## 初方对报告草案的评议意见（中英文对照）

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<td>1</td>
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<td>Most of the sheep and goat casings are imported from Australia and New Zealand. The FVO audit team was informed that most of the sheep and goat raw materials are received in the form of frozen intestines and that 1,000 kg of frozen intestines would produce 150 kg of casings (15%). 大部分的绵羊或者山羊的肠衣从澳大利亚和新西兰进口，欧盟食品办公室审核小组被告知大部分绵羊或者山羊的原料是冷冻原肠的形式，1000kg 冷冻原肠可以生产 150kg 肠衣。</td>
<td>日前，中方仅允许进口冷冻肠衣和盐渍肠衣，原肠是禁止进口的。此处，实际应为冷冻肠衣，欧方有关冷冻原肠的说法实属误解。At present, Chinese competent authority only allows importing frozen casings and salted casings, frozen intestines imports are banned. The statement of frozen intestines from EU side is not correct; actually it should be frozen casings, so there is misunderstanding from EU.</td>
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<td>The FVO audit team also requested data regarding the volume of Chinese raw materials used for the production of casings but this information was not provided by the AQSIQ. 欧盟食品办公室工作人员根据中国原料的使用情况表中无数据，此数据，国家质检总局并没有提供。</td>
<td>针对欧方在 2013 年提供给中方的考察前问卷（Ref.Ares(2013)3004973-0609/2013），中方已在 2013 年 11 月 4 日《关于欧盟考察员使用肠衣及残留监控有关事宜的回复》中提供了有关数据。该数据为 EU 现场考察过程中提出的。现将有关数据提供如下：2011 年 1 月 1 日至 2013 年 9 月 30 日，猪肉肠衣原料共 97554 吨；绵羊/山羊肠衣原料共 28090 吨；总计 125644 吨。In terms of the pre-audit questionnaire provided to China in 2013 （Ref.Ares(2013)3004973-0609/2013）, Chinese competent authority has already provided all data in “letter to the EU examination about rabbit meat, casings and residues monitoring issues” dated November 4th 2013. This data was raised during the site visit, Now we...</td>
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present the following data supplement: from January 1, 2011 to September 30, 2013, total volume of Chinese hog raw material is 97554 tons; total volume of sheep/goat Chinese raw material is 28090 tons. A total of 125644 tons.

In their action plan the CCA stated that the list of casing establishments and rabbit slaughterhouses are kept up to date and communicated to the Commission three times per year as required by Article.

However, when checking the most recent list of EU approved rabbit slaughterhouses in one province visited it was disclosed that only 7 of the 11 establishments listed for the slaughter and processing of rabbit meat in this province were in operation and exporting rabbit meat to the EU. The most recent list was published 30 December 2011 and valid as of 12 January 2012.

According to regulations of China, the export licence of establishments without any exporting activities during a two-year period will be automatically withdrawn which means that there will be no export to any countries including EU members. CNCA has received the application for withdrawing export qualifications of 3 rabbit meat establishments from Shandong CIQ, and will send to EU after going through all CNCA's internal processes. An error occurred when submitted the information of the 4th establishment. (see 5.3 for details).

One of these establishments had wrongly been listed as a slaughterhouse, cutting...
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In four other provinces visited the EU lists had been kept up to date and no errors were identified. Some EU listed casing establishments did not have any exports to the EU during the past three years for commercial reasons but they were in activity and exported to other markets and their eligibility for export to the EU...
was therefore maintained and verified by the CA. It was explained that establishments without any export activities during a two year period would automatically have their export licence withdrawn.

In all establishments visited, the casings received, either imported or from Chinese origin and the processed casings ready for dispatch, were properly packed and labelled or identified. However, in one establishment processing salted casings of Chinese origin the traceability could only be documented back to the previous owner, which could also be a dealer.

In one of the establishments processing casings of Chinese origin only, the tracing could only be done to the previous supplier. The slaughterhouses could not be identified.

According to the animal quarantine certificate issued by Chinese agricultural agencies, Chinese Competent Authority believes that tracing back to the slaughterhouse
The CIQ stated that ante-mortem and post-mortem inspections are not part of their responsibility although under point II.1.c of the export certificate the signing OV from the CIQ in relation to the consignment declares that “it has been found fit for human consumption after ante-mortem and post-mortem inspections.” No evidence was seen of any CIQ verification of the performances of the OV in relation to ante-mortem and post-mortem inspections.

In all cases checked by the FVO audit team the certification procedures related to farmed rabbit meat and casings, as foreseen in the Chinese instruction, was complied with. However, the FVO auditors noticed that the certifying officers from the CIQ signed export certificates for rabbit meat without any verification of the performance of the staff carrying out ante-mortem and post-mortem inspections.

Certifying officers sign export certificates for rabbit meat without having any personal knowledge regarding ante-mortem and post-mortem inspections, which is not in line with the requirements of Council Directive 96/93/EC, Article 3 (2). There must be some misunderstanding of FVO on the functional responsibilities between MOA and AQSIQ. According to the individual functional responsibilities, the veterinary competent authorities under MOA are in charge of ante-mortem and post-mortem inspections and CIQ is to control the whole process which includes...
to verify the ante-mortem and post-mortem inspections and it is not true that CIQ does not supervise this process. The official veterinarian from CIQ will make spot checking at random to the Animal quarantine certificate issued by official veterinarian from MOA in order to verify the effectiveness of quarantine of the rabbits in registered farms. Meanwhile, official veterinarian from CIQ will re-inspect rabbit or carcass or rabbit viscera at random which were checked in the ante-mortem and post-mortem inspection by the official veterinarian from MOA. Furthermore the official veterinarian from CIQ will check the records done by official veterinarian from MOA. If there are noncompliance in the ante-mortem and post-mortem inspection, CIQ veterinarian and veterinarian from MOA will discuss and communicate on site and settle the problems. Because there is communication between the veterinarians from CIQ and MOA, it is true that the CIQ veterinarian supervise the whole process of ante-mortem and post-mortem inspection. Upon the fact of that the CIQ veterinarian supervise the whole process of ante-mortem and post-mortem inspection, it is not proper for EU auditor to conclude that it is not legal for CIQ to sign the certificate according to the EEC Directive 96/93/EC, i.e. Article...
Some deficiencies in regard to the stunning of rabbits were seen mainly in one slaughterhouse visited, i.e. cornea reflex, agitation, gasping and partly recovering before death by bleeding. The area was very dark, with no possibility of turning on the light making it impossible to verify the efficiency of the stunning.

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3(2) "the certificating signature veterinarian can not prove the unknown data or the unsure contents " of "certificating rules to animal and animal products".

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This problem has been explained to the FVO audit team on site, the case is as following: during audit on the spot, the FVO auditor found an official record indicating some stunning inefficiency occurred, but no records created by establishment indicating the inefficiency of stunning on the same day. The truth is that the problem had been identified by the establishment and recorded in an early time, which is not included in the files checked by FVO auditors. At the same time, Chinese side explained to the FVO on the new stunning equipment. Since the inefficiency of stunning was identified, the establishment has bought and installed a new machine from EU, which was told to meet the EU new requirements. But due to the reoccurrence of the same problem, we are waiting for the technicians from EU to re-adjust it. So the stunning equipment found by
The FBO and CIQ were aware of the new Regulation (EC) No 1099/2009 and training had been organised in October 2013 at Provincial level for CIQ staff and two staff from each rabbit slaughterhouse. However the implementation of Chapter 2, Article 5, Point 1 concerning the checks on stunning is not complied with: the FBOs are not carrying out these checks on a sufficiently representative sample of animals (only check 10 animals every 2 hours).

CIQ 1099/2009 Tritst 2013

FVO on the spot is the old one and it is not the case, FVO thought, that the new equipment has not been installed.

由于1099/2009规定兔子的麻电没有设置参数，而且没有确定官方或者企业对麻电效果进行验证时的抽样数量，因此中方的麻电验证工作是根据企业的实际生产情况进行抽样频率执行的，中方现场也曾询问过 FVO 官员是否需要确定具体验证数量，检查官表示欧盟也没有统一的要求。

中方将接受欧方的建议，对麻电操作进行验证，每 2 小时验证一次，每次验证要检查不少于 20 只兔子。同时，在监管过程中，会根据各企业麻电效果情况不同，要求企业对麻电效果检验的抽样数量进行调整，指导企业做好麻电效果的验证工作，并对麻电效果验证时抽取的兔子进行规范，尽量选取个体较大、皮毛较厚或有其他影响麻电效果情况的兔子，保证样本的代表性。

Due to no specific parameters set for stunning of rabbit and also no sample size required to be taken by officer or establishment to verify the stunning effect in 1099/2009/EC, China determine the sample frequency based on the actual production of the establishment. On the spot Chinese side also asked FVO the recommended sample size, but the auditor of FVO indicated that no specific requirement on how many rabbit should be sampled to verify the effect of stunning in EU.
The transport document issued by the MoA for the semi-finished casings covering the transport from a slaughterhouse or from a non-EU approved casing establishment to this document do not include any guarantee or certification from the slaughterhouse of origin. Therefore, the BSE statement included on export certificates for ovine casings of Chinese origin was not supported by any guarantee or certification from the slaughterhouse of origin. Therefore, the BSE statement included on export certificates for ovine casings of Chinese origin was not supported by any guarantee or certification from the slaughterhouse of origin. Therefore, the BSE statement included on export certificates for ovine casings of Chinese origin was not supported by any guarantee or certification from the slaughterhouse of origin. Therefore, the BSE statement included on export certificates for ovine casings of Chinese origin was not supported by any guarantee or certification from the slaughterhouse of origin.
According to the "animal quarantine law", the veterinary competent authorities under MOA issued the animal quarantine certificate for semi-finished casings after quarantine inspection with eligible results. The content of certificate is relatively simple, which did not include the EU concerned slaughterhouse information and removing sheep casings risk materials etc, so the EU concludes that this does not conform to the relevant provisions. However, Chinese side has taken effective measures to ensure that products conform to the EU requirements. First, management of the raw material inspection and acceptance by establishments processing export casings. In the traditional sheep casings processing techniques, because ileum have no practical use value, it have been removed in previous procedure, while receiving raw materials, establishments strengthen inspection on this aspect. Second, C&Q verify establishment's implementation of receiving raw materials in the process of supervision, verifying whether ileum have been removed or not by running water, so as to prove that casings products for export have been removed risk materials. Third, AQSIQ has carried out trainings on how to remove risk materials from sheep casings, mainly introduced casings processing HACCP guidelines defined by European natural casing organizations. Chinese side...
believes that through the implementation of these measures, we could ensure that casings exporting to EU conform to the EU requirements.