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OVERVIEW REPORT OF A SERIES OF AUDITS CARRIED OUT IN
2011 AND 2012

IN ORDER TO EVALUATE THE OFFICIAL CONTROLS RELATED TO SLAUGHTER
AND PROCESSING OF FRESH MEAT, IN PARTICULAR FRESH EQUINE MEAT

1. EXECUTIVE SUMMARY

This is an overview report on a series of audits carried out in the Member States (MS) in 2011 and 2012 by the Food and Veterinary Office (FVO). The series consisted of five audits carried out in the most significant Member States (MS) for the production and consumption of horse meat (Belgium, France, Italy, Poland and Spain). The objective of the audits was to evaluate the official control systems in place.

In general, all MS visited have the structures, the powers, the qualified staff and the appropriate procedures required including for the prioritisation of official controls in establishments. The system in place to verify the effectiveness of official controls has the potential to be fit for purpose. Nevertheless the deficiencies identified by the FVO audits demonstrate that improvements are both possible and necessary. In addition the situation found in one MS demonstrated the lack of reliability of the system in this MS.

A system for the approval of horse meat producing establishments was in place in all the MS visited. This system was in conformity with the European Union (EU) requirements in three of the MS visited. In one MS most of the approvals had not been re-evaluated as required after the entry into force of the Hygiene Package and in the remaining MS, the slaughterhouses visited had been approved without prior evaluation and not kept under review during official controls.

In most establishments visited structures, operations flows and equipment were satisfactory as well as the maintenance of these structures and equipment. Only minor deficiencies were identified. In most establishments visited some deficiencies regarding operational hygiene were observed. In slaughterhouses specifically, significant deficiencies were identified particularly in relation to the de-hiding procedures and sterilisers. In some of them, maintenance as well as cleaning and disinfection issues were noted. In one MS, the situation found was significantly worse.

The Central Competent Authorities (CCAs) had put in place a registration system for holdings and an approval system for assembly centres for equidae intended for intra EU trade. Significant deficiencies in the approval procedures and official controls of assembly centres were found in one MS.

The holdings and the assembly centres visited were generally in line with EU requirements with one exception. However weaknesses were identified in one livestock market in one MS, and in four assembly centres visited in another MS.

A system of identification of equidae, as laid down in Regulation (EC) No 504/2008, was in place in all the countries visited. There are a large number of different passport models in use in the EU and numerous deficiencies were identified. It was difficult at times to differentiate between genuine and false passports.

Due to missing information, lack of updates and an absence of plausibility tests, the databases evaluated in the MS visited could not be considered to be reliable.

Traceability systems and Hazard Analysis Critical Control Points (HACCP) based procedures were in place in all the countries visited, with some deficiencies noted in the design of the HACCP plan, the risk analysis, the identification and the monitoring of the critical control points.

The system of Food Chain Information (FCI) was not properly implemented in any of the MS visited, for example, providing information which was incomplete, faulty or unreliable.

Procedures for sampling and laboratory testing for Trichinae were in place and implemented in all the countries visited. However, deficiencies in the action of the National Reference Laboratory (NRL) were found in two MS.

Ante- and post-mortem inspections were carried out in general in line with EU requirements. In one MS ante-mortem inspections were not compliant.

A number of recommendations have been made to all MS with a view to addressing the deficiencies identified during these audits.

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ABBREVIATIONS AND DEFINITIONS USED IN THIS REPORT

Abbreviation	Explanation
CA(s)	Competent Authority(ies)
CCA(s)	Central Competent Authorities
COM	European Commission
DG(SANCO)	Health & Consumers Directorate General
EC	European Commission
EU	European Union
FBO(s)	Food Business Operator(s)
FCI	Food Chain Information
FVO	Food and Veterinary Office
HACCP	Hazard Analysis Critical Control Points
Hygiene Package	Regulations (EC) No 852/2004, No 853/2004 and No 854/2004
MS	Member States
NRL	National Reference Laboratory
OV	Official Veterinarian

2. INTRODUCTION

This series of audits was undertaken in 2011 and 2012 in five MS (Belgium, France, Italy, Poland and Spain) having been identified, after a desk study as the most important ones in relation to the production and consumption of horse meat.

Reports on these individual audits are accessible at:

http://ec.europa.eu/food/fvo/index_en.cfm

This report presents findings, conclusions and recommendations arising from the individual audits which are relevant to the control authorities in all MS.

3. OBJECTIVES

The objective of the audits was to evaluate the official control systems in place in relation to the production of equine meat.

In terms of scope, the audits concentrated primarily on the organisation of official controls, control and verification procedures and methods of enforcement, and registration and approval of establishments. The specific area under review and in the framework of Regulations (EC) No 178/2002, (EC) No 852/2004, (EC) No 853/2004 and (EC) No 854/2004 were controls over fresh meat from equidae.

In the MS visited, the audit teams visited the central, regional and local authorities, and a number of representative laboratories, establishments (slaughterhouses, cutting plants and meat product establishments), markets, collection centres and horse trader holdings.

The establishments and regions visited were selected in relation to their production output, i.e. priority was given to the major food business operators (FBOs) involved in the horse meat industry.

4. LEGAL BASIS

The audits were carried out under the general provisions of the legislation of the EU and, in particular Article 45 of Regulation (EC) No 882/2004 of the European Parliament and of the Council of 29 April 2004 on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules.

References to relevant EU legislation are given in Annex I and refer, where applicable, to the most recently amended version.

5. BACKGROUND

Between 2000 and 2010, the live equidae population has remained stable in the EU MS: approximately 4.700.000, of which 4.000.000 horses, 500.000 asses and 200.000 are mules.

On the contrary the number of equidae slaughtered in the EU for the production of meat has decreased dramatically between 2000 and 2010 from more than 400.000 to less than 200.000. Nevertheless it has to be noted that this decrease is mainly due to the decrease of equidae slaughtered in Italy from 280.000 in 2001 to less than 100.000 in 2008 and to 56.000 in 2011. The number of horses slaughtered in the other important MS (Belgium, France, Poland and Spain) has remained quite stable from 15.000 to 40.000 animals annually.

Not surprisingly, the production of equine meat in the EU has followed the same trends falling from more than 100.000 tonnes in 2001 to 55.000 in 2008. Again Italy has played the main role in this decrease from more than 65.000 tonnes in 2001 to 25.000 tonnes in 2008. In the other important MS the production has slightly decreased with the exception of Poland where the production has grown from 7.000 to 10.000 tonnes between 2003 and 2008.

Imports of horse meat from Third Countries have also decreased in recent years from approximately 55.000 tonnes in 2004 to 30.000 tonnes in 2010.

All this is the consequence of the fall in popularity of horse meat for the EU consumer. The consumption of horse meat in the most important MS has fallen from around 150.000 tonnes in 2001 to less than 80.000 tonnes in 2010.

6. OVERVIEW OF MAIN FINDINGS

6.1. COMPETENT AUTHORITIES

6.1.1. Designation of Competent Authorities

Legal Requirements

Article 4 of Regulation (EC) No 882/2004 requires Member States to designate the CAs responsible for the purposes and official controls set out in the Regulation. It also lays down operational criteria for the CAs

Findings

In the MS visited, the official control systems put in place for horse meat production was the same as for the other red meat productions. The CAs have structures, powers, qualified staff and appropriate procedures required including for the prioritisation of the controls. Nevertheless the audits revealed weaknesses in some regions of two MS visited where the CA mentioned the lack of staff as being the reason that official controls were not properly carried out.

6.1.2. Co-ordination between Competent Authorities

Legal Requirements

Article 4(3) of Regulation (EC) No 882/2004 provides for efficient and effective co-ordination and co-operation between CAs. Article 4(5) of the Regulation requires that, when, within a CA, more than one unit is competent to carry out official controls, efficient and effective co-ordination and cooperation shall be ensured between the different units.

Findings

In most MS visited no problems were identified concerning the co-operation and co-ordination activities between the different levels of the CA as described in the Country Profiles. Nevertheless in one MS it was not evident that there was efficient and effective co-ordination between all the CAs involved in relation to official controls in the scope of this audit and this is not in line with Article 4(3) of Regulation (EC) No 882/2004.

6.1.3. Registration/Approval of food business operators

Legal Requirements

Article 31 of Regulation (EC) No 882/2004 requires Member States to establish procedures for the registration/approval of food and feed business establishments, for reviewing compliance with conditions of approval and for the withdrawal of approvals.

Findings

The system for approval of establishments found in the MS visited was in general in line with the provisions laid down in Article 31 of Regulation (EC) No 882/2004, Article 3 of Regulation (EC) No 853/2004 and Article 3 of Regulation (EC) No 854/2004.

However in one MS most of the approvals had not been reviewed since the entry into force of the Hygiene Package. In another two, approval was given to establishments that fell far short of the EU requirements.

6.1.4. Prioritisation of official controls

Legal Requirements

Article 3 of Regulation (EC) No 882/2004 requires that official controls are carried out regularly, on a risk basis and with appropriate frequency. Controls shall be carried out at any of the stages of the production and processing chain and, in general, are to be carried out without prior warning. Controls shall be applied with the same care to exports from the EU, imports into the EU and to product placed on the EU market.

Findings

In all MS visited a risk based system was in place to verify the compliance of the establishments with the EU requirements. In one MS, although the CCA had prepared and distributed instructions on how to prioritise official controls in establishments using a risk based evaluation; one region had not put in place any system.

6.1.5. Official sampling and laboratory analysis

Legal Requirements

Article 4 of Regulation (EC) No 882/2004 requires CAs to have, or to have access to, adequate laboratory capacity. Article 11 of the Regulation establishes requirements for sampling and analysis and Article 12 requires the CA to designate laboratories that may carry out analysis of samples taken during official controls. It also lays down accreditation criteria for the laboratories so designated.

Findings

In the MS visited, the laboratories in charge of *Trichinella* detection had been approved in line with procedures put in place by the CCA. In addition, all were accredited or being accredited with the exception of the laboratories situated in the slaughterhouses. They took part in ring tests for verifying their competences organised by the NRL. In three MS, the NRL has confirmed that up to now, to organise the ring tests, only pig meat had been used. In addition some deficiencies, some of them significant, have been identified in the laboratory procedures in place and in the follow-up action carried out in the case of deficiencies identified by the CAs.

6.1.6. Procedures for performance of control activities

Legal requirements

Article 8 of Regulation (EC) No 882/2004 requires that CAs carry out their official controls in accordance with documented procedures, containing information and instructions for staff performing official controls.

Findings

In all MS visited, the CCA had comprehensive documented procedures in place, covering the areas evaluated in this audit. The CCA have continued to establish and review check-lists. In addition, product *fiches* with technical data, specifications, requirements and limits, where available, have been developed to guide the industry and the Official Veterinarians (OVs). Nevertheless, in one MS these procedures had not been implemented in one region visited.

6.1.7. Enforcement measures

Legal requirements

Article 54 of Regulation (EC) No 882/2004 requires a CA which identifies a non-compliance to take appropriate action to ensure that the operator remedies the situation. Article 55 of the Regulation states that Member States shall lay down the rules on sanctions applicable to infringements of feed and food law and other EU provisions relating to the protection of animal health and welfare and shall take all measures necessary to ensure that they are implemented. The sanctions provided for must be effective, proportionate and dissuasive.

Findings

In the majority of cases evaluated by the FVO audit team, the CAs had imposed adequate enforcement actions to ensure that the FBO corrected the non-compliances identified.

Nevertheless, deficiencies were identified particularly in two of the MS visited. In one MS the follow-up for deficiencies identified was weak and did not include deadlines or take any action when the deadlines had not been respected. In the other MS deadlines were rarely established for the correction of deficiencies and as a result, identified deficiencies remained outstanding over long periods of time. Furthermore, when subsequent inspections noted the same deficiencies a new deadline for action was set.

6.1.8. Verification and review of official controls and procedures

Legal Requirements

Article 4 of Regulation (EC) No 882/2004 requires the CAs to ensure the impartiality, consistency and quality of official controls at all levels and to guarantee the effectiveness and appropriateness of official controls. Article 8 states that they must have procedures in place to verify the effectiveness of official controls, to ensure effectiveness of corrective action and to update documentation where needed. Under Article 4 of the Regulation CAs are required to carry out internal audits, or have external audits carried out. These must be subject to independent scrutiny and carried out in a transparent manner.

Findings

All the MS visited had put in place a system to ensure the impartiality, consistency and quality of official controls at all levels and to guarantee the effectiveness and appropriateness of official controls. They also had procedures in place to verify the

effectiveness of official controls, to ensure effectiveness of corrective action and to update documentation where needed. Internal audits were also carried out. Nevertheless in most of the MS visited these internal audits do not yet review the areas covered by the FVO audit. In addition, in one MS the significant number and the significance of the deficiencies found questioned the ability of this system to deliver the guarantees mentioned above.

6.2. OFFICIAL CONTROLS OVER FOOD BUSINESS OPERATORS' COMPLIANCE WITH HYGIENE RULES AT ESTABLISHMENT LEVEL

6.2.1. General and specific hygiene requirements

Legal Requirements

Article 4(2) of Regulation (EC) No 852/2004 establish that the FBO carrying out any stage of production, processing and distribution of food after the stage of primary production/associated operations shall comply with general hygiene requirements as set out in Annex II to Regulation (EC) No 852/2004. These provisions relate to cleaning and maintenance, layout, design, construction, sitting and size of food premises. Article 3 of Regulation (EC) No 853/2004 sets out that the FBO shall comply with the specific requirements of Annexes II and III to this Regulation. Article 4(3) of Regulation (EC) No 852/2004 states that FBOs shall adopt specific hygiene measures regarding compliance with microbiological criteria for foodstuffs, compliance with temperature control requirements and sampling and analyses.

Article 4(2) of Regulation (EC) No 854/2004 specifies that the CA shall carry out official controls in respect of products of animal origin to verify the FBO's compliance with these requirements.

Findings

In most establishments visited structures, operations flows, equipment, maintenance of structures and equipment were satisfactory. Only minor deficiencies were identified. In most establishments visited some deficiencies regarding operational hygiene were observed.

In all slaughterhouses, significant deficiencies were identified in relation to the de-hiding procedures and sterilisers. In some of them, maintenance as well as cleaning and disinfection issues were noted. In one or more establishments in three of the MS visited dirty or very dirty animals were slaughtered.

In one MS, the situation found was significantly worse. Most of the slaughterhouses visited did not comply with some of the general hygiene requirements and numerous shortcomings were identified. In six out of eight slaughterhouses visited, the performance of the FBO did not ensure that general hygiene requirements were met. Workers were not properly trained and they were not using appropriate slaughter techniques. Significant problems with cleaning, slaughter hygiene, especially skinning and evisceration were noticed. Faecal contamination was widely present on carcasses. Microbiological testing of carcasses was not reliable and failed, for example, to reveal widespread contamination. Own checks were not properly implemented in some cases particularly in relation to pest controls and procedures based on HACCP principles.

6.2.2. HACCP-based systems

Legal requirements

On the basis of Article 5 of Regulation (EC) No 852/2004 the FBO shall put in place, implement and maintain a permanent procedure or procedures based on the HACCP principles. Section II of Annex II to Regulation (EC) No 853/2004 lays down the specific requirements for HACCP-based procedures in slaughterhouses. Official controls in respect of all products of animal origin in the scope of Regulation (EC) No 854/2004 shall include audits of HACCP-based procedures (Article 4 (3)(a) and (5) of Regulation (EC) No 854/2004).

Findings

In all establishments visited HACCP-based procedures were implemented. Official controls on HACCP-based procedures were carried out by the CAs, as part of their periodical audits. In the establishments where the FVO audit team randomly reviewed parts of the FBO's HACCP-based procedures, no major deficiencies were identified. However, deficiencies concerning the design of the HACCP plan, the risk analysis, the identification and the monitoring of the critical control points were noted, as well as failures in the implementation of some prerequisites in one MS.

6.2.3. Microbiological criteria for foodstuffs

Legal requirements

Details on the microbiological criteria foodstuffs shall comply with are set out in Regulation (EC) No 2073/2005. Article 1 of Regulation (EC) No 2073/2005 specifies that the CA shall verify compliance with the rules and criteria laid down in that Regulation. These cover a range of items with regard to requirements for slaughterhouses, cutting plants, emergency slaughter, game handling, raw milk and dairy products and other products of animal origin.

Findings

In all but one MS carcasses and products were sampled in accordance with Regulation (EC) No 2073/2005 in all establishments visited. In general a trend analysis was carried out. In one MS several additional tests were carried out by the FBOs. However in all slaughterhouses evaluated in one MS the system in place was not in compliance with the EU Regulation.

6.2.4. Traceability, labelling and identification marking

Legal requirements

According to Article 18 of Regulation (EC) No 178/2002 the traceability of food and food producing animals and any other substance intended to be incorporated into a food shall be established at all stages of production, processing and distribution. The FBO shall have in place systems and procedures to identify from whom they have been supplied and the other businesses to which their products have been supplied. Article 4(6) of Regulation (EC) No 854/2004 requires that the verification of compliance with traceability requirements takes place in all approved establishments.

Provisions for the identification marking of a product of animal origin are made in Article 5 and Annex II, Section I to Regulation (EC) No 853/2004 and verification of compliance with

these requirements is foreseen by Article 4(6) of Regulation (EC) No 854/2004. Article 3 of Directive 2000/13/EC sets out the particulars on the labelling of foodstuffs to be delivered as such to the ultimate consumer. Regulations (EC) No 1760/2000 and 1825/2000 set out specific labelling requirements for beef meat.

Findings

In all slaughterhouses visited, systems were in place in relation to traceability. The systems were based in general on production/slaughter dates.

Traceability is part of the official controls of the CA. Traceability exercises were carried out by the FVO audit team in some establishments visited and were generally satisfactory. However, in some establishments the internal traceability was not fully reliable.

In one MS the CAs failed to identify that the quantities of meat produced were not in line with the quantities received.

Labelling and identification marking requirements were generally well implemented. Nevertheless in one cutting plant, cut meat was packed in pre-printed cartons for horse meat originating in a third country and still bearing the original identification number. This created obvious risks of wrong labelling and traceability.

6.2.5. Food chain information

Legal requirements

According to Article 3 of Regulation (EC) No 853/2004, the FBO shall comply with the relevant provisions of Annex II and III to this Regulation. In particular the FBOs operating slaughterhouses must as appropriate, request, receive, check and act upon FCI in respect of all animals, other than wild game, sent or intended to be sent to the slaughterhouse. According to Article 5(1) of Regulation (EC) No 854/2004 the OV shall carry out inspection tasks in slaughterhouses also as regards FCI. Commission Regulation (EC) 1950/2006 established a list of substances essential for the treatment of equidae.

Findings

All the slaughterhouses visited had in place procedures to implement the EU legislation in relation to FCI. Nevertheless in nearly all cases evaluated this implementation was not satisfactory:

- in numerous cases the document which should provide the FCI was not fully completed and/or not dated and/or not signed;
- in numerous other cases, the guarantees provided did not or only partially covered the period before slaughter;
- in certain cases, the FBO had signed the FCI documents for animals no longer under his/her control;
- in some cases no FCI had been provided at all.

In addition, in some MS no template had been issued by the CCA for the FCI document. As a consequence different models were used, some of which did not provide all the requested information.

Finally, in most cases evaluated, the CAs had not identified the deficiencies and when they did, they did not take appropriate action to oblige the FBOs to amend their system.

One MS has not put in place any system for providing FCI. It stated that it considers that the

information contained in chapter IX (Medical treatments) of the passport fulfils the EU requirements on FCI. The additional information as foreseen in Regulation (EC) No 853/2004 (Annex II, Section III) was not requested in this MS.

6.2.6. Animal identification

Legal requirements

Article 4(1) of Regulation (EC) No 852/2004 requires that FBOs carrying out primary production shall also comply with some specific requirements provided for in Regulation (EC) No 853/2004 including sending only properly identified animals to the slaughterhouse and to provide slaughterhouse operators with the FCI. FBOs operating slaughterhouses must ensure that the procedures that they have put in place in accordance with the general requirements of Article 5 of Regulation (EC) No 852/2004 guarantee that each animal or, where appropriate, each lot of animals accepted onto the slaughterhouse premises is properly identified (Annex II, Section II of Regulation (EC) No 853/2004). Regulation (EC) No 504/2008 sets out the methods for identification of equine animals.

Findings

CCAs have put in place a registration system for holdings and an approval system for assembly centres for equidae intended for intra EU trade.

The holdings and the assembly centres visited were in general in line with EU requirements with the exception of one market in a MS where the situation was found unsatisfactory from a technical and animal welfare point of view. In addition, in one MS, as already identified in a previous audit, the implementation of national and EU requirements for assembly centres could not be guaranteed. Official controls (including approval and/or re-approval of assembly centres) were weak in all regions visited. The CA explained that this was due to the lack of staff. This has been a long standing issue in that MS.

In all MS visited the CCAs had put in place an identification system containing the elements requested by Regulation (EC) No 504/2008: microchips, passports, database.

In one MS the CCA have decided to add additional requirements to those of Commission Regulation (EC) No 504/2008:

- The equidae from other MS that are introduced definitively in the MS should be identified and registered in the database within 30 days of their arrival. Equidae living in the MS for more than 90 days are deemed to be definitively introduced. The database must be updated within 10 working days in case, *inter alia*, of a change of ownership, in the case of definitive departure and in the case of exclusion from the food chain. Other changes must also be notified: change of keeper (in the case of supervision for more than 90 days), death of the animal and the definitive introduction of horses from non-EU countries onto the MS territory. It is the responsibility of the new owner to update the database.
- The transponder is considered as a medical device and can only be implanted by veterinarians officially authorised to carry out this specific task.

In all MS visited transponders were removed and collected after slaughter and handed over to the OV.

There are a large number of different passport models in use in the EU. It is sometimes very difficult to differentiate between genuine and false passports. In a limited number of cases the following inaccuracies were seen: transponder number not included in the passport but only in the mutation document, transponder number not validated by the signature and/or stamp of the person who performed the identification or the issuing body; loose pages;

doubtful issuing body; page with the status "intended for slaughter for human consumption" missing or not completed. During the visits in the traders' holdings the FVO audit team noticed that Section IX of the passports almost never showed treatment with essential substances. In addition, many passports did not show vaccinations, which suggested that the passports were not being used as provided for by the legislation.

Deficiencies have been noted concerning identification controls. Certain CAs did not check the correspondence relating to the equidae and the passport.

A centralised database collecting information concerning identification of equidae and passports issued was in place in four MS. Deficiencies were found due to the lack of automatic plausibility checks in all MS. In one MS, in addition, the lack of detection of animals not fit for human consumption was observed. In another MS the link between the two existing databases had been created very recently and the transfer of information between both databases was incomplete, resulting in a distortion of data.

6.2.7. *Ante-mortem and post-mortem inspection*

Legal requirements

Article 5(1) of Regulation (EC) No 854/2004 requires that the OV carries out inspection tasks, including ante-mortem inspection of all animals before slaughter in accordance with the general requirements of Section I, Chapter II of Annex I to Regulation (EC) No 854/2004 and post-mortem inspection in accordance with the general requirements of Section I, Chapter II of Annex I and the specific requirements of Section IV, Regulation (EC) No 854/2004.

Specific rules on official controls for *Trichinella* in meat are laid down in Regulation (EC) No 2075/2005.

Findings

Ante- and post-mortem inspections were generally satisfactorily implemented. Sampling and testing of horse carcasses were carried out in compliance with the requirements of Regulation (EC) No 2075/2005. In some MS, deficiencies have been identified in the recording of the results of examinations and testing.

In all slaughterhouses visited in one MS ante mortem examination took place but it was not in line with EU requirements. It was carried out by auxiliaries and only the animals selected by the auxiliaries were presented to the OV for examination.

6.2.8. *Health marking*

Legal requirements

Article 5(2) of Regulation (EC) No 854/2004 requires that health marking of carcasses of domestic ungulates, farmed game mammals other than lagomorphs and large wild game as well as half carcasses, quarters and wholesale cuts shall be carried out in slaughterhouses and game-handling establishments by, or under the responsibility of, the OV when official controls have not identified any deficiencies that would make the meat unfit for human consumption.

Findings

Health marking was satisfactory in all MS visited. Only minor deficiencies were identified

6.2.9. Animal welfare at the time of slaughter or killing

Legal requirements

Article 5(1) of Regulation (EC) No 854/2004 requires that the OV carries out inspection tasks, including animal welfare. Council Directive 93/119/EC sets out EU rules with regard to the protection of animals at the time of slaughter or killing.

Findings

In general the requirements in relation to animal welfare were correctly implemented in most of the establishments visited. Nevertheless deficiencies were noted particularly concerning the restraining of the animals and the design of the stunning box.

In four out of seven slaughterhouses visited in one MS several animal welfare requirements laid down in Council Directive 93/119/EC were not respected, in particular with regard to the stunning operations for horses. Training of staff, able to recognise the signs of ineffective stunning and recovery from stunning, was inadequate.

In another MS the EU requirements were not respected in four of the five slaughterhouses visited mainly due to inadequate management of animals and inappropriate construction of the stunning boxes.

6.2.10. Documentation of official controls

Legal requirements

Article 9 of Regulation (EC) No 882/2004 requires CAs to draw up reports on the official controls carried out, including a description of the purpose of official controls, the methods applied, the results obtained and any action to be taken by the business operator concerned.

Findings

In all but one region in one MS, official controls were well documented and the reports contained all the information required by Article 9 of Regulation (EC) No 882/2004. A copy was given to the FBO.

7. OVERVIEW OF MAIN CONCLUSIONS

Slaughter hygiene and in particular de-hiding procedures as well as animal welfare (stunning procedures) remain an issue in most slaughterhouses visited. The situation found in relation to official controls in the horse meat sector was mixed. The structures in place were generally satisfactory with the potential to deliver on requirements. However, the scope for improvements is considerable and in some cases is essential if standards are to be raised to an acceptable level and maintained.

Significant efforts have been made by the sector and the CAs in the MS to ensure that the identification of horses is ensured. Systems were in place in all MS visited to implement the requirements concerning controls over the identification of animals. However, the lack of uniformity between the different passports used in the MS and the deficiencies in the way they are completed by the persons responsible (FBOs, veterinarians) weaken the efficacy of these systems. In addition the lack of reliability of the databases limits the efficiency of the

controls on horse movements.

Although the FCI was generally available, the requirements were not satisfactorily implemented. The reliability of the information covering the period prior to slaughter is not sufficiently ensured.

In one MS official controls as currently implemented in the areas evaluated during the audit (in particular ante-mortem inspection and approval of assembly centres) are not in line with the requirements of Regulation (EC) No 882/2004, Council Directive 2009/156/EC as well as those of Regulation (EC) No 854/2004, as already noted in previous reports.

The findings of the audit in one MS indicate serious deficiencies in the performance of official controls carried out by the CAs to verify compliance with the requirements laid down in Regulation (EC) No 852/2004 and Regulation (EC) No 853/2004. In particular, implementation of the general and specific control requirements provided for in Regulation (EC) No 882/2004 and in Regulation (EC) No 854/2004 is unsatisfactory.

8. RECOMMENDATIONS

Specific recommendations have been addressed to the MS visited.

The recommendations below cover the areas where all MS should improve their performance.

N°.	Recommendation
1.	The Competent Authorities should ensure that official controls carried out are effective, as required by Article 4(2)(a) of Regulation (EC) No 882/2004, in particular with regard to the implementation of general and specific hygiene requirements and that enforcement action is taken as required by Article 54 of Regulation (EC) No 882/2004.
2.	The Competent Authorities should put in place control procedures to ensure that the food chain information, as required by Section III, Annex II to Regulation (EC) No 853/2004, in particular regarding the administration of veterinary medicinal products and their withdrawal period, is reliable.
3.	To take appropriate actions to improve the working and reliability of the databases in the framework of Regulation EC No 504/2008.
4.	To ensure that during identity checks the food business operators have in place procedures in order to establish a unique link between the horse and the passport in line with the requirements of Regulation EC No 504/2008, Article 3.
5.	To put in place a more reliable system for the issuing and registration of passports to minimise attempts at falsification.
6.	To ensure that the Competent Authorities control the food business operators' obligations concerning the identification of horses in line with the requirements of Regulation (EC) No 504/2008, Article 3.
7.	To ensure that animal welfare requirements as laid down in

	Regulation (EC) No 1099/2009 are met in slaughterhouses slaughtering horses.
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ANNEX 1 – LEGAL REFERENCES

Legal Reference	Official Journal	Title
Reg. 1760/2000	OJ L 204, 11.8.2000, p. 1-10	Regulation (EC) No 1760/2000 of the European Parliament and of the Council of 17 July 2000 establishing a system for the identification and registration of bovine animals and regarding the labelling of beef and beef products and repealing Council Regulation (EC) No 820/97
Reg. 1825/2000	OJ L 216, 26.8.2000, p. 8-12	Commission Regulation (EC) No 1825/2000 of 25 August 2000 laying down detailed rules for the application of Regulation (EC) No 1760/2000 of the European Parliament and of the Council as regards the labelling of beef and beef products
Reg. 178/2002	OJ L 31, 1.2.2002, p. 1-24	Regulation (EC) No 178/2002 of the European Parliament and of the Council of 28 January 2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety
Reg. 852/2004	OJ L 139, 30.4.2004, p. 1, Corrected and re-published in OJ L 226, 25.6.2004, p. 3	Regulation (EC) No 852/2004 of the European Parliament and of the Council of 29 April 2004 on the hygiene of foodstuffs
Reg. 853/2004	OJ L 139, 30.4.2004, p. 55, Corrected and re-published in OJ L 226, 25.6.2004, p. 22	Regulation (EC) No 853/2004 of the European Parliament and of the Council of 29 April 2004 laying down specific hygiene rules for food of animal origin
Reg. 854/2004	OJ L 139, 30.4.2004, p. 206, Corrected and re-published in OJ L 226, 25.6.2004, p. 83	Regulation (EC) No 854/2004 of the European Parliament and of the Council of 29 April 2004 laying down specific rules for the organisation of official controls on products of animal origin intended for human consumption
Reg. 882/2004	OJ L 165, 30.4.2004, p. 1, Corrected and re-published in OJ L 191, 28.5.2004, p. 1	Regulation (EC) No 882/2004 of the European Parliament and of the Council of 29 April 2004 on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules

Legal Reference	Official Journal	Title
Reg. 2073/2005	OJ L 338, 22.12.2005, p.1-26	Commission Regulation (EC) No 2073/2005 of 15 November 2005 on microbiological criteria for foodstuffs
Reg. 2074/2005	OJ L 338, 22.12.2005, p. 27-59	Commission Regulation (EC) No 2074/2005 of 5 December 2005 laying down implementing measures for certain products under Regulation (EC) No 853/2004 of the European Parliament and of the Council and for the organisation of official controls under Regulation (EC) No 854/2004 of the European Parliament and of the Council and Regulation (EC) No 882/2004 of the European Parliament and of the Council, derogating from Regulation (EC) No 852/2004 of the European Parliament and of the Council and amending Regulations (EC) No 853/2004 and (EC) No 854/2004
Reg. 2075/2005	OJ L 338, 22.12.2005, p. 60-82	Commission Regulation (EC) No 2075/2005 of 5 December 2005 laying down specific rules on official controls for <i>Trichinella</i> in meat
Reg. 1950/2006	OJ L 367, 22.12.2006, p.33-45	Commission Regulation (EC) No 1950/2006 of 13 December 2006 establishing, in accordance with Directive 2001/82/EC of the European Parliament and of the Council on the Community code relating to veterinary medicinal products, a list of substances essential for the treatment of equidae
Reg. 504/2008	OJ L 149, 7.6.2008, p. 3-32	Commission Regulation (EC) No 504/2008 of 6 June 2008 implementing Council Directives 90/426/EEC and 90/427/EEC as regards methods for the identification of equidae
Reg. 1162/2009	OJ L 314, 1.12.2009, p. 10-12	Commission Regulation (EC) No 1162/2009 of 30 November 2009 laying down transitional measures for the implementation of Regulations (EC) No 853/2004, (EC) No 854/2004 and (EC) No 882/2004 of the European Parliament and of the Council
Reg 1099/2009	OJ L 303, 18.11.2008, p. 1-30	Council Regulation (EC) No 1099/2009 of 24 September 2009 on the protection of animals at the time of killing

Legal Reference	Official Journal	Title
Dir. 96/93/EC	OJ L 13, 16.1.1997, p. 28-30	Council Directive 96/93/EC of 17 December 1996 on the certification of animals and animal products
Dir. 98/83/EC	OJ L 330, 5.12.1998, p. 32-54	Council Directive 98/83/EC of 3 November 1998 on the quality of water intended for human consumption
Dir. 2000/13/EC	OJ L 109, 6.5.2000, p. 29-42	Directive 2000/13/EC of the European Parliament and of the Council of 20 March 2000 on the approximation of the laws of the Member States relating to the labelling, presentation and advertising of foodstuffs
Dir. 2009/156/EC	OJ L 192, 23.7.2010, p.1 <i>(Act adopted before 1 December 2009 under the EC Treaty, the EU Treaty and the Euratom Treaty)</i>	Council Directive 2009/156/EC of 30 November 2009 on animal health conditions governing the movement and importation from third countries of equidae

ANNEX 2 – LIST OF COUNTRIES COVERED IN THIS REPORT

AUDIT REFERENCE	COUNTRY	DATES
DG(SANCO)/2011- 6021	Spain	03.05.2011 – 13.05.2011
DG(SANCO)/2012-6332	Belgium	23.01.2012 – 02.02.2012
DG(SANCO)/2012-6333	Italy	18.06.2012 – 28.06.2012
DG(SANCO)/2012-6346	Poland	23.01.2013 – 03.02.2012
DG(SANCO)/2012-6354	France	03.09.2012 – 14.09.2012