中方对报告草案的评议意见（中英文对照）

序号 No.	报告章节 Chapter	报告内容 Content	中方评议意见 Comments from the Chinese side
1	4	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。	目前，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.
2	4	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. 欧盟食品和兽医办公室考察团需要生产肠衣所用的中国原料的数量，但是这个数据，国家质检总局并没有提供。	针对欧方在 2013 年提供给中方的考察前问卷（Ref.Ares(2013)3004973-06/09/2013），中方已在 2013 年 11 月 4 日《关于欧盟来华考察兔肉肠衣及残留监控有关事的复函》中提供了全部数据。该数据为 FVO 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)3004973-06/09/2013）,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

			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.
4	5.3	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. 在中方的行动计划中，中央主管机关声明按照欧盟规定，保持中国出口欧盟肠衣企业和兔子屠宰场名单及时更新，每年向欧盟通报 3 次名单。	无意见。 No comments.
5	5.3	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. 但是，在一个省里，检查最新的欧盟批准的兔子屠宰场名单时， 11 个公开的屠宰和生产兔肉并出口到欧盟的企业，只有 7 个依然在生产和出口兔产品到欧盟，最新的名单是 2011 年 12 月 30 日公布的，生效日是 2012 年 1 月 12 日。	根据中方规定，出口食品企业 2 年内未出口食品到任何国家的，中方将注销其出口备案资格，而非仅是欧盟国家。认监委目前已收到山东 CIQ 报送的取消 3 家兔肉企业注册资格的申请，待审核后将报送欧方。另外一家兔肉企业属于信息报送错误，详见 5.3。 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).
6	5.3	One of these establishments had wrongly been listed as a slaughterhouse, cutting	该企业属于信息报送错误，认监委已于 2014 年 1 月发

		plant and cold store for rabbit meat although this was only an establishment producing meat product from rabbit meat. The incorrect listing had been requested by the CCA in January 2011 and the mistake had not been discovered by the CA at provincial level (CIQ) when requesting the EU listing for meat products six months later or during later verification of the approval conditions and eligibility for export. 这些企业中，有一个企业被错误的列入屠宰场、分割企业和冷库的列表，尽管它实际只是一个生产兔肉产品的企业。中央主管机关 2011 年 1 月拿到的这份错误的清单，但在 6 个月之后或时间更加往后的验证该企业的出口条件和资格时，被要求出具清单的省级的 CIQ 并没有发现这个错误。	送 NO.66(2013) 文件向欧盟更新并说明。中方将采取相应预防控制措施，加强信息报送的准确性。 An error occurred when submitted the information of this establishment. CNCA submitted a document (No.66 (2013)) to amend and explain this issue in January 2014. CNCA will take preventive measures to ensure the accuracy of submitted information.
7	5.3	In the same province it was also disclosed that three of the nine casings establishments listed for exports to the EU had no export activities and therefore should be de-listed. 在该省份，也发现有批准名单上 9 家肠衣企业中的 3 家肠衣企业没有任何出口业务，应该在名单上剔除。	由于中国肠衣企业申请欧盟注册被暂停，中方误解肠衣更新二作均不能运行，经过此次欧方专家总结会上的说明，中方已清楚了解，并正在进行调查改进。中方拟于近期向欧盟通报一份完整的最新中国肠衣企业注册总名单和一份新著向欧盟申请注册的肠衣企业名单。 The registration of Chinese casing establishments exporting to EU was suspended. CNCA thinks that no casing establishments can be recommended to EU. After the explaining of EU experts during the closing meeting, CNCA fully understood this issue. CNCA plans to submit an updated list of casing establishments and a list of new casing establishments of exporting to EU soon.
8	5.3	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	中方拟于近期向欧盟通报一份完整的最新中国肠衣企业注册总名单。 CNCA plans to submit an updated list of casing establishments soon.

		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. 在其他 4 个省份（考察组）查看的允许出口欧盟企业名单保持了及时更新，没有发现错误。一些名单上的肠衣企业，由于商业上的原因，过去的三年里没有出口产品到欧盟，但是他们出口产品到其他的市场，他们的出口欧盟的资格被主管当局许可。CIQ 解释是根据相关规定若企业在过去 2 年里没有任何出口业务，将会取消出口资格。	
9	5.4.4	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. 在所有考察的企业中，无论是接收的进口肠衣，还是中国原产的肠衣，以及加工好待出口的肠衣，都已经规范地包装好并贴好标签或被标识。但是，在 1 家处理中国源产盐渍肠衣的企业中，企业的追溯系统只能追回到上一个原料供应商，其可能也是一个经销商。	在出口肠衣加工企业，原料是可以追溯的。如原料是原肠，可以溯源到屠宰场；如果是半成品原料，则可以溯源到半成品加工企业或经销商，如果要进一步溯源到屠宰场，在出口肠衣加工企业是看不到半成品加工企业或经销商之前的溯源记录的。根据农业部门出具的动物检疫合格证明，中方认为溯源到屠宰场是能做到的。 In establishments processing export casings, raw materials traceability is available. If the raw materials are green runners, it can be traced back to slaughterhouse; If the raw materials are semi-finished materials, it can be traced back to semi-finished products processing establishments or dealers, if there is need to trace back to slaughterhouse, traceability records prior to semi-finished products processing establishments or dealers is not available in establishments processing export casings. According to the animal quarantine certificate issued by Chinese agricultural agencies, Chinese Competent Authority believes that tracing back to the slaughterhouse
	5.4.4	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. 在一个只处理中国产肠衣的企业中，只能追溯到前面的供应商。无法追溯屠宰企业。	

			is capable.
10	5.4.6	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. CIQ 声明宰前和宰后检验不是他们工作的职责，虽然需要官方兽医签署的兽医卫生证书中第二点第一条声明"经过宰前宰后检验证明适合人类食用..."。没有证据表明 CIQ 对农业部门兽医执行宰前宰后检验的有关情况进行验证。	此处为欧方对 MOA 和 AQSIQ 两方工作关系的误解。根据部门职责分工，农业兽医主管部门负责宰前宰后检验；检验检疫部门负责全过程监管，包括对宰前宰后检验的验证工作，并非 CIQ 部门不对此项工作进行控制。CIQ 兽医主要工作是：CIQ 官方兽医会随机抽查活兔进入屠宰场时随附的农业部门官方兽医签发的动物检疫合格证明，以验证活兔产地检疫的有效性。同时，CIQ 官方兽医还会不定期随机对农业部门官方兽医宰前宰后检验后的兔或兔屠体、兔内脏再次进行检验验证。另外，CIQ 官方兽医还会对农业部门官方兽医的检验记录进行审核检查。当宰前检验和宰后检验出现不满意情况时，CIQ 兽医会与农业部门兽医进行现场沟通与交流，解决存在的问题，双方有现场信息沟通交流的机制，所以，CIQ 在全过程监管中，已经掌握了宰前宰后检验的情况。因而，欧方依据 96/93/EC 法规，即《动物和动物产品签证规范》Article 3 (2)规定"签字人员不能证明他们不了解的数据或他们不能确认的内容"否定 CIQ 兽医签证证明有关宰前宰后检验有关工作的合法性是不正确的。 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
	5.5	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. 在所有 FVO 考察团检查的涉及养殖兔肉和肠衣的证书出具的流程中，证书的出具符合中国的要求。但是，考察员注意到来自 CIQ 的签署兔肉出口证书的出证官员缺少宰前宰后检验的验证。	
	5.5	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). 签署出口兔肉证书的 CIQ 官员，没有任何关于宰前宰后检疫的相关知识，与欧盟指令 96/93/EC, Article 3 (2), 不相符合。	

			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 certification 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 are communication between the veterinarians from CIQ and MOA, it is true that the CIQ know the results of ante-mortem and post-mortem inspection during his control of the whole processing. 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

			3(2) "the certificating signature veterinarian can not prove the unknown data or the unsure contents " of "certificating rules to animal and animal products".
11	5.4.8	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. 在考察过的一个屠宰企业中看到了一些关于麻电兔子不充分的一些问题，例如：角膜反射、骚乱、痉挛及在放血前有部分苏醒，这部分区域光线较暗，无法开灯，也就无法确认麻电是否充分。	在现场检查时，确实存在很少量的兔子在放血时苏醒的情况，原因是兔子个体大小有差异，在规定的麻电电压条件下，体重大的兔子会存在麻电不充分的情况。企业将通过适当提高麻电电压和延长麻电时间的方式加强改进。关于工厂放血间无法开灯验证麻电效果问题，已在现场向 FVO 进行了解释，实属个例（偶发事件），企业已经针对该问题加强了管理，确保灯光正常使用。 After stunning, few rabbits indeed recovered from unconsciousness on the spot during slitting, due to inefficiency of stunning for the rabbits with heavy weights compared to other small one under the same fixed voltage. The slaughterhouse will improve the stunning effect by increasing stunning voltage and time of stunning. As for the failure of turning on the lights in bleeding room to check the effect of stunning, we have explained it to the auditors on the spot. it is really occasional event and the establishment has taken strong measures to ensure the proper work of lights in bleeding room.
12	5.4.8	In the second slaughterhouse, the OV had identified some deficiencies but the FBO had never noted any deficiencies during their own supervision. New equipment had been ordered at the request of the CIQ but had not yet been installed.	此问题现场已经向 FVO 做出了解释。现场具体情况如下：欧盟 FVO 官员检查时看到的一份官方记录中记录了企业存在麻电不充分的问题，但是同一天企业的自控记录没有体现麻电不充分的内容。实际上企业也已发现了

		在另一个屠宰企业，官方兽医已经发现了麻电不充分的问题，但是企业记录显示他们没有发现自身在麻电控制过程中存在麻电不充分的任何问题。CIQ 已经要求他们购买使用新的符合要求的麻电设备，但是企业购买的设备还没有安装。	车间内存在麻电不充分的问题，只是发现的时间早于官方发现的时间，记录的时间也早于官方记录的时间，不在 FVO 查看的记录中。同时，中方也就新麻电设备使用的问题向 FVO 作了说明：为解决麻电不充分问题，企业从发现问题开始，即从欧盟新购买了标明符合 1099/2009 法规要求的麻电设备，并进行了安装调试。但是，由于新设备麻电效果依然无法达到要求，需等待欧盟设备供应商派技术人员现场调试达到要求后再次使用，因此，在检查期间暂时使用的是旧的设备，而并非欧方认为的还未安装。 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

			FVO on the spot is the old one and it is not the case, FVO thought, that the new equipment has not been installed.
13	5.4.8	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). 企业和 CIQ 已经关注到新的欧盟法规 1099/2009 并且在 2013 年 10 月份省级 CIQ 部门已经组织过 CIQ 官方人员和两个兔肉企业的职工进行了培训。但是法规中第二节，第五章，要点 1 中麻电时的效果核实没有被有效执行，企业没有在麻电时检查足够多的有代表性的动物样品验证麻电效果（仅每 2 个小时检查 10 只兔子验证麻电效果）	由于 1099/2009 法规对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确定抽样频率执行的。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只进行规范，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只，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.

			Chinese side will take the advice from EU that the effect of stunning shall be verified once per 2 hours and no less than 20 rabbits taken in each verification. meanwhile, during the supervision of the establishments, Chinese side will direct the establishments on the verification and require the establishment to adapt the sample size based on the effect of stunning meanwhile to ensure the representativeness of samples, the rabbit with big size, thick hair or other features affecting the stunning shall be sampled on priority.
14	5.5	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 (nationally registered or approved) states only that the products covered by this document do "comply". It does not provide the guarantee that these products are produced in a nationally approved slaughterhouse or establishment, and does not include additional guarantees needed for the certification of sheep casings. 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.农业部签发的半成品的肠衣的涵盖从屠宰场或是从非欧盟注册的肠衣公司的运输单据只是声明涵盖的这些产品"遵从"。它不能保证这些产品是从国内认可的屠宰场或是公司生产的，并且也不额外包括需要的羊肠衣的证明文件。所以，包括原产中国绵羊肠衣的出口证书在内的疯牛病声明不被任何保证或是来自原产屠宰场的证书所支持。	根据《动物检疫法》，农业部门兽医对半成品肠衣检疫合格后出具《动物检疫合格证明》，该证明内容较为简单，未列明欧方关注的屠宰场信息和羊肠衣去除风险物质等内容，因此欧方认为不符合其相关规定。但是，中方已通过采取有效措施来保证相关产品符合欧方要求。一是肠衣出口加工企业对原料验收的管理，羊肠衣传统工艺上因回肠部分没有实际使用价值，已在前道工序中除去，企业在接收原料时重点加强了此项工作的验收；二是有关检验检疫机构对企业接收原料实施验证，在监管过程中，通过灌水方式验证回肠部分是否已除去，进而证明出口肠衣产品已去除风险物质。三是国家质检总局对羊肠衣去除风险物质的问题进行了培训，重点介绍了欧洲天然肠衣组织起草的肠衣加工 HACCP 指南。中方认为，通过上述措施的实施，可以保证中国输欧肠衣符合欧方相关要求。

			According to the "animal quarantine law ", the veterinarians from 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 mainly strengthen inspection on this aspect. Second, CIQ verify establishment's implementation of receiving raw materials. In the process of supervision, verifying weather ileum have been removed or not by running water, so as to prove that casings products for export has been removed risk material. Third, AQSIQ has carried out trainings on how to remove risk materials from sheep casings, mainly introduced casings processing HACCP guidelines drafted 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.