Solothurn, Zug and "Urkantone" (Schwyz and Nidwalden)	The establishments visited were located in 5 cantons (Bern, Fribourg, Solothurn, Zug and "Urkantone" (Uri and Nidwalden)	
5.2.1	5	It is foreseen that the the two main central CAs responsible for the controls over the dairy sector, namely the Food Safety Division of the FOPH and the SFVO will merge on 1 January 2014. Further information can also be found in the Multi-Annual National Control Plan (MANCP) of Switzerland which can be found at: http://www.bvet.admin.ch/blk/02557/index.html?lang=en .	It is foreseen that the two main central CAs responsible for the controls over the dairy sector, namely the Food Safety Division of the FOPH and the SFVO will merge on 1 January 2014. Further information can also be found in the Multi-Annual National Control Plan (MANCP) of Switzerland which can be found at: www.mancp.ch .	
5.2.1	5	It its response to recommendation no 1 of the report 2009-8217 ...	In its response to recommendation no 1 of the report 2009-8217 ...	
5.2.4	8	The swiss legislation provides for different levels of enforcement, namely oral advice, written warning, orders (Verhütung) and initiating a court case.	The Swiss legislation provides for different levels of enforcement, namely oral advice, written warning, orders (Verfügung) and initiating a court case.	
5.5.2	14	The general obligation for the FBOs to carry out own checks is laid down in Article 23 of the Food Act.	The general obligation for the FBOs [Food Business Operators] to carry out own checks is laid down in Article 23 of the Food Law.	On page 2 of the report, Federal Act on Foodstuffs and Consumer Products is abbreviated as Food Law
5.6.2 + 8	22 + 26	The CA in the cantons visited did not include the verification of the raw milk control system in their controls of dairy holdings, collection centres and dairy	The CA in the cantons visited did not include the verification of the raw milk control system in their controls of dairy establishments.	In accordance with Art. 6 of the Ordinance on Hygiene in Primary Production (916.351.021.1) raw bovine milk quality is at least monthly controlled and results are kept

		establishments.		<p>for a period of three years. The verification of results is done during the official control of the dairy holdings (see point MHy 01, page 19 of annexed document).</p>  <p>2013_01_10_TW_Ko ntrollen+ink+allen+k</p> <p>Results of raw milk control in centres which collect milk from many holders are inconclusive due to the high number of suppliers. For this reason there is no implementation of raw milk control system for collection centres.</p>
6	25	However, the CCA took immediate action and withdraw the approval of the FBO.	However, the CA took immediate action and withdraw the approval of the FBO.	As written in the summary (page I), it's the Competent Authority which took immediate action.
8	26	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.	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 20 and 38 of the Ordinance on Animal By-products (916.441.22).	Articles 20 and 38 of the Swiss Ordinance on Animal By-products are equivalent to Article 4.4 of the EU Regulation 1069/2009.
8	26	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).	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 58a, Chapter 5a and Annexes 1-3 of the Hygiene Ordinance (817.024.1).	Chapter 5a include only articles 58 a - f.