EUROPEAN COMMISSION
HEALTH AND CONSUMERS DIRECTORATE-GENERAL

Directorate F - Food and Veterinary Office

DG(SANCO) 2009-8072 - MR FINAL

FINAL REPORT OF A SPECIFIC AUDIT

CARRIED OUT IN

THE UNITED KINGDOM

FROM 20 TO 29 OCTOBER 2009

IN ORDER TO EVALUATE THE FOOD SAFETY CONTROL SYSTEMS IN PLACE GOVERNING THE PRODUCTION AND PLACING ON THE MARKET OF POULTRY MEAT AND POULTRY MEAT PRODUCTS AS WELL AS THE SYSTEMS IN PLACE TO CONTROL THE SALMONELLA RISK IN BROILERS

IN THE CONTEXT OF A GENERAL AUDIT

In response to information provided by the Competent Authority, any factual error noted in the draft report has been corrected;any clarification appears in the form of an endnote.

Executive Summary

This report describes the outcome of an inspection mission carried out by the Food and Veterinary Office in the United Kingdom, from 20 to 29 October 2009.

The objective of the mission was to verify, as part of the general audit, that official controls for poultry meat and poultry meat products and Salmonella risk in broilers are carried out in compliance with the Community legislation and in accordance with the UK multi-annual national control plan drawn up in accordance with Article 41 of Regulation (EC) No 882/2004.

The report concludes that there is a comprehensive and well documented system of regular official controls of poultry meat and poultry meat product establishments. Overall the system, which is subject to internal audits, works effectively. However, there are some weaknesses in relation to establishment approval procedures, ante-mortem inspection in slaughterhouses and own check Salmonella analyses in poultry slaughterhouses.

The Salmonella National Control Plan for broilers is implemented by the Competent Authorities and operators, although with some delays concerning official sampling. There are weaknesses in monitoring of operator sampling.

The report includes a number of recommendations addressed to the Competent Authorities aimed at rectifying the identified deficiencies and enhancing the control system in place.

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Abbreviations and definitions used in this report

Abbreviation	Explanation
AFBI	Agri-Food & Biosciences Institute
AHA	Animal Health Agency
AMI	Ante-mortem inspection
CA/s	Competent Authority/ies
CCA	Central Competent Authority
CSBO NI	The Control of *Salmonella* in Broiler Flocks Scheme Order (NI) 2009
CP/s	Cutting Plant/s
DARD	Department of Agriculture and Rural Development
DEFRA	Department for Environment, Food and Rural Affairs
DG(SANCO)	Health & Consumers Directorate-General
EC	European Community
ELISA	Enzyme-linked Immunosorbent Assay
EFSA	European Food Safety Authority
FBO/s	Food Business Operator/s
FCI	Food Chain Information
FLCP	Food Law Code of Practice
FSA	Food Standards Agency
FVO	Food and Veterinary Office
GB	Great Britain
GBPR	Great Britain Poultry Register
GHP	Good Hygiene Practice
HACCP	Hazard Analysis and Critical Control Point
ISO	International Organization for Standardization
LA/s	Local Authority/ies
LV/s	Lead Veterinarian/s

LACORS	Local Authorities Co-ordinators of Regulatory Services
MANCP	Multi-annual National Control Plan
MHS	Meat Hygiene Service
MI/s	Poultry Meat Inspector/s
MOC	Manual for Official Controls
MS	Member States
MSRV	Modified Semi-solid Rappaport-Vassiladis Medium
MT	Mission Team
NI	Northern Ireland
NRL	National Reference Laboratory
OV/s	Official Veterinarian/s
PIA/s	Plant Inspection Assistant/s
PM	Poultry Meat
PMI	Post mortem Inspection
PMP	Poultry Meat Products
RASFF	Rapid Alert System for Food and Feed
SE	Salmonella Enteritidis
SH/s	Slaughterhouse/s
SNCP	UK National Control Programme for *Salmonella* in chickens (Gallus gallus) reared for meat (Broilers)
SOPs	Standard Operating Procedures
ST	Salmonella Typhymurium
UK	United Kingdom
UKAS	UK Accreditation Service
VLA	Veterinary Laboratories Agency
VS	Veterinary Service
VPHU	Veterinary Public Health Unit

1 Introduction

The mission took place in the United Kingdom (UK) from 20 to 29 October 2009 and was undertaken as part of the Food and Veterinary Office's (FVO) planned mission programme.

The mission team (MT) comprised two inspectors from the FVO.

2 Objectives Of The Mission

The objective of the mission was to:

- verify, as part of a general audit, that official controls for poultry meat (PM) and poultry meat products (PMP) and *Salmonella* risk in broilers are carried out in compliance with the Community legislation and in accordance with the UK multi-annual national control plan (MANCP) drawn up in accordance with Article 41 of Regulation (EC) No 882/2004.

In pursuit of this objective, the MT proceeded as follows:

- an opening meeting was held on 20 October 2009 with the Competent Authorities (CAs) responsible for the sector. At this meeting the MT confirmed the objectives of, and itinerary for the mission, and requested additional information required for the satisfactory completion of the mission;
- the following sites were visited:

Competent authority visits		
	5	Two local authorities (LAs) Department of Agriculture and Rural Development (DARD) DARD Veterinary Service regional office Animal Health Agency (AHA) regional office Department of Environment, Food and Rural Affairs (DEFRA) central office
Laboratory visits		
	1	Laboratory involved in Food business operator (FBO) own check analyses
Primary production		
Broiler farms	2	
Food processing facilities		
Slaughterhouses	3	
Cutting plants	3	All attached to the slaughterhouses visited
Meat preparation and meat product establishments	3	One attached to the slaughterhouse visited
Cold stores	1	

- representatives from the CA accompanied the MT during the whole mission.

3 Legal Basis for the Mission

The mission was carried out in agreement with the UK authorities and under the general provisions

of Community legislation 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 in Member States performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules;
- Commission Decision 98/139/EC of 4 February 1998, laying down certain detailed rules concerning on-the-spot checks carried out in the veterinary field by Commission experts in the Member States (MS).

Full legal references are provided in ANNEX 1. Legal acts quoted in this report refer, where applicable, to the last amended version.

4 Background

4.1 Historical background

A previous FVO mission concerning production of PM in the UK took place in 1999 (DG(SANCO)/1211/1999). Follow-up to this mission took place in 2000 (DG(SANCO)/1196/2000).

4.2 Production and trade information

According to the information provided by the Food Standards Agency (FSA), total PM production in the UK in 2008 was 1,432 and 1,210 thousand tonnes of PM and broiler meat respectively. Around 250 thousand tonnes fresh/frozen PM predominantly chicken was dispatched to other MS in 2008.

5 Findings And Conclusions

5.1 Legislation and implementing measures

Legal requirements

Article 4.2 (e) and Article 8 of Regulation (EC) No 882/2004.

Findings

The primary food legislation in Great Britain (GB) is the Food Safety Act 1990 and in Northern Ireland (NI) is the Food Safety (NI) Order 1991. National legislation is required to give effect to the provisions of the Regulations (EC) Nos 852/2004, 853/2004 and 854/2004 of the European Parliament and of the Council. For this reason the Food Hygiene (England) Regulations 2006 (SI 2006/14) came into force in January 2006. Very similar national enabling legislation was adopted in all UK regions.

The Control of *Salmonella* in Broiler Flocks (England) Order 2009 and the Control of *Salmonella* in Broiler Flocks Scheme Order (NI) 2009 (CSBO NI) came into force on 9 March and 17 June 2009 respectively. Similar legislation has been adopted in Wales and Scotland. According to DEFRA and DARD Veterinary Service (VS) NI this led to a delay (until July) to begin inter alia the implementation of Commission Regulation (EC) No 646/2007 implementing Regulation (EC) No 2160/2003 of the European Parliament and of the Council as regards a Community target for the reduction of the prevalence of *Salmonella enteritidis* (SE) and *Salmonella typhimurium* (ST) in

broilers and UK National Control Programme for *Salmonella* in chickens (Gallus gallus) reared for meat (Broilers) (SNCP), in particular, regarding official sampling in broiler flocks and verification of own check sampling. However, this fact did not prevent operators from starting their own-check programmes.

Conclusions

There is a national legislation in place for the official controls in PM/PMP sector. However, the delay in adoption of national legislation enabling enforcement of SNCP in broilers prevented CAs to start official sampling at holding level and allegedly official controls on verification of own check sampling in due time.

5.2 COMPETENT AUTHORITY

Legal requirements

Article 4 of Regulation (EC) No 882/2004. Section III of Annex I to Regulation (EC) No 854/2004, in particular Chapter IV.

Findings

The description of CAs responsible of official controls on PM/PMP and *Salmonella* risk in broilers is provided in particular in Chapter 3 and Appendices A, B, C, E, F, I and L to Single Integrated National Control Plan for the United Kingdom January 2007 to March 2011 which is the UK MANCP and which is published on the internet. Country Profile of the UK on Food and Feed Safety, Animal Health, Animal Welfare and Plant Health ((DG (SANCO)/7713/2008 contains relevant information on the CAs in the scope of this mission. Furthermore, additional information on CAs responsibilities and training is provided in Chapters 1.1 and 2.3 of Part I of the report to this mission.

The MT was informed by the FSA and the Meat Hygiene Service (MHS) that post mortem inspection (PMI) in poultry slaughterhouses (SHs) is carried out by Plant Inspection Assistants (PIAs) who have been doing this work for many years. In addition, the MT was informed that since 2006 the FSA has standardised PIA's training. There are two awarding bodies providing the necessary training and examinations, achieving nationally recognised Level 2 Award for Proficiency in Poultry Meat Inspection. Individual premises can also be recognised as training centres. Newly qualified PIAs willing to start work as PIAs must be authorised by the MHS. The process of authorisation is initiated by the plant Official Veterinarian (OV). Guidance documentation relating to the authorisation of new PIAs by the CA is in the process of being developed.

The MT noted that, in establishments visited, Poultry Meat Inspectors (MIs), who can perform the same tasks as an OV other than the ante-mortem inspection, appeared adequately trained.

The CA staff, in general, were well aware of Community and national legislation and internal procedures.

Conclusions

In general, the MT noted that external and internal training on various topics in relation to official controls PM /PMP and *Salmonella* in broilers were provided for the relevant CAs' staff. The CAs staff were motivated and knowledgeable.

5.3 Official controls of production and placing on the market

5.3.1 Approval procedures

Legal requirements

Article 4 of Regulation (EC) No 853/2004. Article 31 of Regulation (EC) No 882/2004.

Findings

There is a formal procedure in place for the approval of meat establishments including poultry SHs and PM cutting plants (CPs) subject to approval under Regulation (EC) No 853/2004. The procedures for approval are also outlined in Appendix C of the UK MANCP. During the approval process, including conditional approval of PM/PMP establishments, the CAs in general followed the procedures laid down in Community legislation in the establishments visited by the MT. An assessment of Hazard Analysis Critical Control Point (HACCP)-based procedures was carried out during this approval. Standard form checklists are used during these approval inspections. However, the MT noted one case when LA advised FSA-NI (September 2008) to issue the final approval for a PMP establishment, which was operating under a conditional approval. FSA-NI only issued the final approval in October 2009. Although complying with relevant Community requirements, the establishment was in operation under conditional approval licence for more than one year which is not fully in line to Article 31(d) of Regulation (EC) No 882/2004 which states that "conditional approval shall not exceed a total of six months". This irregularity was explained by FSA-NI as being due to simple human error. The FSA stated that three poultry meat CPs and one slaughterhouse remain to be approved in the UK as a result of a re-approval process due to new Community provisions (Regulations (EC) Nos 852/2004, 853/2004, 854/2004 and 882/2004) which became applicable as from 1 January 2006. Under this re-approval exercise twelve poultry SHs and seven PM CPs were refused approval.

The lists of approved food business establishments including poultry SHs and PM cutting plants in GB and NI are available to the public on the FSA's website.

The GB Poultry Register (GBPR) is a central register containing poultry population data, including holdings with chickens reared for meat. The GBPR contains the locations of flocks of Gallus gallus with more than 50 birds. The GBPR covers England, Wales and Scotland. There is a separate Poultry Register in NI. Any person who keeps 50 or more poultry is required to notify specified information relating to those poultry under the various Avian Influenza Regulations valid in all the UK regions. In addition, the Control of *Salmonella* in Broilers Flocks Order 2009 (England) and similar legal acts in other UK regions requires the occupier of the holding on which one or more broiler flocks are kept to notify to the Secretary of State in England or to the relevant authority in other UK regions the number of flocks/ birds in the holding. The register is maintained at a local level by the CA or its agent (Animal Health Agency ((AHA)) in GB, DARD in NI). Registration with the GBPR and register in NI can be done via phone, post or online. The MT was informed that farms are registered on request without verification of any data supplied by the operator. Although there is no formal verification of data at the time of registration, when AHA staff have reason to visit the holding for any purpose (e.g. cross compliance checks, visits for welfare inspections, disease investigations etc.) they will check the details from the GBPR against the details at the farm and amend the GBPR if necessary. Also, there is a rolling 12 monthly update cycle for registrants on GBPR i.e. they get a notification letter every year providing a copy of the information they have registered and requesting an update to their details or nil

return in response. It is a legal requirement to register, failure to do so is an offence punishable by a fine or imprisonment and is enforced by LAs.

Conclusions

The CAs have generally followed the prescribed procedures to approve poultry establishments. However, the administrative procedure for granting final approvals was not always correctly applied in conformity with Article 31(d) of Regulation (EC) No 882/2004. Poultry establishments visited by the MT were re-approved after 1 January 2006 in accordance with the current Community legislation. There is a procedure in place to register flocks on broiler holdings, although there is no prerequisite for an on-the-spot check.

5.3.2 Controls in slaughterhouses: Ante-mortem and Post-mortem inspection

Legal requirements

Annex II to Regulation (EC) No 852/2004. Section II of the Annex III to Regulation (EC) No 853/2004. Regulation (EC) No 854/2004 Chapter V of Section IV of Annex I.

Findings

The MT visited three broiler SHs. Regular audit visits, separate from their normal daily work, are carried out by the OVs in the SHs. These audits are carried out on a risk basis according to the MHS Manual of Official Controls (MOC) as described in Part I, Chapter 3.2 of this report. In NI OVs of DARD Veterinary Public Health Unit (VPHU) audit SHs according to VPHU MOC. The criteria for the risk assessment are equivalent to those set out in Article 3 of Regulation (EC) No 882/2004. At each audit a risk score is calculated which establishes the frequency for the next scheduled audit. HACCP based systems were assessed by the CAs during these audits. SHs are recommended to be audited at a minimum frequency of every eight months. SHs visited by the MT were on average audited every five months. Audit reports were available in the establishments visited. FBOs were required to take corrective actions within fixed deadlines. Follow-up of shortcomings was in general satisfactory in all establishments visited. However, the MT noted that the deadlines were postponed by the OV on some occasions at the request of the FBO just prior to the expiry of the initial deadline to remedy the deficiency. In one establishment, the MT noted one case when the original deadline (two weeks) was postponed by a further two weeks and the deficiency (adequate ventilation to prevent condensation in evisceration room) was finally rectified ten weeks after the first deadline set by the OV. In this case the OV served a Hygiene Improvement Notice after the second deadline was missed by FBO. Various enforcement tools are used by the OVs to achieve establishment compliance.

The SHs visited by the MT were broadly in compliance with Community requirements. However, the following deficiency was noted:

- crates for delivering animals not fully satisfactorily cleaned in one SH in contravention of Paragraph 3, Chapter I, Section II of Annex III to Regulation (EC) No 853/2004.

<u>Ante-mortem inspection (AMI)</u>

AMI are carried out by OVs at SHs in the establishments visited by the MT. The birds arrive at SHs accompanied by Food Chain Information (FCI) issued and signed by the producer. A FCI model form has been developed by the FSA and includes Community requirements concerning FCI as specified in Point 3, Section III, Annex II to Regulation (EC) No 854/2004

including information on *Salmonella* tests in broilers. Once the FBO decides to accept animals for slaughter, the FCI is provided to the OV. In SHs, AMI is based on a FCI check, identification of the animals, animal health conditions and animal welfare issues. The MT was informed that at least one lorry from each flock is assessed by the OV during AMI. However, this is not fully in compliance with Annex I, Section I, Chapter II, Part B, Point 1(a) of Regulation (EC) No 854/2004 which requires that OV carries out an AMI on all animals before slaughter. Records were available to the MT.

Post mortem Inspection

According to MOC, PMI can be carried out by OV, MI or PIA. The MT was informed by the CA that PMI is usually carried out by MIs or PIAs.

MIs can perform PMI and assist the OV in performing auditing tasks. According to the CA and as specified in MOC, PIAs are allowed to carry out only routine PMI and record PMI results. MIs and PIAs are supervised by OVs. The OV must carry out regular PIA's work performance assessment tests. These checks should be carried out weekly by the OV and the results of the tests documented. Records of these checks were available to the MT. Where the OV considers the performance of the PIAs to be unsatisfactory then the OV must replace the PIAs with MIs.

In addition, according to the MOC, the OV inter alia must personally carry out a daily inspection of the viscera and body cavities of a representative sample of birds, the minimum number to check is 300 birds or 20% of the flock whichever is the lower. The MT noted that this rule is applied in practice.

Twenty-one poultry condition cards have been developed to achieve standardisation of PMI in poultry SHs in the UK. These condition cards are to be used as a guidance which inspection teams must follow. The MT saw application of these condition cards in practice.

In general, the MT noted that PMI is properly done. Records were available for the MT. However, the MT noted that in all three SHs visited, poultry carcases were washed after evisceration, before the PMI, preventing the OV from assessing properly possible faecal contamination (paragraph 5, Chapter IV, Section II of Annex III to Regulation (EC) No 853/2004). In the absence of a specific control to verify adherence to the provisions of the aforementioned paragraph, the PMI becomes the only point in the process where the possible contamination can be assessed. The practise of washing and/or rinsing makes that assessment impossible.

Conclusion

Other than their other daily work OVs carry out regular audits in the SHs with the risk based frequency. The conditions of slaughterhouses were generally adequate; however, some minor deficiencies were identified during the course of the FVO inspection.

In general AMI and PMI were adequately carried by the CA apart from the deficiencies noted by the MT during AMI. However, poultry carcases were washed after evisceration and before the PMI preventing the OV from adequately assessing properly the possibility of faecal contamination.

5.3.3 Controls in other establishments (CPs, cold stores, PMP establishments)

Legal requirements

Annex II to Regulation (EC) No 852/2004; Chapter III of Section II of the Annex III to Regulation (EC) No 853/2004; Section VI of Regulation (EC) No 853/2004.

Findings

The MT visited three CPs attached to SHs, two PMP and meat preparation establishments attached to SHs, one stand alone PMP and meat preparation establishment and one independent cold store.

There is a comprehensive and well documented system of official controls of PM/PMP establishments. Official controls by the MHS in GB, VS-VPHU in NI and LAs in UK in these establishments are carried out regularly on a risk basis and in accordance with the guidance documents. The criteria for the risk assessment study are those established in Article 3 of Regulation (EC) No 882/2004. FBOs' procedures based on HACCP principles are regularly assessed by the CAs. All inspection reports were available to the MT.

The establishments visited were found to be broadly in line with Annex II to Regulation (EC) No 852/2004 and Annex III to Regulation (EC) No 853/2004. However, in one integrated plant (slaughter, cutting and processing) visited the MT noted some deficiencies related to maintenance (cracked floors, rusty structures, accumulation of moulds on the ceilings) and good hygiene practice (GHP) (splashing of water while washing of carcasses in baskets; storage of exposed meat together with packed products, condensation etc.) which is not in line with Points 1 (a), (c) and (f), Chapter II and Point 3, Chapter IX, Annex II to Regulation (EC) No 852/2004 and Point (4), Chapter V, Section II, Annex III to Regulation (EC) No 853/2004. Some of these deficiencies had not previously been reported in the CA official reports and had not been corrected by FBOs.

Conclusions

There is a comprehensive and documented system of official controls of PM/PMP establishments. All the poultry establishments visited by the MT were inspected by the CAs with a risk based frequency. Despite the fact that premises visited by the MT presented in general a good level of compliance with Community requirements, some deficiencies had not previously been reported in the official reports and therefore had not been corrected by FBOs.

5.3.4 Official sampling

Legal requirements

Point 8 (c) of Article 4 of Regulation (EC) No 854/2004.

Findings

The official sampling programme at establishment level include residues (Directive 96/23/EC) and potable water (Directive 98/83/EC) for microbiological and physicochemical parameters. Regular official testing of potable water is carried out by the Drinking Water Inspectorate. Results were provided to the MT.

There is no official sampling for microbiological parameters (except for *Campylobacter* for survey purposes) carried out at PM/PMP establishment level.[1] The CAs explained that they rely on analyses carried out by FBOs. The MT was informed by the FSA that chicken meat had been tested at retail level. A UK-wide survey of *Campylobacter* and *Salmonella* contamination of fresh chicken at retail sale was undertaken by the FSA between May 2007 and September 2008 to determine *Campylobacter* and *Salmonella* prevalence in fresh chicken at retail sales level (see Chapter 3.3. of Part I of Report). Official laboratory analyses including microbiological parameters (inter alia *Salmonella, Listeria* monocytogenes, *Staphylococcus* aureus etc.) are carried out on meat products at retail level. The MT saw some results of these tests.

Conclusions

There is an official sampling programme for residues and potable water, but there is no specific sampling programme for microbiological parameters for PM/PMP at establishment level (no specific Community requirement). However there is sampling programme in place at retail level for meat products which includes microbiological parameters. In addition, a one off survey for the presence of *Salmonella* and *Campylobacter* was carried out on chicken meat at retail by the LAs.

5.3.5 Own-checks

Findings

All establishments visited by the MT had well documented own-check systems based on HACCP principles in line with Article 5 of Regulation (EC) No 852/2004. There are several comprehensive guides for the industries (e.g. Meat Industry Guide, guide for FBO for microbiological sampling etc.) developed mainly by the FSA to facilitate implementation of own checks by FBOs.

Regular audits of the HACCP plans and GHP are carried out by the CAs as required by Regulation (EC) No 854/2004, Article 4, paragraphs 3, 4 and 5. Comprehensive uniform checklists are used during these audits.

Microbiological analyses on products and potable water used in establishments are carried out in accredited laboratories. The MT noted that regular tests (with adequate results) are carried out by FBOs on water quality in particular taking into account physicochemical and microbiological parameters including *Escherichia coli* (*E.coli*), Coliform bacteria, *Enterococci*.

According to the information (agreed with FSA) provided on the UK meat industry website, broiler slaughterhouses with annual throughput below 1,000,000 birds are exempted from *Salmonella* neck skin testing.

The MT noted that regular *Salmonella* analyses (at least weekly) by FBOs are carried out

1 In their comments to the draft report the FSA provided information that The Framework Agreement for all LAs in the UK requires that each LA shall set up, maintain and implement a documented sampling policy and programme. This programme should be in accordance with any centrally issued or relevant guidance and the relevant Food Safety Act Code of Practice, whilst taking into account the nature of the food and feeding stuffs establishments within its remit. The control and enforcement activities of local authorities are monitored centrally, including the collection of data on sampling conducted by local authorities. Much of this sampling data is input by the local authorities into the central UK Food Surveillance system. The FSA provided an example of poultry meat product examination of microbiological parameters carried out by one LA.

taking into account requirements of Point 2.1.5, Chapter 2.1, Annex I to Commission Regulation (EC) No 2073/2005. The MT noted, that remedial actions (improvement of slaughter hygiene) were taken by FBO in cases of increased *Salmonella* positivity during January-October 2009 (59 *Salmonella* positive results out of 470 tested) in one SH visited. However, when visiting a laboratory testing broiler neck skin samples of one SH visited by the MT, laboratory staff informed the MT that, in 2009, 25g broiler neck skin samples were collected daily from this particular SH and tested. This is not fully in compliance with paragraph 6, Chapter 3.1, Annex I to Regulation (EC) No 2073/2005 ("For the *Salmonella* analyses, a minimum of 15 carcases shall be sampled at random during each sampling session and after chilling. A piece of approximately 10 g from neck skin shall be obtained from each carcase. On each occasion the neck skin samples from three carcases shall be pooled before examination in order to form 5 x 25 g final samples"). It was not addressed in the official reports of the CA. Results of these analyses, which were satisfactory for *Salmonella*, were provided to the MT.

Minced meat, mechanically separated meat and meat preparations are regularly tested against process hygiene criteria (aerobic colony count and *E.coli*) taking into account requirements of paragraphs 2.1.6, 2.1.7. and 2.1.8., Chapter 2.1, Annex I to Regulation (EC) No 2073/2005.

As regards food safety criteria, samples are regularly taken in poultry ready to eat products to analyse for *Listeria* monocytogenes. Poultry minced meat, meat preparations and PMP are regularly tested for *Salmonella* and other microorganisms.

Conclusions

Well documented own-check systems based on HACCP principles are in general properly implemented by FBOs and regularly assessed/supervised by CAs. In general sampling by FBO is correctly implemented. However, FBO sampling for *Salmonella* in broiler carcasses (neck skin samples) is not fully in compliance with paragraph 6, Chapter 3.1, Annex I to Regulation (EC) No 2073/2005.

5.3.6 RASFF

Legal requirements

Article 50 of the Regulation (EC) No 178/2002; Chapter I of Title VII of the Regulation 882/2004.

Findings

Within the FSA there is an Incidents Branch, which consists of 19 people and deals with Rapid Alert System for Food and Feed (RASFF) notifications, coordinating the information exchange and actions taken in response to such notifications. The Incidents Branch has a database containing comprehensive information on each RASFF notification including communication between and within the CAs, investigation reports etc. There have been two RASFF notifications on PM/PMP since 2007 linked to a UK origin. The MT was provided with details of the investigation of these RASFF notifications-one concerning undeclared milk ingredient in chicken pate and another one concerning residues of nicarbazin in frozen poultry livers. The MT noted that adequate follow up measures had been taken by the UK CAs in both cases.

Conclusions

The system in place for investigation and follow-up of RASFF notifications works adequately.

5.3.7 Salmonella risk in Broilers

The SNCP submitted by the UK was approved by Commission Decision 2008/815/EC.

According to the European Food Safety Authority (EFSA) baseline survey on the prevalence of *Salmonella* in broiler flocks of Gallus gallus in the EU carried out between October 2005 and September 2006, the percentage of positive flocks in the UK for SE and ST was 0.3% (one flock positive for ST only).

The MT noted that extensive consultation took place between DEFRA acting as a CCA for UK, equivalent CAs in UK regions, main delivery partners within the SNCP (AHA and Veterinary Laboratories Agency (VLA)) and farmer associations concerning implementation of SNCP.

Although with some delay, UK legislation (see second paragraph of Chapter 5.1.) implementing Regulation (EC) No 2160/2003 and Regulation (EC) No 646/2007 has been approved. Furthermore, several internal instructions/operational manuals for the CA, comprehensive guidance documents for farm operators, leaflets and articles in farming press have been issued in relation to implementation of SNCP.

The requirements of SNCP applies to all operators except holdings with less than 2000 chickens present at any time, where the operator supplies small quantities direct to the consumer or via local retailers which only supply the final consumer or where all production is for private domestic use only. This exemption is permitted by Regulation (EC) No 2160/2003, Article 1.3. and Commission Regulation (EC) No 199/2009.

According to information provided by DEFRA, there were 1002, 68, 97 and 325 holdings (information extracted in June 2008 for GB) with more than 5000 broilers present in England, Wales, Scotland and NI respectively. The CCA decided to sample each year on a random basis (holding size and geographical distribution being taken into account) at least 10% of holdings with more than 5000 birds. In addition, the CA decided to sample inter alia:

- all other flocks on a holding after positive result for SE or ST;
- flocks with unknown health status;
- all flocks on holding if test results from post cleansing and disinfection sampling are unclear or return a positive result;
- when applying for a derogation in accordance with paragraph 1(c) of the Annex to Regulation (EC) No. 646/2007;
- on a risk basis each time the CA considers it necessary.

According to information provided to the MT by DEFRA and DARD NI, by October 2009 77 and 28 official samples had been taken from a total of 129 and 35 planned for the year in GB and NI respectively with no positive laboratory results for SE and ST. The MT noted that official sampling only began in July 2009. The CAs in NI and England explained that this late start occurred due to delay in adopting national enabling legislation to control *Salmonella* in broilers.

During official sampling in farms, the own check analyses records are checked. The MT was provided with evidence of this concerning GB. However, the MT was informed by Veterinary Services (VS) DARD NI that verification of operator sampling in NI will start only in November 2009. In addition, DEFRA informed the MT that own check analyses records for *Salmonella* within SNCP in GB are checked during official controls, inter alia during visits to farms for veterinary medicine residue controls and compliance with animal welfare requirements (both started in August in relation to *Salmonella* own check records verification). A uniform checklist is provided for these checks. Estimated combined number of checks so far in 2009 is approximately 420. As MT was informed by VS DARD NI that no such official checks to verify implementation of own check sampling have been carried out in 2009 in NI.

In general, the MT noted that DEFRA has comprehensive data including information on implementation of official sampling, verification of own check analyses during official sampling and monitoring of actions taken on *Salmonella* positive (in particular SE and ST) cases in GB. However, CA data on implementation of own check tests is limited to information on *Salmonella* (including SE and ST) positive samples and general data on own check samples analysed in laboratories.[2] There is a lack of information on the number of flocks subject to testing and tested by farm operators. This makes it difficult to evaluate progress made on implementation of the SNCP and for the SNCP to be reviewed in line with Article 5.3 (d) of Regulation (EC) No 2160/2003.

According to DEFRA and VS DARD NI own check sampling began in January 2009. Within the SNCP, DEFRA collects information on a monthly basis from authorised private and VLA laboratories on the number of composite samples tested, total number of *Salmonella* positive tests and five *Salmonella* serovars including SE and ST. In GB, four flocks tested positive for SE and one flock positive for ST through FBO sampling between January and October 2009. In NI no flocks tested positive for SE or ST during FBO sampling in the first quarter of 2009. In GB when a case of *Salmonella* positive results arises, notably for SE and ST, DEFRA is informed, collects the relevant data and monitors the situation and actions taken in line with established CA procedures.

The MT visited two broiler farms. In one NI farm visited by the MT, the farm operator stated that own check sampling began in January 2009, however, laboratory analyses records are kept by the farm consultant. According to the farm operator, he would be informed in cases of *Salmonella* positive results. However, under Point 6 of CSBO NI "the occupier must record the result of each test when it is received from the laboratory". No sampling records are kept at farm level. The MT noted that boot swabs sample taken by operator the previous day was at still at the farm, however, the sample's label did not indicate the precise time of sampling and as a result it was not possible to verify if the requirement to send samples to the laboratory within 25 hours (Commission Regulation (EC) No 646/2007, Annex, Point 3.1., paragraph 1) was respected. The operator explained to the MT that this delay in sending the samples was caused by emergency (strike in post offices). The operator had the necessary sampling kit and demonstrated sampling which was correctly carried out.

In another farm visited in England, sampling records and some examples of laboratory analyses results were provided to the MT on sampling carried out since January 2009. The information provided in accompanying documents was limited to sampling date and house. The precise sampling time and sampling type including sample units were not indicated;

2 In their comments to the draft report DEFRA provided information about current means in place to monitor own check tests using information from approved laboratories and taking into account broiler production trends. In addition, DEFRA informed about the means planned to be used to enhance monitoring of SNCP implementation in broilers.

therefore it was not possible for the MT to verify the compliance of sampling with the requirements of Regulation (EC) No 646/2007, Annex, Point 2, paragraph 1 and Point 3.1., paragraph 1, in particular concerning sampling material taken and samples delivery time to laboratory.[3] When reviewing laboratory analyses documentation on tests carried out in January 2009, the MT noted that laboratory tested litter samples, which is in contravention to Regulation (EC) No 646/2007, Annex, Point 2, paragraph 1. The operator admitted that sampling in accordance with the requirements of Regulation (EC) No 646/2007 had only begun in March 2009. The MT noted that the VLA visited the farm after an own check sample turned out to be positive for SE. All flocks in the farm were sampled and an investigation was made covering history of incidence, husbandry systems applied, biosecurity and pest control issues.

Conclusions

Although with some delay, official sampling within SNCP in broilers is being implemented. Own check sampling is in general implemented, however, with some deficiencies in relation to the sampling protocol and recording of sampling procedures in contravention to Regulation (EC) No 646/2007, Annex, Point 2, paragraph 1 and Point 3.1., paragraph 1. Current CA data on own check sampling implementation does not provide sufficient information on the number of flocks subject to testing and tested which is not fully in line with Article 5.3 (d) of Regulation (EC) No 2160/2003 and therefore not an effective tool to ensure that all flocks subject to sampling within the SNCP in broilers are sampled in line with Regulation (EC) No 646/2007. There was no verification of own check sampling at farm level in NI this year.

5.4 Laboratories

Legal requirements

Articles 11 and 12 of Regulation (EC) No 882/2004.

Findings

Information on laboratories involved in official and own check analyses is provided in Chapters 1.4 and 3.4 of Part I of the Report.

The MT was informed that all official control laboratories, including those testing microbiological parameters, designated by the FSA are required to be accredited and audited by UK Accreditation Service (UKAS – the designated National Accreditation Agency for the UK). The agreed accreditation requirements and the assessment and audit of the laboratories conducted by UKAS are set out in an agreement between the FSA and UKAS. In the event that a UKAS audit identifies any serious non-compliances with agreed performance and accreditation standards, this is reported to the FSA. In 2008 no such non-compliances were reported. The list of these official control laboratories is available on the internet.

The MT visited one laboratory testing own check samples for microbiological analyses including *Salmonella* spp., *Campylobacter* spp., *E.coli*, coagulase positive *Staphylococcus*, *Listeria* spp. etc. The laboratory is accredited to ISO 17025:2005 standard inter alia for the above mentioned analyses. The laboratory staff provided the MT with evidence of regular participation in ring tests including *Salmonella* spp., *E.coli* and *Listeria* spp with adequate results. Regular internal quality

3 In their comments to the draft report DEFRA informed that amendments to national legislation to require recording sampling time on the sample submission form would be made.

tests are carried out.

The MT noted that the testing method (In-House Method MP 23 by ELISA technique using RayAl kit) instead of the reference method (EN/ISO 6579) specified in Regulation (EC) No 2073/2005, Annex I, Chapter II, Point 2.1.5. was used to detect *Salmonella* spp. in neck skin samples of broiler carcasses. Although requested, the MT has not been provided with the information which proves that this method was validated against the reference method or validated according to internationally accepted protocols as required by paragraphs 3 and 4, Point 5, Article 5 to Regulation (EC) No 2073/2005. Furthermore, the laboratory staff were not familiar with the requirements of Regulation (EC) No 2073/2005, in particular, regarding analytical sampling methods and use/validation of alternative methods.

Conclusions

The CA has designated laboratories to carry out the official control analyses taking into account requirements of Article 12 of Regulation (EC) No 882/2004. The CA is involved in the supervision of these laboratories. However, the own check analyses for *Salmonella* in neck skin samples of broiler carcasses are carried out using test methods which have not been validated against the reference method or validated according to internationally accepted protocols as required by paragraphs 3 and 4, Point 5, Article 5 to Regulation (EC) No 2073/2005.

6 Overall Conclusions

There is a comprehensive and well documented system of regular official controls of PM/PMP establishments. The system, which is subject to internal audits, works effectively. However, there are some weaknesses in relation to establishment approval procedure, AMI in SHs and own check *Salmonella* analyses in poultry SHs.

SNCP in broilers is implemented by the CA and operators, although with some delays in official sampling. There are weaknesses in the monitoring of operator sampling.

7 Closing Meeting

During the closing meeting held in London on 29/10/2009, the MT presented the findings and preliminary conclusions of the mission to the CAs.

During this meeting, the CAs acknowledged the findings and preliminary conclusions presented by the MT. The CAs provided some additional information on verification of own check sampling in GB as well as assurances on compliance with establishment administrative approval procedure. The FSA pointed out that that Article 5 of Regulation (EC) No 2073/2005 allows some flexibility to FBOs to use sampling and testing procedures and alternative analytical methods.

8 RECOMMENDATIONS

The CA should provide Commission services with an action plan, including a timetable for its completion, within one month of receipt of the report, in order to address the following recommendations.

N°.	Recommendation
1.	The CA should ensure that granting of a full approval is carried out within the timeframe foreseen in Article 31(d) of Regulation (EC) No 882/2004.
2.	The CA should ensure that OVs carry out inspection tasks in SHs in accordance with paragraph 5, Chapter IV, Section II of Annex III to Regulation (EC) No 853/2004.
3.	The CA should ensure that OVs carry out AMI in SHs in conformity with Point 1(a), Part B, Chapter II, Section I, Annex I to Regulation (EC) No 854/2004.
4.	In order to comply with the requirements of Annex II to Regulation (EC) No 852/2004 and Annex III to Regulation (EC) No 853/2004, the CA should ensure that the deficiencies found by the MT are corrected in the establishments visited and are not present in other approved ones.
5.	The CA should ensure that operators take samples for Salmonella in poultry carcasses in line with paragraph 6, Chapter 3.1, Annex I to Regulation (EC) No 2073/2005.
6.	The CA should ensure that the sampling protocol used is in line with Regulation (EC) No 646/2007, Annex, Point 2 and that the information recorded for each samples permits verification of the implementation of this Regulation.
7.	The CA should consider gathering the necessary data concerning broiler flocks in order to be able to evaluate the progress made under the SNCP, and for the SNCP to be reviewed, in line with Article 5.3 (d) of Regulation (EC) No 2160/2003.
8.	The CA should ensure that own check analyses for Salmonella in neck skin samples of broiler carcasses are carried with testing methods which are validated against reference method or validated according to internationally accepted protocols as required by paragraphs 3 and 4, Point 5, Article 5 to Regulation (EC) No 2073/2005.

The competent authority's response to the recommendations can be found at:

http://ec.europa.eu/food/fvo/ap/ap_gb_2009-8072.pdf

Annex 1 - Legal References

Legal Reference	Official Journal	Title
Dir. 96/23/EC	OJ L 125, 23.5.1996, p. 10-32	Council Directive 96/23/EC of 29 April 1996 on measures to monitor certain substances and residues thereof in live animals and animal products and repealing Directives 85/358/EEC and 86/469/EEC and Decisions 89/187/EEC and 91/664/EEC
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
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. 2160/2003	OJ L 325, 12.12.2003, p. 1-15	Regulation (EC) No 2160/2003 of the European Parliament and of the Council of 17 November 2003 on the control of salmonella and other specified food-borne zoonotic agents
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	Regulation (EC) No 882/2004 of the European Parliament and of the Council of 29 April 2004 on

Legal Reference	Official Journal	Title
	re-published in OJ L 191, 28.5.2004, p. 1	official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules
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. 2076/2005	OJ L 338, 22.12.2005, p. 83-88	Commission Regulation (EC) No 2076/2005 of 5 December 2005 laying down transitional arrangements 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 and amending Regulations (EC) No 853/2004 and (EC) No 854/2004
Reg. 646/2007	OJ L 151, 13.6.2007, p. 21-25	Commission Regulation (EC) No 646/2007 of 12 June 2007 implementing Regulation (EC) No 2160/2003 of the European Parliament and of the Council as regards a Community target for the reduction of the prevalence of Salmonella enteritidis and Salmonella typhimurium in broilers and repealing Regulation (EC) No 1091/2005
Reg. 199/2009	OJ L 70, 14.3.2009, p. 9-10	Commission Regulation (EC) No 199/2009 of 13 March 2009 laying down a transitional measure derogating from Regulation (EC) No 2160/2003 of the European Parliament and of the Council, as regards direct supply of small quantities of fresh meat derived from flocks of broilers and turkeys

Annex 1

UK Response to the Draft Report of a specific audit carried out in the United Kingdom from 20 to 29 October 2009 on the systems in place to control the *Salmonella* risk in broilers in the context of a general audit

DOCUMENT DG(SANCO) 2009-8072 – MR DRAFT

1. Defra notes the comments made by the Mission Team in the Report on the implementation of the Broiler National Control Programme.

Comments on points of accuracy:

3. We have no points of accuracy to note.

DOCUMENT DG(SANCO) 2009-8072- MR DRAFT:

4. The following comments aim to clarify Defra's position in respect of implementation of the Broiler National Control Programme.

5. ***Section 5.3*** *"Official controls of production and placing on the market" and 5.3.1 entitled 'Approval procedures'* and *'Findings',* Line 12 of paragraph 4 has the following statement *" The MT was informed that farms are registered on request without verification of any data supplied by the operator.'*

5.1 **Defra's response:** Defra would request that consideration is given to the addition of the following text at the end of the sentence referred to above in paragraph 4*:* Although there is no formal verification of data at the time of registration, when Animal Health staff have reason to visit the holding for any purpose (eg. cross compliance checks, visits for welfare inspections, disease investigations etc) they will check the details from the GB Poultry Register against the details at the farm and amend the GB Poultry Register if necessary. Also**,** there is a rolling 12 monthly update cycle for registrants on GBPR i.e. they get a notification letter every year providing a copy of the information they have registered and requesting an update to their details or nil return in response. It is a legal requirement to register, failure to do so is an offence punishable by a fine or imprisonment and is enforced by Local Authorities.

6. **Paragraph 6 of section 5.3.7** entitled '*Salmonella risk in Broilers'* reported details of the sampling that the Competent Authority carry out.

6.1. **Defra's response:** Defra requests that the Commission add two further bullet points to the list of sampling carried out by the Competent Authority, to state:

- "all flocks on holding if test results from post cleansing and disinfection sampling are unclear or return a positive result" and
- "when applying for a derogation in accordance with paragraph 1(c) of the Annex to Regulation (EC) No. 646/2007"

7. ***P*aragraph 9 of section *5.3.7****, the* fourth line entitled *'Salmonella risk in Broilers'* stated that ... "*However, CA data on implementation of own check tests is limited to information on Salmonella (including SE and ST) positive samples and general data on own check samples analysed in laboratories. There is a lack of information on the number of flocks subject to testing and tested by farm operators. This makes it difficult to evaluate progress made on implementation of the SNCP and for the SNCP to be reviewed in line with Article 5.3 (d) of Regulation (EC) No 2160/2003.'*

7.1 **Defra's response:** Defra requests that the following points are noted in response to the comments in the paragraph 9 of section 5.3.7: Monthly returns are received from all approved laboratories that carry out testing (operators can only send *Salmonella* NCP

samples to approved laboratories). Flock identification is given and as broilers are only tested statutorily under the National Control Programme within 3 weeks of slaughter, the number of statutory samples tested by approved laboratories is considered equivalent to the number of operator own checks carried out monthly. Broiler production levels in the UK follow a relatively consistent trend on a monthly basis throughout the year and therefore these figures are monitored for any significant changes, requiring appropriate follow-up. Since this is the first year of implementation of the NCP, it is expected that monitoring of production trends and returns on statutory sampling received from private laboratories will be refined for the second year of implementation. Further consideration will also be given to other methods for collecting data on the total number of broiler flocks in production in the UK during the year. Following the comments received from the Mission Team on the aspects of verification of operator own checks, Defra is currently working closely with the Food Standards Agency and Animal Health to implement a method of verifying that *Salmonella* testing has been carried out in broiler flocks falling within the scope of Regulation (EC) No. 2160/2003 through revision of the Food Chain Information document required under Regulation (EC) 853/2004, Annex II and Regulation (EC) No. 854/2004, Annex 1, Section 1, Chapter IIA and Section II, Chapter II. The document is currently undergoing revision to include a specific statement confirming that *Salmonella* testing had been carried out in the flock presented for slaughter and processes are being finalised on how nil returns will be reported back to the Animal Health Agency for follow-up official visits on farm.

8. **The fifth line of paragraph 12 of section *5.3.7*** entitled *'Salmonella risk in Broilers'* stated that- *"The precise sampling time and sampling type including sample units were not indicated; therefore it was not possible for the MT to verify the compliance of sampling with the requirements of Regulation (EC) No 646/2007, Annex, Point 2, paragraph 1 and Point 3.1. paragraph 1, in particular concerning sampling material taken and samples delivery time to laboratory. When reviewing laboratory analyses documentation on tests carried out in January 2009, the MT noted that laboratory tested litter samples, which is in contravention to Regulation (EC) No 646/2007, Annex, Point 2, paragraph 1.*

8.1 **DARD NI's response**: "The Mission Team raised the issue of not recording the precise time a sample was taken. The Control of *Salmonella* in Broilers Order (CSBO) (NI) 2008 requires the date of sampling to be recorded but not the exact time. The exceptional circumstances of the Postal strike highlighted the issue and in normal practice this failing would be extremely infrequent.

8.2 **Defra's response:** Defra notes the Mission Team's comments in paragraph 12 of section 5.3.7 and would like to make the following points: - the sampling unit is the "flock" as defined in Article 2, paragraph 3(b) of Regulation (EC) No 2160/2003. Clear guidance on this matter has been provided to the industry in Part II of the Defra *"Guide to the National Control Programme of Salmonella in broiler flocks" published in 2009.* (A copy of this Guide was included in the pack of information provided to the Mission Team during the visit). The type of sample is not required to be specified since only one sample type – boot swabs – is allowed under the NCP requirements. Official samples are submitted on a dedicated submission form, providing differentiation between type of sample in terms of operator versus official samples. The day of sampling but not the time is reported on the sample submission form because delays are not anticipated due to the timing of postal deliveries in the UK. If the date of sampling recorded on the submission form is not the date of the previous day, the sample is not tested as per the requirements of the legislation. A requirement to record sampling time was previously seen as an unnecessary burden on the producer and Competent Authority officials taking the official samples. However, since this point has been raised by the Mission Team and, it is considered, will provide greater precision in confirming adherence to the requirements of the legislation, amendments to national legislation to require recording of the sampling time on the sample submission form will be made.

DG (SANCO) 2009-8072 – comments on the draft reports for the Food Safety – Poultry Meat FVO Mission.

DG(SANCO) 2009/8072 Mission Report (Draft Horizontal Findings or Draft Sectoral Report)	Page / paragraph / text reference	CA comment
Draft Sectoral Report	Page 3, 5.2, text in second paragraph under Findings: "Royal Society of Public Health prepared educational programme entitled "Level 2 Award for Proficiency in Poultry Meat Inspection". It is designed to provide the necessary skills and to assess the proficiency of PIAs in carrying out poultry post mortem checks. This programme is available since 2009. According to the MHS at present there is no approved guidance document concerning authorization of new PIAs by the CA. Newly graduated persons willing to start work as PIAs would have to go through an authorisation procedure in an establishment. The MT noted that PIA's training was carried	Suggest replacing the text with the following which provides a more accurate description: *"There are two awarding bodies providing the necessary training and examinations, achieving nationally recognised Level 2 Award for Proficiency in Poultry Meat Inspection. Individual premises can also be recognised as training centres. Newly qualified PIAs willing to start work as PIAs must be authorised by the MHS. The process of authorisation is initiated by the plant OV. Guidance documentation relating to the authorisation of new PIAs by the CA is in the process of being developed."*

	out by Official Veterinarians (OVs) in establishments visited taking into account PIA's duties."	
Draft Sectoral Report	Sentence following on from above paragraph (p3, 5.2, Findings): "The MT noted that, in establishments visited, Poultry Meat Inspectors (MIs), who can perform the same tasks as an OV other than the ante-mortem inspection, appeared adequately trained."	Replace this sentence with the following: *"The MT noted that, in the establishments visited, PMHIs can perform post-mortem inspection and those who are assisting the OV in performing auditing tasks appear to be adequately trained"*
Draft Sectoral Report	Page 5 - 6, under ante mortem inspection (AMI): "The MT was informed that at least one lorry from each flock is assessed by the OV during AMI. However, this is not fully in compliance with Annex I, Section I, Chapter II, Part B, Point 1(a) of Regulation (EC) No 854/2004 which requires that OV carries out an AMI on all animals before slaughter. Records were available to the MT."	It is impractical and unnecessary to conduct ante mortem inspection on every single animal in every crate and lorry. Seeing at least one lorry with live birds as a representative of the flock is considered to be sufficient for satisfactory AMI as diseases are flock-related. Each lorry is checked by the FBO animal welfare officer at every plant upon arrival, records kept and any problems are notified to the OV on site. Furthermore, a key part of AMI is FCI, which is compiled on a flock basis and augments inspections conducted at the slaughterhouse.

DG (SANCO) 2009-8072 – comments on the draft reports for the Food Safety – Poultry Meat FVO Mission.

Draft Sectoral Report	Page 6, second paragraph under post-mortem inspection: "The CA stated that a MI can do the same tasks as an OV except of AMI."	Amend this sentence to read as follows: *"PMHIs can perform post mortem inspection and assist the OV in performing auditing tasks."*
Draft Sectoral Report	Page 6, final paragraph: "In general AMI and PMI were adequately carried by the CA apart from the deficiencies noted by the MT during AMI. However, poultry carcases were washed after evisceration, before the PMI, preventing the OV from assessing properly the possible faecal contamination in contravention of paragraphs 5 and 6, Chapter IV, Section II of Annex III to Regulation (EC) No 853/2004."	Post mortem inspection is carried out in accordance with hygiene regulations. The vast majority of poultry carcases in modern slaughterhouses are washed/sprayed throughout processing prior to post mortem inspection. Contaminated carcases are rejected in accordance with the instructions on condition cards.
Draft Sectoral Report	Page 8, 5.3.4, Conclusion states that there is "no specific sampling programme for microbiological parameters for PM/PMP at establishment level" and that the sampling programme in place is at retail level.	This does not reflect the situation in the premises visited as we do collect food samples for microbiological and chemical testing at the establishment level and the text should be adjusted accordingly.

[redacted]
Sent: Tuesday, February 16, 2010 11:52 AM
[redacted]
Subject: RE: Kind request for supporting information

[redacted]

I suggest the following text which should clarify the present situation across the various LAs in the UK:

The Framework Agreement for all Local Authorities in the UK requires that each LA shall set up, maintain and implement a documented sampling policy and programme. This programme should be in accordance with any centrally issued or relevant guidance and the relevant Food Safety Act Code of Practice, whilst taking into account the nature of the food and feeding stuffs establishments within its remit. This includes a requirement to conduct sampling and take enforcement action as necessary where sample results are not considered to be satisfactory.

The Framework Agreement can be found below:

http://www.food.gov.uk/multimedia/pdfs/frameworkjuly04.pdf

I shall try and gather some further detail if possible but hopefully this will be suitable

Thanks,

[redacted]

[redacted]
Sent: Tuesday, February 16, 2010 4:52 PM
[redacted]
Subject: RE: Kind request for supporting information

[redacted]

Further to what we discussed, I suggest the following two sentences...

The control and enforcement activities of local authorities are monitored centrally, including the collection of data on sampling conducted by local authorities. Much of this sampling data is input by the local authorities into the central UKFSS system.

With regard to supporting evidence and information, the following should prove useful. The first document is a report on LA enforcement and has some data on sampling and the second is our 2008 report on the MANCP (6.18-6.22 in particular):

http://www.food.gov.uk/multimedia/pdfs/board/info090201.pdf

http://www.food.gov.uk/multimedia/pdfs/enforcement/ncpannualreport2008.pdf

Thanks,

[redacted]

N°.	*Recommendation*	*Action Proposed by the Competent Authority*
1	The CA should ensure that granting of a full approval is carried out within the timeframe foreseen in Article 31(d) of Regulation (EC) No 882/2004.	The full evaluation process, including plant visits, necessary for an approval had taken place at the plant but an administrative oversight meant that the documentation had not been issued. The administrative systems have been enhanced to prevent a recurrence.
2	The CA should ensure that OVs carry out inspection tasks in SHs in accordance with paragraphs 5 and 6, Chapter IV, Section II of Annex III to Regulation (EC) No 853/2004.	Post mortem inspection tasks are carried out in accordance with Hygiene Regulations. The vast majority of poultry carcases in modern slaughterhouses are washed / sprayed throughout the process prior to post mortem inspection. Contaminated carcases are rejected in accordance with the instructions on condition cards.
3	The CA should ensure that OVs carry out AMI in SHs in conformity with Point 1(a), Part B, Chapter II, Section I, Annex I to Regulation (EC) No 854/2004.	It is impractical and unnecessary to carry out ante mortem inspection of each and every animal in the crates and every lorry from the same flock. Inspecting a minimum of one lorry with live birds as a representative of the flock is considered to be sufficient for satisfactory AMI, since relevant diseases are flock related. Each lorry is first checked by the FBO's animal welfare officer, at every plant at the time of arrival, records kept and any issue is immediately notified to the OV on site. Furthermore, an integral part of AMI is FCI, which is compiled on a flock by flock basis and is supplemented by inspections carried out at the slaughterhouse.
4	In order to comply with the requirements of Annex II to Regulation (EC) No 852/2004 and Annex III to Regulation (EC) No 853/2004, the CA should ensure that the deficiencies found by the MT are corrected in the establishments visited and are not present in other approved ones.	The issue found by the MT at the premises was addressed following the visit.
5	The CA should ensure that operators take samples for Salmonella in poultry carcasses in line with paragraph 6, Chapter 3.1, Annex I to Regulation (EC) No 2073/2005.	Guidance on how to take samples according to the regulation is provided. OV's will be reminded to ensure the guidance is being followed.

N°.	*Recommendation*	*Action Proposed by the Competent Authority*
6	The CA should ensure that the sampling protocol used is in line with Regulation (EC) No 646/2007, Annex, Point 2 and that the information recorded for each samples permits verification of the implementation of this Regulation.	Defra: Defra notes the Mission Team's (MT) comments in paragraph 12 of section 5.3.7. The requirement to record sampling time may provide enhanced precision in confirming adherence to the requirements of the legislation. Therefore suitable amendments to the national legislation to require recording of the sampling time as well as sampling date on the sample submission form will be made. • Review of existing national legislation on *Salmonella* National Control programmes to consider inclusion of the requirement for time of sample taking to be recorded. Defra is working closely with the FSA, the Meat Hygiene Service, Animal Health and industry to improve the Food Chain Information (FCI) document in order to enable slaughterhouse verification of full implementation of the requirements of the *Salmonella* National Control Programme (SNCP). The document is currently undergoing revision to include a specific statement confirming that *Salmonella* testing had been carried out in the flock presented for slaughter and processes are being finalised on how lack of provision of testing information will be reported back to the Animal Health Agency for follow-up official visits on farm. Revised guidance notes to accompany the FCI paperwork are also in development. Defra notes that the Mission Team acknowledge that comprehensive guidance had been provided to the industry regarding the implementation of the NCP. However we will remind industry at the regular monthly NCP stakeholder meetings of their obligation to follow the sampling protocol. Further articles providing information on the requirements of the SNCP will be published in the farming press in the near future and on an annual basis hereafter to remind operators of the legislative requirements.

N°.	*Recommendation*	*Action Proposed by the Competent Authority*
		DARD: The FVO inspectors have commented, in regard to the NI farm visited that "the operator had the necessary sampling kit and demonstrated sampling which was correctly carried out." DARD accepts the point that the results of operator sampling were not kept by the occupier on the holding and is taking steps to ensure that in future the laboratory results are kept on the holding to permit verification of the implementation of this Regulation. • Discussed at the stakeholder meeting on 21st January 2010. The FVO inspectors raised the issue of not recording the precise time a sample was taken. The Control of *Salmonella* in Broilers Order (CSBO) (NI) 2008 requires the date of sampling to be recorded but not the exact time. The exceptional circumstances of the postal strike highlighted the issue and in normal practice this failing would be extremely infrequent. • Verification of operator sampling in NI commenced in November 2009. This work has now been completed with satisfactory results.
7	The CA should consider gathering the necessary data concerning broiler flocks in order to be able to evaluate the progress made under the SNCP, and for the SNCP to be reviewed, in line with Article 5.3 (d) of Regulation (EC) No 2160/2003.	Defra: Defra can confirm that verification of data concerning broilers flocks in production in the UK in order to evaluate the progress of the NCP takes place via the following means (see points 1-3 below): 1. The GB Poultry register- this system provides holding level data. 2. The monthly approved laboratory testing returns provide flock level data. The total number of statutory *Salmonella* tests carried out in flocks within the 3 weeks prior to slaughter will indicate the total number of broiler flocks tested under the requirements

N°.	*Recommendation*	*Action Proposed by the Competent Authority*
		of the SNCP. • This information will be collated for the annual report to Commission 3. Denominator data on number of flocks eligible for testing under the requirements of Regulation (EC) No 2160/2003 is collected at the time of visits to farms for verification of operator testing. The returns (forms SL47) will be collated annually for 2009 for the annual report to the Commission on implementation of the SNCP. However, following the recommendation from the MT these forms will be collated on a quarterly basis from the start of 2010 to determine number of flocks subject to testing for means of monitoring progress. In addition the following will be implemented (see points 4-6 below): 4. Improvements in the Food Chain Information (FCI) document will provide verification checks of operator testing for *Salmonella* (where appropriate). Defra will investigate whether central collation of this data is practical/possible (including the feasibility of linking slaughter batches with flocks as the epidemiological unit of the SNCP) and whether this will deliver improved precision in monitoring the progress with the SNCP as well as the already acknowledged improvement in compliance monitoring. 5. Defra will consult the delivery partners and industry stakeholders regarding collection of broiler flock denominator data from industry to facilitate monitoring of the SNCP. Data available, feasibility of collection, accuracy of data held for the flock level denominator will be investigated.

N°.	*Recommendation*	*Action Proposed by the Competent Authority*
		• To finalise for annual report to the Commission on implementation of the SNCP 31st May 2010. 6. Detail on enforcement action and the timing of this action to be added to the Animal Health Agency's Operations Manual for field staff. DARD has a database containing all the broiler holdings and the results of official sampling on these holdings. This data may be used to allow for progress under the provisions of the Regulation to be evaluated and reviewed.
8	The CA should ensure that own check analyses for Salmonella in neck skin samples of broiler carcasses are carried out with testing methods which are validated against reference method or validated according to internationally accepted protocols as required by paragraphs 3 and 4, Point 5, Article 5 to Regulation (EC) No 2073/2005.	Information on the use of alternative methods will be included in a future revision of the guidance and OV's will be reminded to check the laboratory method details.