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Final report

EFTA Surveillance Authority mission to

NORWAY

from 14 to 23 November 2011

regarding application of EEA legislation related to the safety of food of animal origin, in particular farmed and wild game meat

Please note that comments and information from the Norwegian competent authorities on the corrective actions already taken and planned by the Norwegian competent authorities are included in Annex 4 and referred to in footnotes in *underlined italic print* in the body of the report.

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Executive Summary

This report describes the outcome of a mission carried out by the EFTA Surveillance Authority in Norway from 14 to 23 November 2011.

The objective of the mission was to verify that official controls related to the production and placing on the market of farmed and wild game meat were carried out in compliance with the European Economic Area legislation.

The mission team found that the situation in Norway concerning the placing on the market of farmed and wild game meat and products thereof is in general in line with the requirements laid down in the Food Hygiene Package and the related legislation.

Since the implementation of the Food Hygiene Package in Norway, an appropriate effort has been put in place for the training of hunters. However, a certain number of shortcomings and inconsistencies have been identified by the mission team in the production chain of game meat and the correspondent official controls carried out by the Norwegian Food Safety Authority (NFSA).

Several national measures have been implemented but not all have been notified to the Authority as required by the Food Hygiene Package legislation.

The mission team met motivated NFSA colleagues however, a lack of training, in particular concerning how to assess HACCP plans, was observed. In addition, a lack of coordination within the NFSA was noted concerning organisation of some aspects of game meat control.

Some establishments have been granted full approval without complying with all the relevant requirements of the food law, in particular as regards incomplete HACCP plans. In addition, the list of establishments publicly available on the NFSA website was not up-to-date.

General and specific hygiene requirements were not always fulfilled by the establishments, including identification marking, labelling and reliable traceability. Not all of these inconsistencies were identified by the NFSA.

In relation to organisation of official controls, a risk based approach still needs to be established for the game meat sector.

Some non-compliances in Trichinella testing were detected by the mission team. A contingency plan concerning Trichinella had not been yet prepared.

The report includes a number of recommendations addressed to the Norwegian competent authority aimed at rectifying the identified shortcomings and enhancing the control system in place.

1 Introduction

The mission took place in Norway from 14 to 23 November 2011. The mission team comprised three inspectors from the EFTA Surveillance Authority (the Authority).

The opening meeting was held with representatives of the Ministry of Agriculture and Food and the Norwegian Food Safety Authority (NFSA) on 14 November at the NFSA head office in Oslo.

This was the first mission carried out by the Authority regarding farmed and wild game meat in Norway since the implementation of the “Food Hygiene Package” on 1 May 2010.

At the meeting, the mission team confirmed the objectives and the itinerary of the mission. The Norwegian representatives provided additional information to that set out in the reply to the Authority's pre-mission questionnaire.

Throughout the mission, the mission team was accompanied by representatives of the NFSA head office together with representatives of the relevant regional and district offices. The itinerary included visits to establishments processing farmed and wild game meat.

A final meeting was held with representatives of the NFSA and the Ministry of Health and Care Services in Oslo on 23 November 2011.

The abbreviations used in the report are listed in Annex 1.

2 Objectives of the mission

The following main European Economic Area (EEA) Acts and related EEA legislation fall within the scope of the mission:

- a) *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;*
- b) *Regulation (EC) No 178/2002 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;*
- c) *Regulation (EC) No 852/2004 on the hygiene of foodstuffs;*
- d) *Regulation (EC) No 853/2004 laying down specific hygiene rules for food of animal origin; and*
- e) *Regulation (EC) No 854/2004 laying down specific rules for the organisation of official controls on products of animal origin intended for human consumption.*

The objective of the mission was to assess the Norwegian competent authorities' application of the above mentioned legislation and additional legislation referred to in Annex 2 to this document. The mission covered all stages of farmed and wild game meat production and processing, with a particular focus on the following areas:

- a) Official controls related to food business operators' compliance with general and specific rules on the hygiene of food of animal origin and in particular farmed and wild game meat;
- b) The implementation of these rules by the food business operators.

The meetings with the competent authorities and the visits during the mission are listed in Table 1.

Table 1: Competent authorities and sites visited during the mission

Meetings/sites visited		Comments
Competent authority	2	Initial and final meetings at the NFSA head office in Oslo.
	4	Meetings at NFSA district offices with representatives of the region and district offices.
Slaughterhouses	3	One approved for several domestic species, farmed reindeer and wild boars; one approved for several domestic species and also approved as game handling establishment; one approved for farmed deer and also approved as wild game control post.
Cutting plant	1	Processing meat of farmed reindeer slaughtered in one of the slaughterhouses visited by the mission team.
Game handling establishments	2	One approved also for several domestic species and one approved only for wild game.
Farm	1	A red deer and fallow deer farm.
Laboratories analysing official samples for <i>Trichinella</i>	2	One district office of the NFSA had laboratory facilities in their office; one private laboratory.
Others	2	The Norwegian Forestry Extension Institute (<i>Skogbrukets kursinstitutt</i> , SKI) and the Norwegian Red Deer Centre. Both these institutions organise, amongst other activities, training for hunters.
Game control posts	2	One was in the same facilities as an approved slaughterhouse for farmed deer. For a description of game control posts, please see Chapter 5.2.2.

3 Legal basis for the mission

The legal basis for the mission was:

- a) Point 4 of the Introductory Part of Chapter I of Annex I to the EEA Agreement;
- b) Article 1(e) of Protocol 1 to the Agreement between the EFTA States on the Establishment of a Surveillance Authority and a Court of Justice (Surveillance and Court Agreement);
- c) *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*; and
- d) 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*.

4 Background

4.1 Previous missions

The last mission in Norway concerning the production and placing on the market of farmed and wild game meat was carried out in October 2006. The final report from this mission is accessible on the website of the Authority, www.eftasurv.int. The Authority concluded on a number of issues in the report and subsequently the competent authorities informed the Authority of corrective measures taken, or to be taken.

4.2 Information on production and trade of farmed and wild game and on hunters' organizations

According to information provided by the NFSA in its reply to the pre-mission questionnaire of the Authority, in Norway reindeer are not kept in farms but in areas where they roam almost freely. Finnmark county, the main area for keeping tame reindeer, has 70 % of the total population of reindeer in Norway, estimated between 240 000 and 250 000 heads.

Information concerning production and trade of farmed and wild game meat are drawn from Statistics Norway (*Statistisk Sentralbyrå*) and are available in Annex 3. According to the information there has been no export of wild game meat to third countries.

All persons have to pass a hunting proficiency test before being allowed to hunt game in Norway. A national register, the Norwegian Register of Hunters (*Jegerregisteret*) includes everyone who has passed the hunting test and those who have paid the hunting licence fee. There are about 440 000 registered hunters and approximately 200 000 hunters pay the licence fee each year. The Norwegian Register of Hunters, and other information regarding hunting in Norway, are available on the website of Brønnøysund Registers (*Brønnøysundregistrene*).

5 Findings and conclusions

5.1 National legislation

5.1.1 National measures and derogations

Legal requirements

According to Article 13(5) of Regulation (EC) No 852/2004, Article 10(5) of Regulation (EC) No 853/2004 and Article 17(5) of Regulation (EC) No 854/2004 Member States may, without compromising the achievement of the objectives of the above mentioned Regulations, adopt national measures adapting the requirements laid down in Annex II to Regulation (EC) No 852/2004, Annex III to Regulation (EC) No 853/2004 and Annex I to Regulation (EC) No 854/2004 respectively. The adoption of such national measures is subject to notification to the Authority and other EEA Member States.

Findings

On 1 February 2008, Norway notified the Authority of several national measures adapting the requirements of Regulations (EC) No 852/2004, No 853/2004 and No 854/2004. Relevant to the scope of this mission are the national measures on:

- the presence and performance of meat inspection in slaughterhouses with low throughput (notified under DTR 2008/9003/N);

- the health marking of meat from animals that have undergone emergency slaughter (notified under DTR 2008/9006/N); and
- the production and direct placing on the market of small quantities of primary products and wild game meat (notified under DTR 2008/9008/N).

In the notified national measures, it is stated that “*Wild game meat shall be placed on the market only as whole or half carcasses, or roughly cut up*”. The mission team noted that national legislation allows carcasses of wild and farmed deer, that are to be placed on the market, to be cut in maximum eight pieces.

The mission team was informed that square health marks, indicating that the meat may only be placed on the national market, are used in the case of meat from reindeer with levels of radioactive Caesium between 600 and 3000 bq/kg (Norwegian Regulation No 1622/2008, Article 19). This has not been notified to the Authority.

Conclusions

The Norwegian authorities have notified the Authority of several national measures in place as required by Article 13(5) of Regulation (EC) No 852/2004, Article 10(5) of Regulation (EC) No 853/2004 and Article 17(5) of Regulation (EC) No 854/2004.

However, the national measures relating to the use of reindeer meat with levels of radioactive Caesium of between 600 and 3000bq/kg have not been notified to the Authority as required.

5.2 Competent authorities¹

5.2.1 Designation and training of competent authorities

Legal requirements:

Article 4(1) of Regulation (EC) No 882/2004 requires Member States to designate the competent authorities responsible for the official controls set out in the Regulation. Article 4(2)(b) requires that competent authorities shall ensure that staff carrying out official controls are free from any conflict of interest.

Article 6 of the same Regulation requires that staff performing official controls: (a) receive, for their area of competence, appropriate training enabling them to undertake their duties competently and to carry out official controls in a consistent manner and (b) keep up to date in their area of competence and receive regular additional training as necessary.

Findings:

According to information provided by the NFSA in its reply to the Authority’s pre-mission questionnaire, the overall system is equal for official controls in the game meat to that concerning red meat as explained in the Country Profile with the NFSA as the designated competent authority. According to the same information, the control system for wild game meat is based on both Regulation (EC) No 853/2004 and national legislation based on the exemption in Article 1(3)(e) in the same Regulation. Farmed game undergoes official meat control in slaughterhouses.

¹ Further information on the organisation of official controls in Norway is given in the country profile available on the Authority’s website; <http://www.eftasurv.int/internal-market-affairs/fields-of-work/food-safety/country-profiles/>

In one slaughterhouse visited, approved for farmed game, the NFSA officials explained to the mission team that a private veterinarian was hired part-time by the NFSA to carry out official controls if no official veterinarian was available. The same veterinarian was also working as private practitioner, prescribing drugs and treatment, for the farm keeping animals slaughtered in the same slaughterhouse. The mission team noted that the register for ante mortem and post mortem control carried out in the slaughterhouse was signed by the official veterinarian².

During the meetings with several NFSA officials, the mission team was informed that there had been limited training for official veterinarians on the requirements laid down in the Food Hygiene Package in relation to farmed and wild game. In one region a one-day meeting on the topic of game meat was organised in 2010. According to the information provided by the NFSA in its reply to the pre-mission questionnaire of the Authority, the main topic for the 2012 updating courses for officials working with meat control will be game meat.

During several meetings at district offices, the NFSA officials confirmed that they needed to improve their knowledge concerning assessments of HACCP plans. In one region it was explained that it is planned to carry out a training session of two days followed by audits of HACCP plans in 100 establishments in 2012. This is part of a national training and action on HACCP covering all types of food business operators.

Conclusions

Norway has designated competent authorities responsible for the official controls concerning the safety of food of animal origin, in particular game meat in line with the requirements laid down in the Regulation (EC) No 882/2004. However, a possible conflict of interest contrary to the requirements laid down in Article 4(2)(b) of Regulation (EC) No 882/2004 could not be excluded in one establishment visited. The NFSA staff had not yet received all relevant training and was not kept fully up-to-date in their competencies as required by Article 6 of Regulation (EC) No 882/2004, in particular regarding assessment of HACCP plans.

5.2.2 Organisation of official controls, coordination and cooperation within competent authorities

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.

Article 4(5) of Regulation (EC) No 882/2004 requires that when, within a competent authority, more than one unit is competent to carry out official controls, efficient and effective coordination and cooperation shall be ensured between the different units.

Findings

Organisation of official controls, coordination and cooperation within competent authorities are explained in the Country Profile.

² See Annex 4 for comments from the NFSA.

MATS (the NFSA's quality control system) is a tool constructed to co-ordinate and aid the official controls – also on game meat.

The mission team observed in some of the establishments visited that the frequency of official controls appeared to be based on resources available and not a risk basis. It is up to the local level to organise the official controls in their district as there are no instructions/guidelines issued by the NFSA head office on how to carry out risk assessment or set frequencies for official controls in the game meat sector. In one establishment visited, producing meat preparations and minced meat, the district officer informed the mission team that due to lack of resources the previous inspection had been carried out 18 months earlier which was not considered to be sufficient for this particular establishment.

Guidelines were available for risk assessment of establishments with discontinued slaughter. The NFSA officers from one region and the head office informed the mission team that before the establishment of the NFSA in 2003, each establishment was placed in a risk category defining the frequency of inspection.

In one slaughterhouse, the mission team was informed that post mortem inspection of farmed reindeer followed the procedures for domestic sheep and goats. In another slaughterhouse post mortem inspection of red and fallow deer followed the procedures for bovine animals. In both cases, the mission team was informed that the decision on which domestic species was the corresponding to the species of farmed game in question was based on practical experience. No instructions related to official inspection tasks in establishments have been issued by the NFSA head office in order to establish the correspondence between farmed game animals and domestic animals.

One establishment visited by the mission team was registered as a control post for wild game. Registered control posts are sites where the NFSA carry out initial inspection of wild game, replacing such inspections carried out by a trained hunter (see Chapter 5.5.4). Following an inspection by the NFSA in a control post, a square stamp is applied to the carcasses. The square stamp used contain a code with the letter V=*vilt* (game), a numerical code of the district and an identification number. In one district visited the identification number identified the control post, in another district visited it identified the NFSA official (official veterinarian or auxiliary) applying the stamp.

The NFSA head office confirmed that the district officers have been told to continue the system as it is in place awaiting more trained hunters to be available in the country in order to progressively reduce the number of control posts. The head office also confirmed that the need to revise the system of using control posts and square stamps had already been identified by the NFSA.

No instructions have been issued by the NFSA head office on how to carry on sampling and examination of animals other than domestic swine (including wild game meat) concerning *Trichinella* (see chapter 5.5.5).

Conclusions

Full compliance with Article 3 of Regulation (EC) No 882/2004 was not fully ensured since official controls of establishments in the game sector are sometimes based on available resources instead of risk and the frequency cannot in all cases be considered as regular.

Compliance with Article 4(5) of Regulation (EC) No 882/2004 was generally confirmed by the information received and the observations made by the mission team. However, lack of coordination within the competent authorities was observed in relation to risk assessment and certain instructions/guidelines related to official inspection tasks in establishments.

5.3 Hunters and trained persons

Legal requirements

Section IV, Chapter I of Annex III to Regulation (EC) No 853/2004 lays down the requirements concerning training of hunters in health and hygiene.

Findings

According to information provided by the NFSA in its reply to the pre-mission questionnaire of the Authority, some operators in the Norwegian hunting industry established education programs for the purpose of training hunters in health and hygiene. These education programs have been developed and established by the industry organisations themselves with involvement and consultation from the NFSA, and the final education programs have been officially recognized by the NFSA. In agreement with the NFSFA two educational establishments are offering courses in initial examination of wild game to educate trained hunters (or “trained persons” as described in Regulation (EC) No 853/2004, Annex III). Official veterinarians are also involved in teaching some subject areas in these courses. The two educational establishments are the Norwegian Forestry Extension Institute (*Skogbrukets kursinstitutt*, SKI) and the High school of agriculture and farming in Mære. Information on their courses is available on the respective web-sites.

The mission team visited the Norwegian Forestry Extension Institute. Its training activity for hunters started in 2011. However, since 2006 the Institute has cooperated with the NFSFA. Nine educated instructors are temporarily employed by the Institute to provide courses all over the country. 55 courses have been organised in 2011 with 20 to 40 participating hunters/course. Participants should have a minimum of five years' experience and participated in hunting and slaughter of at least 20 animals. Program of the course, as explained to the mission team, covers all the requirements laid down in the relevant legislation. In 2011 it is estimated that more than 2000 hunters took part to these courses.

The mission team also visited the Norwegian Red Deer Centre which, using in part the training material prepared by the Norwegian Forestry Extension Institute, trained around 350 hunters in 2011.

The inspection team noted the professional knowledge and experience in both the Centres visited.

Conclusions:

Training of hunters in health and hygiene provided in Norway fulfil the requirements of Section IV, Chapter I of Annex III to Regulation (EC) No 853/2004.

5.4 Establishments and other issues

5.4.1 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 operators, for reviewing compliance with conditions of registration and for the withdrawal of approvals. The competent authority shall keep the approval of establishments under review when carrying out official controls.

Article 31(1)(c) provides that the competent authority shall only grant approval to establishments that fulfil the relevant requirements of feed or food law. Further to Article 31(1)(b) and (2)(f), the competent authorities shall maintain and keep up-to-date publicly available lists of approved establishments.

Findings

The NFSA is responsible for the approval of food business operators; control posts for wild game are registered by the NFSA. The list of approved establishments is available on the website of the NFSA.

The mission team noted that, in the last amended lists available on the NFSA website concerning meat of farmed game and meat of wild game, one establishment approved on 12 September 2011 was listed. Another establishment, no longer in operation but that was previously located in the facilities of the establishment visited, had not been delisted.

The NFSA had not considered the possibility to grant conditional approval in all relevant cases. The mission team noted that establishments had been fully approved despite having incomplete HACCP plans (e.g. not including all the relevant activities as minced meat and meat products); establishments have also been approved with water not tested for chemical parameters.

The mission team observed that one establishment visited had been approved by the NFSA as a slaughterhouse for farmed game, however, the same establishment was not approved as a game handling establishment but as a game control posts. The slaughterhouse (including the chiller) had a small dimension. A cutting plant was annexed to the slaughterhouse without any physical separation between the two establishments (a door was open between the two facilities). The cutting plant was not approved but registered according to national legislation. Carcasses were sometimes hung in the cutting plant for maturation for at least 12 hours before being placed in the chiller. Some shortcomings concerning the general hygiene requirements was noted by the mission team in the cutting plant (walls not in sound conditions, worn out table, disinfectants and cleaning agents stored in the area where food is handled) and several equipments used for meat preparations. Most of these shortcomings had been addressed by the NFSA in an inspection report and corrective actions had been required³.

In one district visited, the NFSA had withdrawn the approval of an establishment approved for meat products after microbiological results not in conformity with the requirements and a negative evaluation of the hygienic conditions at the establishments.

³ See Annex 4 for comments from the NFSA.

Conclusion:

The publicly available list of approved establishments was not up to date as required by Article 31(1)(b) and (2)(f) of Regulation (EC) No 882/2004. The NFSA granted full approval to establishments not complying with all the relevant requirements of food law contrary to Article 31(2)(c) of the Regulation. However, in one case seen, the approval was withdrawn by the NFSA due to non-compliances identified, in line with Article 31(2)(e) of the same Regulation.

5.4.2 Food business operators' obligations and official controls.

5.4.2.1 General hygiene requirements

Legal requirements

Article 4(2) of Regulation (EC) No 852/2004 establishes that food business operators 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, siting and size of food premises.

Article 4 of Regulation (EC) No 854/2004 specifies that the competent authority shall carry out official controls in respect of products of animal origin to verify food business operators' compliance with these requirements.

Findings

Establishments were found to be mainly compliant with the general hygiene requirements. In some establishments the deficiencies related to structure and maintenance noted had already been identified by the NFSA and action by the food business operators had been requested. However, the following deficiencies, some of them not previously noted by the NFSA, were identified by the mission team during the visits:

- Layout and size of food premises that could not exclude cross contamination;
- pest control not always effectively considered;
- condensation in some chillers allowing possible contamination of carcasses;
- cleaning agents and disinfectant stored in areas where food was handled;
- equipment with which food came into contact was not effectively cleaned;
- wrapping and packaging material stored in a manner that exposed them to a risk of contamination.

Conclusion

A certain amount of deficiencies were noted in relation to the general hygiene requirements of Annex II to Regulation (EC) 852/2004. The competent authority carrying out official controls in respect of products of animal origin according to Article 4 of Regulation (EC) No 854/2004 had not always identified the non-compliance with these requirements.

5.4.2.2 Specific requirements

Legal requirements

Article 3 of Regulation (EC) No 853/2004 sets out that food business operators shall comply with the specific requirements of Annexes II and III to that Regulation.

Article 4(3) of Regulation (EC) No 852/2004 states that food business operators shall adopt specific hygiene measures regarding *inter alia* microbiological criteria for foodstuffs, sampling and analyses. Details on microbiological criteria for foodstuffs are set out in Regulation (EC) No 2073/2005.

Article 4 of Regulation (EC) No 854/2004 specifies that the competent authorities shall carry out official controls in respect of products of animal origin to verify food business operators' compliance with these requirements.

Findings

The establishments visited were found to be generally compliant with the specific hygiene requirements and relevant microbiological parameters had been tested although not always included in the HACCP plan (see chapter 5.4.2.3). Some deficiencies were noted by the mission team in individual establishments, in particular the following:

- Carcasses hung in chiller were in contact with crates and with the walls;
- a "CCP" carcass was stored together with and in contact with other carcasses in a cutting plant visited. A "CCP" carcass would be labelled such by the slaughterhouse due to e.g. imperfect evisceration or faecal contamination that would be removed by trimming. Such carcasses should, according to procedures in the cutting plant, be stored and handled separately and used only in the preparation of products reporting the instruction "to be cooked before consumption" for the final consumer.

In one establishment, not visited by the mission team but checked for the documentation available at district level, it was possible to verify that relevant microbiological parameters were tested for meat products and, when found not in conformity with the requirements, the NFSA had withdrawn the approval for these specific products.

Conclusion

Certain deficiencies were noted regarding the specific hygiene requirements as set out in Annex II and III to Regulations (EC) 853/2004. Foodstuffs were analysed for relevant microbiological parameters and food business operators' compliance with the microbiological criteria was controlled by the NFSA in line with Article 4 of Regulation (EC) No 854/2004.

5.4.2.3 HACCP-based systems

Legal requirements

According to Article 5 of Regulation (EC) No 852/2004 the food business operators shall put in place, implement and maintain a permanent procedure or procedures based on the HACCP principles. The specific requirements for HACCP-based procedures in slaughterhouses are specified in Section II of Annex II to Regulation (EC) No 853/2004.

Official controls within the scope of Regulation (EC) No 854/2004 shall include audits of HACCP-based procedures (Article 4(5)).

Council Directive 98/83/EC lays down the requirements for the quality of water intended for human consumption. In particular, Article 7 provides that Member States shall take all measures necessary to ensure that regular monitoring of the quality of the water intended for human consumption is carried out in order to check that the water available to consumers meets the requirements of this Directive and in particular the parametric values set in accordance with Article 5.

Findings

Several inconsistencies were observed by the mission team in relation to the implementation of HACCP plans in the establishments visited. The following was noted:

- No information concerning the procedure for the preparation and labelling of products “to be cooked before consumption” by the final consumer was included in the HACCP plan;
- hazards, their sampling and critical limits were in one case not identified in the HACCP plan; however laboratory results were available on-the-spot and were checked by the mission team confirming that the food business operator was testing the relevant parameters in conformity with the legislative requirements⁴;
- in another establishment a basic HACCP plan was available. However, the food business operator was unable to explain the hazard analyses carried out. Before the final meeting the mission team was informed by the NFSA that corrective actions was being followed up in the establishment;
- a vacuum steam utensil used to clean carcasses for fur was not effectively cleaned and disinfected after being used for contaminated carcasses allowing risk of further contamination; this key step in the processing chain was not described in the HACCP plan;
- temperature requirements to sterilize knives not included in the HACCP plan of two slaughterhouses;
- in two of the approved establishments visited by the mission team water used was from own sources and had never been tested for chemical parameters.

The inconsistencies identified by the mission team and related to the HACCP plans had not always been addressed by the NFSA in their reports.

The mission team visited a private laboratory analysing own-check samples received from food business operators. The laboratory was accredited for the parameters relevant to the scope of the mission and carried out regular ring test with mainly satisfactory results. The result of the last ring test for *E. Coli*, January 2011, results available in March 2011 was inadequate for *E. Coli*. Corrective actions were implemented in April 2011. The mission team identified some shortcomings concerning traceability of samples non related to the scope of the mission.

Conclusion

HACCP based systems were available in the establishments visited by the mission team, however, these were not always completely in line with the requirements laid down in Article 5 of Regulation (EC) No 852/2004 and Section II of Annex II to Regulation (EC) No 853/2004. The competent authorities had not always verified food business operators' compliance with the requirements of the above mentioned Regulations concerning HACCP-based procedures as laid down in Article 4(5) of Regulation (EC) No 854/2004. Inconsistencies in the implementation of the requirements listed in Articles 5 and 7 of Directive 98/83/EC were observed by the mission team in two establishment visited.

5.4.2.4 Identification marking, labelling and traceability

Legal requirements

Provisions for the identification marking of products of animal origin are laid down in Article 5 and Section I of Annex II to Regulation (EC) No 853/2004.

⁴ See Annex 4 for comments from the NFSA.

According to Article 18 of Regulation (EC) No 178/2002 the food business operators 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 verification of compliance with traceability requirements takes place in all approved establishments.

Findings

The following shortcomings were observed by the mission team during the visits to different establishments:

- Several uncovered products not identifiable in one establishment; unidentifiable packed products in the freezer of another establishment⁵;
- products of animal origin from an approved establishment were placed on the market with a square, not the assigned oval, identification mark printed on the labelling. The NFSA had not addressed this during official controls;
- no identification mark was printed on the labelling in one establishment. The food business operator stated that the approval number would be used as lot-number on the labels, however, it could not be clarified to the mission team how this ensured the traceability of the products⁶;
- ear tag number of farmed deer or the name of the hunter was used as lot number for products originating from farmed game (deer) and wild game respectively. For both cases the mission team noted several packed products without the relevant lot numbers. Before the final meeting the mission team was informed by the NFSA that corrective actions by the food business operator would be followed up by the district office.

Conclusion

In general the mission team found identification marking and labelling consistently placed on the commodities inspected in line with requirements, however, unidentifiable products (not labelled) or labelled with information not in line with Article 5 and Section I of Annex II to Regulation (EC) No 853/2004 were observed. Traceability systems and procedures were not always in place to identify from whom certain products have been supplied, as required by Article 18 of Regulation (EC) No 178/2002. Furthermore, the insufficient/incorrect labelling had not always been addressed by the NFSA in line with Article 4(6) of Regulation (EC) No 854/2004.

5.5 Official inspection tasks in establishments for verification of the food business operators' compliance

5.5.1 Food chain information – farmed game

Legal requirements

According to Article 5(1) of Regulation (EC) No 854/2004 the official veterinarian shall carry out inspection tasks in slaughterhouses, also as regards food chain information.

Findings

According to the information received from the NFSA head office at the initial meeting there is, in addition to the health certificates, a food chain information system in place for farmed game. The system is paper-based and the NFSA head office explained that in the

⁵ See Annex 4 for comments from the NFSA.

⁶ See Annex 4 for comments from the NFSA.

near future an electronic system will be set up for all slaughter animals (pigs, cattle, farmed game, etc). In case the animals are slaughtered at the holding (i.e. stunning, bleeding and possibly evisceration), the slaughtered animal has to be accompanied by a prescribed certificate for farmed game slaughtered at the holding. These certificates are to be checked by the official veterinarian at the slaughterhouse. A designated oval health mark for approved carcasses is in use.

In an establishment visited, the food chain information for farmed live reindeer available included information on veterinary medicine used, animal welfare issues, place of origin, time of loading, etc.

One game handling establishment visited, also approved as slaughterhouse, received farmed game carcasses. The mission team checked some documents accompanying carcasses reporting that the official veterinarian was present at killing time and that health status and medical records had been checked prior to shooting the farmed game. However, no health certificates accompanied farmed deer to this establishment⁷.

Conclusion

The system for food chain information included farmed game. Food chain information was checked by the official veterinarian as required by Article 5(1) of Regulation (EC) No 854/2004. However, the health certificate provided for in Chapter X.B of Annex I to Regulation (EC) No 854/2004 was not used in one establishment visited by the mission team.

5.5.2 *Ante-mortem inspection – farmed game*

Legal requirements

Article 5(1) of Regulation (EC) No 854/2004 requires that the official veterinarian 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, and with the specific requirements of Section IV, Chapter VII.A of Annex I to the same regulation.

According to Section III of Annex III to Regulation (EC) No 853/2004 food business operators may slaughter farmed raptines and farmed ungulates (*Cervidae* and *Suidae*) at the place of origin with the authorization of the competent authority if: (h) evisceration takes place on-the-spot under the supervision of the veterinarian and (j) an approved veterinarian issued and signed a certificate accompanying the slaughtered animals attesting to a favourable result of the ante-mortem inspection, correct slaughter and bleeding and the date and time of slaughter.

Findings

The mission team visited a farmed game slaughterhouse which slaughtered reindeer. The mission team noted that the ante-mortem inspection, including checks on records and documentation, was carried out and documented by the official veterinarians. A comprehensive ante-mortem register was in place. In addition, an internal instruction on how to perform ante-mortem controls had been issued by the local district office.

The mission team also visited a farmed game handling establishment which processed carcasses of farmed game slaughtered on the holding of provenance where ante-mortem inspection had been performed by an official veterinarian and registered. According to the information received from the responsible district office the official veterinarian would be present during killing of the animals (See 5.5.1).

⁷ See Annex 4 for comments from the NFSA.

A farm with farmed deer was also visited where it was confirmed, by available ante-mortem registers, that all animals had undergone inspection by an official veterinarian before slaughtering.

Conclusion

Ante-mortem inspection at the holding of provenance and in slaughterhouses were generally in line with Article 5(1) of Regulation (EC) No 854/2004.

5.5.3 Post-mortem inspection – farmed game

Legal requirements

Article 5(1) of Regulation (EC) No 854/2004 requires that the official veterinarian carries out inspection tasks, including post-mortem inspection in accordance with the general requirements of Section I, Chapter II of Annex I to Regulation (EC) No 854/2004 and with the specific requirements of Section IV, Chapter VII.B of Annex I to the same Regulation.

Findings

According to information received from the NFSA head office the instruction on meat control (*Kjøttkontrollinstruksen*) was repealed by the implementation of the Food Hygiene Package in Norway from 1 May 2010. However, no new instructions have been issued by the NFSA head office regarding different meat control procedures, e.g. for different species of farmed game (see also chapter 5.2.2).

In one slaughterhouse visited post-mortem controls were carried out on farmed reindeer and registers for performed post-mortem controls were available. However, the following parts of the animals were not included in the post mortem examination: heads, tongues and intestines including spleen. Furthermore, the oval health mark was stamped on the carcasses before trimming and cleaning of hair/contamination, i.e. contaminated carcasses were being approved for human consumption.

In a small slaughterhouse visited, handling farmed and wild game deer, registers were in place for post-mortem inspection of all carcasses and offal.

Conclusion

Post-mortem controls were carried out on farmed game and registers for performed controls were available in the slaughterhouses visited. However, deficiencies were noted in one slaughterhouse where the post-mortem inspection procedures were not in line with the specific requirements of Section IV, Chapter VII.B of Annex I to Regulation (EC) No 854/2004.

5.5.4 Post-mortem inspection – wild game

Legal requirements

Article 5(1) of Regulation (EC) No 854/2004 requires that the official veterinarian carries out inspection tasks, including post-mortem inspection in accordance with the general requirements of Section I, Chapter II of Annex I to Regulation (EC) No 854/2004 and with the specific requirements of Section IV, Chapter VIII.A of Annex I to the same Regulation.

Section IV, Chapter II of Annex III to Regulation (EC) No 853/2004 lays down requirements for the handling of large wild game, including requirements related to the

trained person's examination and declaration indicating the date, time and place of killing and any abnormal findings during the initial examination of the game.

Findings

At the two game handling establishments visited by the mission team, carcasses were accompanied by a trained hunter's declaration and submitted to post-mortem control by the NFSA official veterinarian. If no trained person had performed the examination of the viscera, the viscera was also examined by the official veterinarian at establishment level.

The hunters declaration observed during the mission were in some cases the model designed by the Norwegian Forestry Extension Institute (see chapter 5.3) including the identification number of the trained hunter. In one game handling establishment visited, the food business operator had designed his own hunter's declaration to be filled in by hunters.

Until a sufficient number of hunters in Norway have been trained to carry out the initial examination of wild game on-the-spot, the NFSA informed the mission team that hunters could bring wild game to an approved game control posts for the initial examination to be carried out by an official veterinary/auxiliary. Carcasses will be stamped with a square health mark (see also Chapter 5.5.2) and can be placed on the domestic market under the same conditions as if the initial examination is carried out by a trained hunter.

It was confirmed at the visits to two game handling establishments that all carcasses of wild game arrived with the red offal, including carcasses accompanied by a declaration from a trained hunter. An official veterinarian carried out post-mortem examination in the game handling establishments. In both cases registers for the performed post-mortem examinations by the official veterinarian at the establishments were available.

Conclusion

The initial examination of wild game on-the-spot, carried out by trained hunters or, alternatively, by officials in an approved game control post met the requirements of Section IV Chapter II(2) of Annex III to Regulation (EC) No 853/2004. Post mortem examination of wild game was carried out by official veterinarians in game handling establishments in line with the general requirements of Section I, Chapter II of Annex I to Regulation (EC) No 854/2004 and specific requirements of Section IV, Chapter VIII.A of Annex I to the same Regulation.

5.5.5 *Trichinella*:

Legal requirements

Article 33 of Regulation (EC) No 882/2004 sets out a number of duties to be assumed by a National Reference Laboratory, *inter alia* in relation to *Trichinella*.

Section IV, Chapter IX.C of Annex I to Regulation (EC) No 854/2004 requires that carcasses of swine (domestic, farmed game and wild game), solipeds and other species susceptible to trichinosis are to be examined for trichinosis in accordance with Community legislation, unless that legislation provides otherwise.

Regulation (EC) No 2075/2005 lays down specific rules on official controls for *Trichinella* in meat. Chapter II of the Regulation states the obligations of competent authorities and of food business operators. Annex III to the Regulation sets out requirements relating to the examination of animals other than swine. Finally, Article 7 of

the Regulation requires competent authorities to have contingency plans in place outlining all action to be taken where samples test positive to *Trichinella*.

Findings

According to the information received from the NFSA head office, the Veterinary Institute (*Veterinærinstituttet*) in Oslo has been appointed as National Reference Laboratory (NRL) for *Trichinella* testing in Norway. The *Trichinella* testing is performed at local laboratories either on-the-spot laboratories in slaughterhouses, at some district offices of the NFSA with laboratory facilities, or in private laboratories.

According to the information received from the NFSA head office, the relevant laboratories have not yet been accredited for *Trichinella* testing. The transitional period for accreditation expires on 1 January 2014.

In order to take part in a ring test organised by the NRL, in cooperation with the Swedish Veterinary Institute (*Statens veterinärmedicinska anstalt*) in 2011, laboratories were required to have participated in a basic training course for *Trichinella* testing that was organised by the Swedish Veterinary Institute in 2011. Since not all participated in this course, all relevant laboratories did not participate in the ring test. The NRL plans to organise a basic training course in Norway spring/summer 2012.

According to the NFSA head office the susceptible species in Norway are wild boar and brown bear.

The samples for *Trichinella* testing are taken by official veterinarians in connection with post-mortem examination for all species. The samples are examined in official or private laboratories depending on the organisation of the district. The testing method is the magnetic stirrer method.

One district office of the NFSA visited performed *Trichinella* testing of pigs and one bear (in 2010). The laboratory had positive and negative control samples from the NRL available to test the efficiency of the tests carried out. The officials stated that the performance of tests was good, however, there was no documentation available to confirm this. This laboratory had not participated in the ring test organised by the NRL. The facilities and equipment for the magnetic stirrer method were appropriate. However, the mission team noted that pepsin was kept at ambient temperature in a locked safe and not under controlled temperature.

In another district, the mission team was informed that farmed wild boar could be slaughtered in the same day as domestic pigs in the same slaughterhouse. There were no written procedure in place to sample the two categories of animals separately.

In another laboratory visited the magnifying power of the microscope used was only 45X (and not between 60-100X). Results of a ring test carried out by the Swedish Veterinary Laboratory were available but only 71% of the positive samples received were detected as positive.

Finally the mission team was informed by representatives of the NFSA head office that a contingency plan concerning *Trichinella* had not been prepared.

Conclusions:

Full compliance with Article 33(c) of Regulation (EC) No 882/2004 could not be ensured since an official laboratory visited had not taken part in the ring test for *Trichinella* organised by the NRL.

Relevant species were sampled and tested for *Trichinella* as laid down in Section IV, Chapter IX.C of Annex I to Regulation (EC) No 854/2004. However, it could not be ensured that *Trichinella* sampling and analyses were in line with the requirements laid down in Annex III of Regulation (EC) No 2075/2005. A contingency plan as required by Article 7 of Regulation (EC) No 2075/2005 outlining all actions to be taken where samples test positive to *Trichinella* was not available.

5.5.6 Health marking

Legal requirements

Article 5(2) of Regulation (EC) No 854/2004 requires that health marking shall be carried out in slaughterhouses and game handling establishments by, or under the responsibility of, the official veterinarian when official controls have not identified any deficiencies that would make the meat unfit for human consumption.

Findings

In the establishments visited, oval health marks were applied to carcasses of farmed and wild game following post-mortem examination. The health marks were kept under lock by the responsible official veterinarians in the establishments.

In one of the establishments, the health mark was applied to contaminated carcasses (see chapter 5.5.3). The official veterinarian explained that the establishment had a procedure in place for removing the contamination at a later stage, before cutting the meat.

Due to the system in place where square stamps are applied to carcasses in wild game control posts (see also chapter 5.2.2), carcasses with a square stamp could arrive to a game handling establishment and be stamped with an oval health mark later on. The district officers met during the mission agreed that this was confusing.

In one small establishment visited, approved as a slaughterhouse and a wild game control post, farmed and wild game underwent the same official controls by an official veterinarian. An oval health mark was applied to carcasses of farmed game and a square stamp to carcasses of wild game. The representative of the district office of the NFSA did not have a clear explanation for this difference in the health mark stamping.

Conclusion

Health marking was not always in line with the requirements laid down in Article 5(2) of Regulation (EC) No 854/2004, in particular since contaminated carcasses were health marked and declared fit for human consumption.

6 Final meeting

The final meeting was held with representatives of the NFSA and the Ministry of Health and Care Services in Oslo on Wednesday 23 November 2011. At this meeting, the mission team presented its main findings and some preliminary conclusions of the mission. At the meeting the mission team also explained that, based on a more detailed assessment of the information received during the mission, additional conclusions and recommendations could be included in the report.

The NFSA did not have any objections to the observations made and the preliminary conclusions presented.

7 Recommendations

Norway should notify the Authority, within two months of receiving the final report, by way of written evidence, of the corrective actions taken and a plan for corrective measures and actions, including a timetable for completion of measures still outstanding, relevant to all the recommendations hereunder. The Authority should also be kept informed of the completion of the measures included in the timetable.

No	Recommendation
1	Norway should notify the Authority of all national measures and derogations in place concerning farmed and wild game meat as required by Article 10(5) of Regulation (EC) No 853/2004.
2	Norway should ensure that the staff carrying out official controls are free from conflicts of interest as required by Article 4(2)(b) of Regulation (EC) No 882/2004. The NFSA staff should receive relevant training and being kept up-to-date in their competencies in particular regarding assessment of HACCP plans in line with the requirements laid down in Article 6 of Regulation (EC) No 882/2004.
3	Norway should ensure that official controls are carried out regularly, on a risk basis and with appropriate frequency in accordance with Article 3 of Regulation (EC) No 882/2004. Efficient and effective coordination should be ensured between different units of the competent authority as required by with Article 4(5) of Regulation (EC) No 882/2004.
4	Norway should keep up-to-date the publicly available list of approved establishments as required by Article 31(1)(b) and (2)(f) of Regulation (EC) No 882/2004. The competent authority should grant full approval only to establishments complying with all the relevant requirements as required by Article 31(2)(c).
5	Norway should ensure that establishments fulfil general hygiene requirements of Annex II of Regulation (EC) No 852/2004. The competent authority should also ensure that all shortcomings in establishments are noted and reported in accordance with Article 4 of Regulation (EC) No 854/2004
6	Norway should ensure that specific hygiene requirements are fulfilled by the establishments according to Annexes II and III to Regulation (EC) No 853/2004.
7	Norway should ensure that HACCP based systems are in line with the requirements laid down in Article 5 of Regulation (EC) No 852/2004 and Section II of Annex II to Regulation (EC) No 853/2004. The competent authorities should always verify food business operators' compliance with the requirements of the above mentioned Regulations concerning HACCP-based procedures as laid down in Article 4(5) of Regulation (EC) No 854/2004.
8	Norway should ensure that the requirements listed in Articles 5 and 7 of Directive 98/83/EC are fulfilled.
9	Norway should ensure that game products are labelled with information in line with Article 5 and Section I of Annex II to Regulation (EC) No 853/2004. Norway also should ensure that traceability systems and procedures are always in place to identify from whom certain products have been supplied, as required by Article 18 of Regulation (EC) No 178/2002.
10	Norway should ensure that relevant health certificates and in particular Specimen

	B in Chapter X Annex I to Regulation (EC) No 854/2004 accompany farmed animals slaughtered at the holding, as required by Chapter VII, Section IV of Annex I to Regulation (EC) No 854/2004.
11	Norway should ensure that post-mortem inspection procedures are in line with the the specific requirements laid down in Chapter VII(B), Section IV of Annex I to Regulation (EC) No 854/2004.
12	Norway should ensure full compliance with the requirements laid down in Article 33(c) of Regulation (EC) No 882/2004 concerning participation of official laboratories in ring test for <i>Trichinella</i> organised by the NRL. Furthermore, Norway should ensure full compliance with the requirements of Regulation (EC) No 2075/2005 concerning the examination of animals other than swine and a contingency plan outlining all action to be taken where samples test positive to <i>Trichinella</i> .
13	Norway should ensure that health marking is in line with the requirements laid down in Article 5(2) of Regulation (EC) No 854/2004.

Annex 1 - List of abbreviations and terms used in the report

The Authority	EFTA Surveillance Authority
EEA	European Economic Area
EEA Agreement	Agreement on the European Economic Area
Food Hygiene Package	<p>A term that refers to a group of European Regulations that represent a significant reorganisation of the regulatory framework for food and feed hygiene and safety. The package builds on general food law basis established by <i>Regulation (EC) No 178/2002 of the European Parliament and the Council laying down the general principles and the requirements of food law, establishing the European Food Safety Authority and laying down procedures for matters of food safety.</i></p> <p>The Food Hygiene Package includes several Regulations, <i>inter alia</i>, Regulations (EC) No 852/2004, 853/2004 854/2004.</p>
HACCP	Hazard Analysis and Critical Control Point
MATS	NFSA's quality control system
NFSA	Norwegian Food Safety Authority
NRL	National Reference Laboratory

Annex 2 - Relevant legislation

The main EEA Acts regarding game meat and referred to in this report:

- a) The Act referred to at Point 1.1.11 of Chapter I of Annex I to the EEA Agreement, *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*, as amended.
- b) The Act referred to at Point 1.1.12 of Chapter I of Annex I to the EEA Agreement, *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*, as amended and as adapted to the EEA Agreement by the sectoral adaptations referred to in Annex I to that Agreement.
- c) The Act referred to at Point 1.2.74 of Chapter I of Annex I to the EEA Agreement, *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*;
- d) The Act referred to at Point 6.1.16 of Chapter I of Annex I to the EEA Agreement, *Regulation (EC) No 852/2004 of the European Parliament and of the Council of 29 April 2004 on the hygiene of foodstuffs*, as amended.
- e) The Act referred to at Point 6.1.17 of Chapter I of Annex I to the EEA Agreement, *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*, as amended and as adapted to the EEA Agreement by the sectoral adaptations referred to in Annex I to that Agreement.
- f) The Act referred to at Point 6.2.52 of Chapter I of Annex I to the EEA Agreement, *Commission Regulation (EC) No 2073/2005 of 5 December 2005 on microbiological criteria for foodstuffs*, as amended.
- g) The Act referred to at Point 6.2.54 of Chapter I of Annex I to the EEA Agreement, *Commission Regulation (EC) No 2075/2005 of 5 December 2005 laying down specific rules on official controls for Trichinella in meat*, as amended.
- h) The Act referred to at Point 7.1.13 of Chapter I of Annex I to the EEA Agreement, *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*, as amended and as adapted to the EEA Agreement by the sectoral adaptations referred to in Annex I to that Agreement.
- i) The Act referred to at Point 7a of Chapter II of Annex XX to the EEA Agreement, *Council Directive 98/83/EC of 3 November 1998 on the quality of water intended for human consumption*.

Annex 3 - Figures on production and trade of game meat

(source: the Norwegian Food Safety Authority⁸)

1. Production from farms rearing game in Norway;

Species	No. of farms	Average no. of animals per farm or estimation of the national stock	Main productive region
Reindeer	542 <i>siidaparts</i> in 2010 (see below) ⁹	An estimation of the national stock is about 240 000 to 250 000.	Finnmark is the main area for tame reindeer in Norway. Finnmark has 70 % of the total population of reindeer.
Deer	70 ¹⁰	100	Hedmark/Oppland, Buskerud/Vestfold/Telemark, Hordaland/Sogn og Fjordane, Trøndelag/Møre og Romsdal, Nordland
Fallow deer	1	155	Sunnfjord
Llama	48	10	Hedmark/Oppland, Buskerud/Vestfold/Telemark, Rogaland, Nordland
Alpaca	6	20	Hedmark og Oppland, Oslo, Buskerud, Oslo og Østfold
Camel & donkey	1	11	Oslo
Ostrich	3	few animals (<10?)	Romerike, Hedmark/Oppland
Wild boar	14	10-20	Hedmark/Oppland, Trøndelag/Møre og Romsdal, Nordland

2. The amount of the wild game meat production;

	2009 (Numbers are approximately)	2010 (Numbers are approximately)
Wild reindeer	5098 individuals	5457 individuals (1 800 tons meat)
Moose	35 971 individuals	36 409 individuals
Deer	37 695 individuals	39 070 individuals
Low land grouse	110 200 individuals	127 850 individuals
Mountain grouse	54 050 individuals	66 800 individuals

⁸ The information in the tables is mainly drawn from Statistics Norway (*Statistisk Sentralbyrå*). The statistics do not distinguish between farmed game and wild game. As a thumb rule the NFSA has therefore regarded the numbers for reindeer as farmed game (as this is the predominant farmed species) and the numbers for other game as wild game.

⁹ In Norway the reindeer are not kept in farms but in areas where they roam almost freely. There are 7 reindeer areas (*reindriftsområder*). Each area is divided in smaller areas (*soner*) that are divided into districts. Districts are divided into *siidar* that are divided into *siidaparts*. The *siidaparts* are the holdings and there are 542 *siidaparts* in Norway.

¹⁰ Number of farms according to feedback from regional and district offices of the NFSA. According to the Norwegian Agricultural Authority (*Statens Landbruksforvaltning*) 75 deer farms, with a total number of 5308 animals, had applied for production aid at 1 January 2011.

3. The amount of the wild game meat production for other EEA states;

2009/2010

Game	Year	Type of meat	Amount	Destination
Deer	2009	deboned, fresh meat, chilled or frozen	856 kg	Sweden
Deer	2009	“	1 031 kg	Germany
Deer	2009	“	11 kg	UK
Moose	2010	“	2 142 kg	Denmark
Moose	2010	“	177 kg	Germany
Deer	2010	“	4 745 kg	Denmark
Deer	2010	“	28 kg	UK

4. The total import of wild game meat from third countries (detail if in-skin import);

2009/2010

Game	Year	Type of meat	Amount	From
Deer	2009	deboned, fresh meat, chilled or frozen	6 272 kg	Australia
Deer	2009	“	66 494 kg	New Zealand
Deer	2010	“	83 159 kg	New Zealand

5. The amount of the farmed game meat production;

Tame reindeer	2008/2009	2010
domestic market (included meat for private use)	1838 tons	2055 tons
export	-	9.2 tons

6. The amount of the farmed game meat production for other EEA states;

2009/2010

Game	Year	Type of meat	Amount	Destination
Reindeer	2009	deboned, fresh meat, chilled or frozen	99 kg	Germany
Reindeer	2009	“	11 kg	UK
Reindeer	2010	“	169 kg	Denmark
Reindeer	2010	“	610 kg	Iceland
Reindeer	2010	“	24 kg	Netherlands
Reindeer	2010	“	2200 kg	Romania
Reindeer	2010	“	28 kg	UK
Reindeer	2010	“	3000 kg	Sweden

Annex 4 – Reply from the NFSA to the draft report



**ROYAL NORWEGIAN
MINISTRY OF AGRICULTURE AND FOOD**

EFTA Surveillance Authority
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Belgium

Your ref
CNo 69931 ENo 618552

Our ref
201001542/ADO

Date
27.01.2012

**Subject: EFTA Surveillance Authority mission to Norway from 14 to 23
November 2011 concerning application of EEA legislation related to the safety
of food of animal origin, in particular farmed and wild game meat - draft report**

Please find the Norwegian Food Safety Authority's response to the draft report from the mission concerning the safety of food of animal origin, in particular farmed and wild game meat.

Yours sincerely,



Bente Odlo
Deputy Director General



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Our ref: 2011/224853
Date: 23.01.2012
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Norwegian Food Safety Authority



COMMENTS ON THE EFTA SURVEILLANCE AUTHORITY MISSION DRAFT REPORT ON FARMED AND WILD GAME MEAT IN 2012

The Norwegian Food Safety Authority has found no fault in the factual contents in the draft report. The District offices have taken several actions in response to your findings locally after your mission. We have listed the relevant findings with actions, please look to the annex. We have not listed actions that we informed you of during your mission.

The head office of the Norwegian Food Safety Authority has started working on your recommendations. Some of the recommendations will require careful consideration and planning to give the best result. We hope that you will allow us time to reply to your recommendations in a satisfactory way.

Yours Sincerely

Randi Edvardsen
Head of Section

Annex

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Annex

Norwegian Food Safety Authority



COMMENTS ON THE EFTA SURVEILLANCE AUTHORITY MISSION DRAFT REPORT ON FARMED AND WILD GAME MEAT IN 2012

Finding: 5. 2. 1: In one slaughterhouse visited, approved for farmed game, the NFSA officials explained to the mission team that a private veterinarian was hired part-time by the NFSA to carry out official controls if no official veterinarian was available. The same veterinarian was also working as private practitioner, prescribing drugs and treatment, for the farm keeping animals slaughtered in the same slaughterhouse. The mission team noted that the register for ante mortem and post mortem control carried out in the slaughterhouse was signed by the official veterinarian.

The District office ceased this practice at once as a direct consequence of the EFTA Surveillance Authority mission.

Finding: 5. 4. 1: The mission team observed that one establishment visited had been approved by the NFSA as a slaughterhouse for farmed game, however, the same establishment was not approved as a game handling establishment but as a game control posts. The slaughterhouse (including the chiller) had a small dimension. A cutting plant was annexed to the slaughterhouse without any physical separation between the two establishments (a door was open between the two facilities). The cutting plant was not approved but registered according to national legislation. Carcasses were sometimes hung in the cutting plant for maturation for at least 12 hours before being placed in the chiller. Some shortcomings concerning the general hygiene requirements was noted by the mission team in the cutting plant (walls not in sound conditions, worn out table, disinfectants and cleaning agents stored in the area where food is handled) and several equipments used for meat preparations. Most of these shortcomings had been addressed by the NFSA in an inspection report and corrective actions had been required

The District office had previously addressed these issues. The establishment is planning a reconstruction, improvement and enlargement of the premises so that also the cutting plant can be approved. The establishment is aiming at approval of the cutting plant before the beginning of this year's season in autumn and the District office will follow this up closely.

Finding: 5.4.2.3 Hazards, their sampling and critical limits were in one case not identified in the HACCP plan; however laboratory results were available on-the-spot and were checked by the

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mission team confirming that the food business operator was testing the relevant parameters in conformity with the legislative requirements.

The District office has taken action on this finding with a written individual decision. The establishment has replied that they now fulfill the requirements on identifying hazards with sampling plans and critical limits. The new written HACCP plan was found to comply with (EC) No 852/2005 and 853/2004 on the check up inspection. The practical use of the HACCP plan will also be inspected when the establishment starts producing again.

Finding: 5.4.2.4: - Several uncovered products not identifiable in one establishment; unidentifiable packed products in the freezer of another establishment. - no identification mark was printed on the labelling in one establishment. The food business operator stated that the approval number would be used as lot-number on the labels, however, it could not be clarified to the mission team how this ensured the traceability of the products.

The District office has made a individual decision in a written report, ordering the removal of unmarked products from the establishment. This was verified in an inspection the 17. November 2011. The Food business operator had destructed the unlabeled meat. The Food business operator has ordered a repair of the weight enabling correct informasjon printed on the labeling. The Food business operator has also provided a list of all animals slaughtered in his establishment with a date, type, weight and group of hunters. These findings are documented in a report dated 22. November 2011 after a check up inspection the same date.

Finding: 5.5.1: One game handling establishment visited, also approved as slaughterhouse, received farmed game carcasses. The mission team checked some documents accompanying carcasses reporting that the official veterinarian was present at killing time and that health status and medical records had been checked prior to shooting the farmed game. However, no health certificates accompanied farmed deer to this establishment.

The District office has made a written report with a decision that health certificates have to accompany farmed deer to the establishment.