Brussels, 2 February 2007

Case No: 60369
Event No: 408409

Final report

EFTA Surveillance Authority mission to

NORWAY

16 to 20 October 2006

concerning rabbit meat, farmed and wild game meat

Please note that comments from the Norway to factual errors have been included in *bold, italic print* in the body of the report.

Comments providing additional information or expressing the Norwegian view on particular issues are referred to in footnotes and included in Annex 2 of the report.
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1 Introduction

The mission took place in Norway from 16 to 20 October 2006. The mission team comprised two inspectors from the EFTA Surveillance Authority (the Authority) and one observer from the European Commission's Food and Veterinary Office.

The opening meeting was held on Monday 16 October 2006 at the Norwegian Food Safety Authority's (NFSA) head office in Oslo with representatives of the head office, the National Centre of Animals and Food, the Ministry of Agriculture and Food, and the Ministry of Health and Care Services. At the meeting the objectives and itinerary of the mission were confirmed by the mission team and the representatives of the NFSA provided additional information to that set out in the Norwegian reply to the Authority's pre-mission questionnaire.

Throughout the mission a representative of the National Centre of Animals and Food or from the head office accompanied the mission team. In addition, representatives of the relevant regional offices and the district offices participated in meetings at the district offices and during visits to the different establishments.

In each establishment visited, a short summary of the main observations made by the mission team during the visit was presented, on which the representatives of the NFSA and the establishment had an opportunity to comment on.

A final meeting was held at the head office of the NFSA in Oslo on 20 October 2006, at which the mission team presented the main findings and some preliminary conclusions from the mission.

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

2 Objectives of the mission

The main objective of the mission was to evaluate application of the Acts referred to in Chapter 3 related to rabbit meat, farmed and wild game meat laid down in the Agreement on the European Economic Area (the EEA Agreement). The mission team evaluated the veterinary supervision performed by the Norwegian competent authority. In order to fulfil the aim of the mission the mission team visited establishments considered representative for the production of farmed and wild game meat in Norway and covered a representative part of the country. In line with the farm-to-fork approach, certain aspects of traceability were also subject to inspection. Finally, the mission included also a follow-up of corrective actions taken in response to the mission carried out by the Authority in 2001, which was the Authority's first mission to Norway related to the rabbit meat, farmed and wild game meat.

The animal control sites and food processing establishments visited during the mission are listed in Table 1.
Table 1: Live animal control sites and food processing establishments visited during the mission

<table>
<thead>
<tr>
<th>Live animal control sites</th>
<th>Number</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Deer farm</td>
<td>1</td>
<td>Belonging to the slaughterhouse visited</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Food processing establishments</th>
<th>Number</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Slaughterhouse for farmed game meat (reindeer)</td>
<td>1</td>
<td>EEA approved</td>
</tr>
<tr>
<td>Slaughterhouse for farmed game meat (deer)</td>
<td>1</td>
<td>Approved for marketing on the national territory</td>
</tr>
<tr>
<td>Game meat processing house</td>
<td>2</td>
<td>Production for marketing on the national territory</td>
</tr>
<tr>
<td>Collection centre</td>
<td>1</td>
<td></td>
</tr>
<tr>
<td>Temperature controlled stores</td>
<td>4</td>
<td>Integrated in the above-mentioned establishments</td>
</tr>
</tbody>
</table>

The activities are listed according to the observation made on-the-spot.

3 Legal basis for the mission

The legal basis for the mission was:

a) 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).

b) Point 4 of the Introductory Part of Chapter I of Annex I to the EEA 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.


4 National legislation

In the answer to the pre-mission questionnaire Norway informed the Authority that the relevant Acts incorporated into the EEA Agreement related to rabbit meat, farmed and wild game meat have been transposed into Norwegian law as follows (quotation from the submitted document):
a) Main acts related rabbit meat, farmed and wild game meat:
   - Food Act (Lov om matproduksjon og mattrygghet mv (matloven)), LOV 2003-12-19 124.

b) General regulations and instructions made under the Food Act:
   - Regulation on official meat control (Forskrift om offentlig kjøttkontroll og frambud mv av ferskt kjøtt), FOR 1978-07-14 9629, as amended.
   - Regulation on the hygiene in abattoirs, cutting plants, cold stores and freezer stores for fresh meat (Forskrift om hygiene mv i slakterier, nedskæringsvirksomheter og kjøle- og fryselager for ferskt kjøtt), FOR 1994-02-18 137, as amended.
   - Regulation on the hygiene and control etc. relating to the production and placing on the market of fresh poultry meat (Forskrift om hygiene og kontroll mv ved produksjon og omsetning av ferskt fjørfekjøtt), FOR 1995-03-21 265, as amended.
   - Instruction on the meat control (Instruks for kjøttcontrol) no. 369 adopted 25.05.1994, as amended.

c) Instructions made under the Meat Production Act related to Trichinae control:
   - Instruction for Trichinae control (Instruks for trikinkontroll) no. 962 adopted 8.11.1995, as amended.

d) Regulations and instructions made under the Food Act related to farmed game meat and rabbit meat:
   - Regulation on the hygiene in abattoirs etc. for reindeer and farmed wild game meat (Forskrift om hygiene i slakterier mv for rein og oppdrettsvilt), FOR 1995-08-28 776, as amended.
   - Regulation on the hygiene and control etc. relating to the production and placing on the market etc. of rabbit and farmed game meat (Forskrift om hygiene og kontroll mv ved produksjon og omsetning mv av kaninkjøtt og kjøtt av oppdrettsvilt), FOR 1996-02-02 132, as amended.
   - Instruction on the control of rabbit meat (Instruks for kaninkjøttkontroll) no. 393 adopted 15.04.1996, as amended.

e) Regulations and instructions made under the Food Law related to wild game meat:
   - Regulation on the hygiene and control etc. relating to the production and placing on the market of wild game meat (Forskrift om hygiene og kontroll mv ved produksjon og omsetning av viltkjøtt), FOR 1996-02-02 133, as amended.
   - Instruction on the control of wild game meat (Instruks for viltkjøttkontroll) no. 394 adopted 15.04.01996, as amended.

5 Previous mission

In 2001, the Authority carried out its first mission related to rabbit meat, farmed and wild game meat in Norway. The final report from that mission is available on the Authority's homepage: http://www.eftasurv.int.

In the report from the 2001 mission the Authority concluded, inter alia, that there was no information received that the approval of reindeer slaughterhouses for national production only was based on the derogation provided for in Article 6(3) of Council Directive
91/495/EEC as amended. With regard to the list of establishments approved in accordance with Council Directive 91/495/EEC it was concluded that the list was not comprehensive and therefore not in compliance with Article 14 of that Directive. It was also concluded that a system for the placing on the market of wild game meat on the national market operated parallel with an incomplete system for the placing on the market within the EEA.

With regard to farmed game meat it was concluded that establishments were approved by the former competent authority to produce in the same facilities farmed game meat approved for the EEA and national market without ensuring adequate separation between these productions. Finally, it was concluded with regard to veterinary supervision of establishments that the health marking was not always in accordance with Council Directive 91/495/EEC and that the veterinary supervision of own-checks systems needed improvement.

Finally, it was concluded that it was not in accordance with Council Directive 91/495/EEC and Council Directive 92/45/EEC that Trichinae control was not foreseen.

6 Main findings

6.1 The Competent Authority

6.1.1 Structure and organisation

The Ministry of Agriculture and Food, the Ministry of Health and Care Services and the Ministry of Fisheries and Coastal Affairs are responsible for the food safety and quality legislation. The Ministry of Agriculture and Food is responsible for national legislation concerning rabbit meat, farmed and wild game meat.

Paragraph 23 of the Food Act of 19 December 2003 delegates the competence to administer national legislation regarding rabbit meat, farmed and wild game meat to the NFSA. Accordingly, the NFSA established on 1 January 2004 is the competent authority.

The NFSA is organised into three administrative levels, the central level with the head office, a regional level with eight regional offices, and a local level with 64 district offices. The head office, located in Oslo, is responsible for co-ordinating the organisation's activities including, inter alia, inspections, disease surveillance and eradication, and preparation of legislation. Out of a total of 1,300 employees in the NFSA, the head office has approximately 130 employees, the regional offices have 230, and the district offices have 940 employees. The Authority received information in the answer to the pre-mission questionnaire that the NFSA has no staff exclusively dedicated to deal with rabbit meat, farmed and wild game meat but that these tasks are integrated parts of the portfolio of the NFSA’s three administrative levels.

The NFSA drafts instructions and administrative provisions with regard to rabbit meat, farmed and wild game meat. Within the NFSA administrative decisions are adopted by the district offices. Any appeal following these decisions is considered by the regional offices.

Five different national centres having been assigned special tasks are located at different regional offices. The national centres have no legal power and take instructions only from the head office, but are administratively organised under the respective regional office. The National Centre of Animals and Food is located at the regional office in Sandnes. Information was received by the Authority in the answer to the pre-mission questionnaire
that the National Centre of Animals and Food provides technical and administrative support to the NFSA at all levels but has no employees dealing exclusively with rabbit meat, farmed and wild game meat.

The mission team took note of the pure advisory role designated to the National Centre of Animals and Food. During the mission, there was no indication at regional, district or establishment level that such advice had been given or asked for.

Representatives of the NFSA's head office and regional offices informed the mission team that they were not supposed to be involved in supervision of establishments. In particular the regional offices considered themselves as a level of appeal and mainly responsible for administrative and economic affairs. It was observed that the district offices were not supervised or guided by neither the head office or the National Centre of Animals and Food nor the regional offices.

6.1.2 Co-operation between the different levels of the NFSA
In the opening meeting, a NFSA head office representative informed the mission team that every year at least one meeting on meat inspection takes place to ensure a co-ordinated approach. At these meetings, lasting for two days and organised by the National Centre of Animals and Food on behalf of the head office, most of the regional offices and all district offices are represented. So far, rabbit meat, farmed and wild game meat have not been covered at these meetings. Furthermore, at the opening meeting a representative of the head office informed the mission team that, in order to co-ordinate the activities between the head office and the regional offices, monthly meetings take place. However, so far, rabbit meat, farmed and wild game meat have not been covered at these meetings.

The mission team was informed by the NFSA's head office that it does not audit or inspect the regional offices or the district offices, and that the regional offices do not inspect the district offices. A representative of the NFSA's head office informed the mission team during the opening meeting that there has been a project initiated by the head office on internal control activities. It is, inter alia, foreseen in the project that the head office will audit the regional and district offices.

With regard to co-ordination between the regional offices and the district offices, a NFSA representative informed the mission team at the opening meeting that it is up to the individual regional offices to decide how to interact with their district offices.

With regard to communication between the National Centre of Animals and Food and the rest of the NFSA, the mission team observed that it was for the different offices of the NFSA to decide on the practise for requesting support from the National Centre of Animals and Food and that procedures for distribution of information from that National Centre had not been established. However, an overall technical knowledge in all fields related to rabbit meat, farmed and wild game meat was expected from all individuals operating on the local level.

6.1.3 Prioritisation of controls/Reporting procedures
According to the answer to the pre-mission questionnaire, activities are prioritised on the basis of international obligations, legal requirements, risks and financial factors. However, there was no indication of training in how to carry out risk assessments. Criteria to perform risk assessment had not been communicated to the regional offices or district offices.
In the opening meeting a representative of the head office informed the mission team that it is for the regional offices to prioritise their activities and make use of the allocated resources. No information was received by the mission team on centrally or regionally distributed criteria for prioritisation of controls. However, it was observed by the mission team that one regional office (Buskerud, Vestfold og Telemark) still used the criteria established by the former competent authority to classify establishments and to allocate a pre-determined inspection frequency while another regional office used the criteria used in the national project on risk analysis expected to be applied within the next two years.

The supervision performed by the district offices of establishments was not controlled by the head office. It was observed by the mission team that out of three regional offices visited, one (Trøndelag, Møre og Romsdal) had started in 2006 to inspect its district offices, contrary to the information received by the mission team from the NFSA's head office in the opening meeting. However, the district office visited by the mission team was not planned to be visited by the regional office this year, although one of the biggest Norwegian slaughterhouses is located in that district as the focus was on border inspection posts and budgetary matters, and not on issues such as official meat control.

In the answer to the pre-mission questionnaire and at the opening meeting the NFSA informed the Authority that there is a routine requiring that the official veterinarian shall issue a report after each inspection of an establishment and a report following the annual audit of the establishment's own-check system. Furthermore, the district offices are supposed to send an annual report to their respective regional office on faults and shortcomings and an annual summary report to inform the regional office on the overall status of each establishment. The routine also includes submission of annual summary reports from the regional offices to the head office. These reports should also contain a list of shortcomings and relevant figures such as the number of suspended establishments. Finally, the regional offices are supposed to inform the National Centre of Animals and Food on the status of the individual establishments.

Reports from official inspections were observed in all establishments. However, the frequency of the inspections and the content of the reports differed to a large extent. The centrally established system for reporting on establishments (Tilsynsrapport) including due dates for the reports and a colour code indicating the severity of the findings and a predefined way of following them up, was only implemented in one of the districts visited during the mission. The routines to report on establishments between the different levels of the NFSA, as described above, were found not to be communicated within the NFSA. Only in cases of major problems observed by the district offices in the establishments and in cases of complaints, the information on individual establishments was sent to the regional offices. It was therefore not possible to verify the functioning of this routine. Reports made at the regional level mainly dealt with budgetary issues and, partly, with animal diseases.

According to information received from the district offices, all inspection and audit reports are stored in a central archive system, which is accessible to all levels of the NFSA. At the regional offices visited, and according to information received by the mission team from representatives of the National Centre of Animals and Food and the NFSA's head office, the information entered into this system was not followed-up.

With regard to wild game meat, it was observed by the mission team that the head office used, as the source of information, the hunting statistics from the nature and conservation
authorities and those of the National Veterinary Institute regarding residues. No information from the other levels of the NFSA regarding wild game meat production, export or import was available at the head office except on the received amount of intra-Community trade.

6.1.4 Recruitment and training
The official veterinarians in Norway are employed as civil servants by the NFSA to carry out the control according to the legislation related to rabbit meat, farmed and wild game meat.

In the opening meeting, it was confirmed that the training course on farmed and wild game meat announced in the Norwegian answer to the report following from the 2001 mission, had taken place in September 2002. Since then, no further courses with regard to rabbit meat, farmed and wild game meat had been held.

In the answer to the pre-mission questionnaire, the NFSA informed the Authority that on district level training courses had been arranged regularly for hunters and that instructions and guidelines addressed to them have been issued. It was observed by the mission team that some information for hunters was available on the NFSA's homepage. Only one of the three district offices visited had once held a short course for hunters.

6.2 Veterinary supervision of establishments
6.2.1 Approval, suspension and withdrawal of approval
In the opening meeting the NFSA informed the mission team that it is the district offices that are given the power, by delegation, to approve establishments producing and marketing rabbit meat, farmed and wild game meat in accordance with Council Directives 91/495/EEC, and 92/45/EEC. They are also empowered to suspend and withdraw such approval. Before approval, an official veterinarian evaluates whether the establishments are complying with the requirements laid down in the Norwegian legislation. There is a guideline, originally drawn-up by the former competent authority, for official veterinarians on how to inspect establishments. In case of suspension or withdrawal of approval, establishments may register a complaint. Decisions upheld by the district offices can be appealed to the regional offices.

The National Centre of Animals and Food allocates the approval number to establishments on request by the district offices. The district offices are responsible for updating the lists of approved establishments for the production of rabbit meat, farmed and wild game meat. It was observed that the National Centre of Animals and Food did not follow-up if the lists had been updated by the district offices and if the guidelines on updating the lists were implemented1. It was further observed by the mission team that for all establishments visited there were discrepancies between the production in the establishments, the approval documentation and the information contained in the list of approved establishments. For example, one establishment approved for slaughter and cutting of farmed game meat was only listed as a slaughterhouse for national production. Furthermore, the establishment was approved, but not listed, for production of meat products even though it lacked the necessary facilities for such production.

It was observed by the mission team that the head office and the National Centre of Animals and Food had no information available about possible suspensions of approval of

1 See point 6.2.1 in the comments from Norway (Annex 2) for comments and information on corrective action provided by NFSA.
establishments since 2001. The mission team was informed in the opening meeting that the establishments can be suspended for a maximum period of six months. The mission team did not receive information concerning the withdrawal of the approval, and in particular, if this was automatic or not after the six months period of suspension, although, it was observed that an establishment had just been suspended for more than six months.

The mission team observed that another establishment approved for slaughtering of rabbit and farmed game meat was still on the list of EEA approved slaughterhouses for rabbit and farmed game meat although it had been closed six months ago.

The list of collection centres approved for the national market only did not reflect the actual situation since closed centres were still on the list while others in use were not included in the list. Finally, the list of approved mobile slaughterhouses for reindeer, which included one establishment which had been closed more than two years ago, was not published.

It was observed by the mission team that slaughterhouses for farmed game meat were approved for seasonal slaughter only, which implied that, in accordance with the Norwegian legislation, no storage facilities for arrested carcasses and no chilling facilities were required. It was also observed that one district office always granted a limited approval for a seasonal farmed game meat slaughterhouse to be renewed every season while other district offices did not set a time limit.

It was observed that mobile slaughterhouses for farmed game meat were approved provided that they fulfill the requirements of fixed or seasonal slaughterhouses "with the necessary alterations" as mentioned in the Norwegian legislation. The mission team received no information during the mission on the standards to be fulfilled by these establishments or on the derogations, if any that could have been granted by the NFSA. It was observed by the mission team that all mobile slaughterhouses for farmed game meat were approved for the production for the national market only.

In the opening meeting, the mission team was informed by the head office² that mobile slaughterhouses for farmed game meat received several approval numbers. This was due to the fact that the locations where the mobile slaughterhouses were used also had to be approved in order to ensure that, inter alia, electricity and water for human consumption would be available. However, it was observed on-the-spot that this approach was not followed by all the district offices. Consequently, some mobile slaughterhouses had several approval numbers while others had only one.

The mission team received information from the NFSA in the opening meeting that no slaughterhouse was approved for slaughter of rabbits in Norway as the approval of the only slaughterhouse expired on 11 September 2006. However, the mission team observed that the approval documentation did not clearly indicate that the establishment had received a time-limited approval.

In the answer to the pre-mission questionnaire the Authority was informed that Article 1(3) of the Norwegian Regulation 1996-02-02 No. 132 grants a derogation for small producers delivering rabbit meat and farmed game meat directly to consumers intended for use in their household. Accordingly, animals slaughtered by those producers must not pass via an approved establishment. The information received from the NFSA by the mission

² See point 6.2.1 in the comments from Norway (Annex 2).
team during the mission did not contain a definition of these "small producers" and whether it exists a defined maximum production capacity. No data was made available to the mission team on the amount of rabbits slaughtered in Norway for private consumption.

In the answer to the pre-mission questionnaire, the Authority was informed that only one slaughterhouse is approved for slaughtering of farmed game birds in Norway.

In the answer to the pre-mission questionnaire, the Authority received information, which was further confirmed during the mission, on the existence of wild game meat processing houses approved for production for the national market only. The answer to the pre-mission questionnaire also contained information on the existence of collection centres approved for handling wild game meat for the national market only, so called control places. According to information received in the opening meeting from the NFSA's head office, it is the official veterinarian who locally decides which facilities are necessary for such collection centres. The mission team was informed that these collection centres approved for the national market only can be approved on an ad hoc basis for only one day.

One game meat processing house visited was also an EEA approved cutting plant for meat from domestic animals. Representatives of the district office informed the mission team that, as cutting of meat from domestic animals had not taken place for more than a year, this activity was no longer subject to veterinary supervision. However, the approval had not been withdrawn by the district office. Furthermore, due to difficulties in respecting the 18 hour rule to present game meat for post-mortem inspection, the establishment's management decided to no longer perform as a wild game meat processing house but as a collection centre approved for the national market only. The district office had reduced the level of veterinary supervision but did not withdraw the approval as an EEA approved wild game meat processing house. Furthermore, the nature and amount of production did not reflect the change from a game meat processing house to a collection centre.

One collection centre visited approved for the national market only was situated in an establishment also approved for cutting, production and storage of meat products for the EEA market. It was observed that the establishment operated as a wild game meat processing house and not only as a collection centre. The mission team received information on-the-spot concerning the fact that the establishment was approved as a collection centre and a wild game meat processing house for the national market. However, this was not reflected in the veterinary supervision and on the list of establishments.

6.2.2 Official control in the establishments
The mission team identified the following shortcomings not previously revealed by the NFSA:

a) Approval was maintained despite the fact that activities were no longer carried out, in some cases for several years as observed regarding seasonal reindeer slaughterhouses, and despite the fact that veterinary supervision was no longer carried out.

b) The approval and listing of approved establishments did not correspond. Furthermore, additional lists of approved establishments existed on district level, which had not been communicated to the other levels of the NFSA.

c) Not all facilities were approved and listed, inter alia, chilling facilities in the slaughterhouses.
d) Establishments maintained approval for activities although they did not comply with the requirements (pâté cooking in one establishment, repacking and sausage production in two establishments).

e) It could not be demonstrated to the mission team how the slaughterhouse for farmed game meat ensures traceability/separation of meat for national market and meat for the EEA market. There was no evidence of this being subject to veterinary supervision.

f) One district office accepted that all carcasses arrived in the processing house after having been dehided outside approved establishments under unknown hygienic conditions.

g) In both game meat processing houses visited it was accepted by the district offices that the establishments were considered to be collection centres in order to allow for post-mortem control to be performed more than 18 hours after the killing of the animals.

6.2.3 Ante-mortem and post-mortem control

In one of the farmed game meat slaughterhouses visited, the daily records contained no details on the post-mortem findings. There was only one daily form covering all arriving animal transports. The official veterinarian signed the transport document not on arrival but once he had inspected the animals. It could not be documented that the official veterinarian was present during unloading. It was also not possible to connect shortcomings occurred during transport to the transporting agent and to the owner of the animals.

A representative of one of the district offices visited informed the mission team that in this slaughterhouse for farmed game meat, ante-mortem inspection was performed by the private practitioner responsible for the herd, as it would be impossible for an outsider to approach the animals.

The mission team was informed by the official veterinarians on-the-spot that the green offal was not subject to post-mortem inspection in the visited slaughterhouses for farmed game meat.

A representative of the head office informed the mission team that there was no requirement or standard form concerning the information to be supplied by the hunter to the official veterinarian as regards the behaviour of the animal before the killing. However, in one game meat processing house receiving most of the animals from two owners of the surrounding hunting areas, the mission team observed two different labelling systems. These labelling systems had been established by the owners of the hunting areas. The labels indicated, inter alia, the place and time of hunting and one system also provided information on behaviour of the animal before the killing.

With regard to wild game meat, the mission team was informed by representatives of the district office on the existence of a post-mortem record and a record of condemned carcasses. However, in the collection centres approved for the national market only, carcasses were not identified as being not fit for human consumption in a way that they were clearly distinguished from wild game meat fit for human consumption. Furthermore, the wild game meat not fit for human consumption stayed with the hunter after the post-mortem control. In the game meat processing houses such carcasses were not handed out to the hunter but confiscated.
6.2.4 Trichinae control
In the opening meeting, the mission team was informed by the Norwegian authorities that wild boar is no longer covered by the Norwegian Trichinae regulation. However, so far no wild boar has migrated from Sweden to Norway as stated by the NFSA in the opening meeting.

6.2.5 Traceability
In several establishments, in particular those processing wild game meat where the official veterinarian was not always present, the mission team observed that the registers on incoming animals or meat did not enable the official veterinarian to supervise the number of incoming animals or incoming meat as well as the products leaving the establishments. These observations were also made in establishments approved for production for the EEA market and for marketing on the national territory only within the same facilities. However, one processing house could demonstrate to the mission team a well functioning traceability system. This was due to the fact that only one carcass was cut at a time because 95% of the received wild game meat (elk) went back to the hunters who insisted on having back all the meat from the animal they had hunted.

In one slaughterhouse for farmed game meat, it was observed by the mission team that parts of the facilities were used by an independent EEA approved meat production establishment. From the meat production establishment's documentation on incoming and outgoing meat received by the mission team, it could not be demonstrated that only EEA approved raw material was used to produce EEA approved meat products.

In the same establishment the mission team observed several re-used fruit cartons filled with unidentified birds only wrapped in plastic film (possibly quail or grouse). The mission team invited the NFSA to follow-up the matter. However, the mission team did not receive any further information.3

In the slaughterhouse for farmed deer visited by the mission team, it was observed that unfinished and unidentified meat products were received from another establishment. After finishing the processing, the final products received the health mark of the establishment visited by the mission team. However, there were no records on the transfer between the two establishments. Furthermore, meat products completely produced in this second establishment with raw material originating in the visited deer slaughterhouse were received, individually packed and health marked with a label bearing the name of the visited deer slaughterhouse in combination with the approval number of the second establishment. Also in this case there were no records maintained on the transfer between the two establishments. The repacking activities were not covered by the establishment's approval.

6.2.6 Health marking
The mission team identified the following shortcomings that had not been previously revealed by the NFSA:

a) Two establishments applied on their products the health marks of other establishments.

b) Some unidentified final products were observed in most of the establishments visited, which had been subject to processing these establishments were not equipped for. However, all these unidentified products were health marked with the health mark of the establishments visited.

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3 In the second point 6.2.1 in the comments from Norway (Annex 2), NFSA provided information on corrective action.
c) Product labels from other establishments than the visited ones were observed bearing the health mark of the establishment visited.

d) A squared health mark indicating "EFTA" was observed.

e) In one wild game meat processing house carcasses were not marked with a health mark bearing the establishment's approval number. Instead, the carcasses were marked with a control stamp bearing the registration number of an official veterinarian. Such a control stamp should only be used for meat control performed outside approved establishments.

f) Wild game meat cut in an EEA approved cutting plant for limited capacity was labelled with a label bearing as a health mark the official identification number of an official veterinarian. The approval number of the establishment did not appear on the label.

The mission team did not observe any corrective action taken on-the-spot by the district office when these shortcomings were identified by the mission team.

In the answer to the pre-mission questionnaire, the Authority was informed that the health mark for wild game meat, produced in establishments approved for the national market only, is a square with 5 cm long sides, the letters at least 0,8 cm tall and the figures at least 1,0 cm tall, containing the following information:

a) In the upper line "NORGE" in capital letters.

b) In the middle the number given to the local competent authority

c) In the lowest line "N" in capital letters.

6.2.7 Veterinary supervision of own-check systems and staff training programmes

In the answer to the pre-mission questionnaire, the Authority was informed that the guidelines drawn-up by the former competent authority providing guidance on the control of own-check systems (Internkontrollveilederen) are still in use. Accordingly, the own-check systems should be audited once a year by the official veterinarian responsible for the establishment. However, it was observed that the own-check systems in the establishments visited had not been audited by the official veterinarian once per year. In some of the district offices visited, in particular in the north of Norway, this could have been due to lack of financial or personnel resources.

In the answer to the pre-mission questionnaire, the Authority received information that out of 509 establishments approved for wild game meat, 206 have been registered in the reporting system "animalia" as having a "well functioning own-check system". Furthermore, out of 189 establishments producing rabbit meat and farmed game meat, 177 have been registered with a "well functioning own-check system". The mission team received no further information on this reporting system or on any criteria established to decide what would be such a "well functioning own-check system". The mission team was informed by the official veterinarians in the establishments that they decide individually on the status of the establishments' systems. The mission team did not receive any information from the NFSA about possible actions taken against establishments not having a "well functioning own-check system".

The Authority received information, in the answer to the pre-mission questionnaire, that the official veterinarians are not involved in staff training programmes related to farmed or wild game meat.
6.3 Visit to establishments
In the establishments approved for both placing of game meat on the EEA market and production for marketing on the national territory, the mission team observed that the layout was not designed to ensure separation of the two productions.

In one establishment approved for slaughter and placing on the EEA market of farmed game meat, major deficiencies with regard to housekeeping were observed. For example, unused machinery was stored in production rooms and the storage room for packaging material was also used to store cleaning equipment, and herbs and wood for smoking of meat products. Furthermore, the mission team observed deficiencies with regard to maintenance and cleaning, such as rusty rails and rusty hand wash basins, flaking paint and dust. Finally, the establishment hosted another company producing meat products. However, several required facilities for such a production, like for the storage of herbs and ingredients, the storage of wood used for smoking and a room for smoking were missing.

In the slaughterhouse for farmed deer the facilities were not suitable for the production of meat products which the establishment was also approved for. However, the size and layout appeared to be sufficient for slaughtering of farmed deer. With regard to maintenance and cleaning of the slaughter room the mission team observed only some few places with flaking paint and one not corrosion resistant piece of equipment.

In one wild game meat processing house visited, the mission team observed a mezzanine in the reception area and some flaking paint.

In the second wild game meat processing house visited the chilling capacity was insufficient for the production actually taking place. Consequently, the carcasses were touching the floor and walls, and the separation between carcasses not yet inspected and carcasses health marked for human consumption could not be respected. Furthermore, the layout did not allow for a clear separation between clean and unclean areas. Finally, flaking paint and exposed wood, a defect door to the freezer for condemned products and condensation in the expedition chiller were observed by the mission team.

The collection centre approved for the national market only consisted of a single room with wooden walls and ceiling, and an adjacent chiller with wooden walls and ceiling.

6.4 Certificates and trade documents
In the answer to the pre-mission questionnaire, the Authority received information that no commercial documents are required if the farmed or wild game meat goes directly from an establishment to the consumers. According to the NFSA the definition of consumers also includes restaurants.

6.5 Residues
According to the answer to the pre-mission questionnaire, a high percentage of the samples examined in 2004 contained lead. Despite this, representatives of the NFSA informed the mission team at the opening meeting that sampling and analyses for lead had not been carried out since 2004 due to mission resources.

A representative of the NFSA’s head office informed the mission team that the content of radioactive Caesium in reindeer following the Chernobyl accident is still too high for reindeer meat to be exported from the southern part of Norway.4

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4 See point 6.5 in the comments from Norway (Annex 2).
6.6 Zoonoses
Norwegian farmed reindeer migrates and does not live in closed areas. Representatives of the NFSA's head office informed the mission team that such herds are therefore not regularly inspected by an official veterinarian. However, the mission team observed that the deer farm visited had been regularly inspected.

In the opening meeting representatives of the NFSA informed the mission team that hunters shooting sick wild game have an interest to notify the NFSA since such animals will be deducted from their hunting quota.

6.7 Animal identification
A representative of the NFSA's head office informed the mission team that identification of farmed reindeer varies between different parts of Norway. It was observed that in the north of Norway farmed reindeer were either marked with traditional cuts in the ears identifying the owner, or with ear cuts and one ear tag. In order to identify the owner of a reindeer via the ear cuts it is necessary to have both ears and the official veterinarian must have the necessary knowledge about the different combinations of cuts used. The mission team observed that the official veterinarian at the slaughterhouse visited had this knowledge. In the more southern parts of Norway reindeer are mostly identified by ear tags. These have a colour code of 10 colours for the year of birth and the owner. The mission team received information from the official veterinarians that it is not possible to relate mother and offspring to each other and that reindeer usually do not loose the ear tags easily.

At the deer farm visited the animals were identified with one ear tag. Each animal had an individual number and a related health record.

6.8 Animal welfare
At the EEA approved slaughterhouse for farmed game meat the slaughter of reindeer was not seen in operation although this had been requested by the mission team in preparation of the mission. Therefore, handling of the animals, stunning and bleeding could not be assessed.

The animals observed by the mission team on the deer farm annexed to the slaughterhouse visited were well kept and seemed to be in a good condition.

It was observed by the mission team that the slaughterhouses for farmed deer had received a separate approval to stun the animals with a rifle to avoid stress for the animals.

7 Final meeting
A final meeting was held on 20 October 2006 at the head office of the NFSA in Oslo. At this meeting the mission team presented the main findings and some preliminary conclusions of the mission. The NFSA was invited by the mission team to provide information or to comment on the main findings and preliminary conclusions.

At the meeting, the mission team also explained that, based on a more detailed assessment of the information received during the mission, additional conclusions could be included in the report.
The Norwegian representatives took note of the findings and the preliminary conclusions presented. They did not comment on the main findings and the preliminary conclusions presented, and did not express any disagreement.

8 Conclusions

8.1 Overall conclusion

Norway indicated in its response to the 2001 report on rabbit meat, farmed and wild game meat that it had taken a number of corrective actions. However, on-the-spot the mission team observed that these were not put in place. Hardly any evidence of a harmonised approach and a flow of information within the NFSA regarding the supervision and approval of rabbit meat, farmed and wild game meat establishments were observed. Consequently, full compliance with Article 14(3) of Council Directive 91/495/EEC could not be ensured.

8.2 The Competent Authority

8.2.1 Compliance with Articles 6(3), 14(1) and 14(2) of Council Directive 91/495/EEC and Article 7(1) of Council Directive 92/45/EEC could not be ensured since a number of deficiencies were observed regarding approval and withdrawal of approval of establishments, and of supervision and listing of approved establishments.

8.2.2 Compliance with Article 3(1)(b)(ii) of Council Directive 92/45/EEC could not be ensured since there were wild game meat processing houses approved for the national market only. Furthermore, compliance with Article 3(4)(i) of Council Directive 92/45/EEC could not be ensured since a health mark for wild game meat products for the national market only had been drawn up. As a consequence, Point 1 of Chapter V of Annex I to Council Directive 91/495/EEC was not complied with since game meat was not inspected within 18 hours after arrival at the game meat processing house.

8.2.3 The nationally introduced category of control places (collection centres approved for the national market only) did not fulfil the requirements for collection centres laid down in Article 3(1) of Council Directive 92/45/EEC. In addition, they were also used for dehiding which is not in compliance with Point 6 of Chapter III of Annex I to Council Directive 92/45/EEC.

8.2.4 Full compliance with Article 14(1) of Council Directive 91/495/EEC and Article 7(1) of Council Directive 92/45/EEC could not be ensured since the lists of approved establishments were not comprehensive as there were additional local lists which had not been sent to the Authority.

8.2.5 Full compliance with the requirements laid down in Article 6(1) of Council Directive 91/495/EEC and Article 3(1)(a) and 3(1)(b) of Council Directive 92/45/EEC could not be ensured since shortcomings on the information needed, used as a basis for inspections, were observed. In particular, there were no steps taken to either train all personnel in risk assessment or to ensure that all relevant information would reach personnel performing such an assessment.

8.3 Veterinary supervision of establishments

8.3.1 Compliance with Article 7(4) of Council Directive 92/45/EEC could not be ensured since the official control in the establishments did not cover all activities carried out, or the establishments were entitled to carry out on the basis of their approval.
8.3.2 Full compliance with Article 7(3) of Council Directive 92/45/EEC could not be ensured since the official veterinarians were not involved in the planning and implementation of staff training programmes.

8.3.3 Full compliance with Article 7(4) could not be ensured since, for instance, there was no evidence that inspection reports were submitted in a systematic way to the operator.

8.3.4 Point 4 of Chapter V in Annex I to Council Directive 92/45/EEC was not complied with since wild game subject to veterinary inspection outside processing houses and found not to be fit for human consumption was not confiscated but left with the hunter. Furthermore, it was not in accordance with Article 4(1) of Council Directive 92/45/EC that meat declared not fit for human consumption in a collection centre could not be distinguished from meat hunted for private consumption and that this meat not fit for human consumption was not disposed as animal waste.

8.3.5 Full compliance with Point 6 of Chapter III of Annex I to Council Directive 92/45/EEC was not ensured insofar as, at least, in one game meat processing house the NFSA accepted all carcasses of large game meat to arrive dehide.

8.3.6 Full compliance with Chapter VII of Annex I to Council Directive 92/45/EEC was not ensured since not all carcasses of wild game meat were health marked in accordance with the provisions of that Chapter.


8.3.8 Inspections of approved establishments for the production of meat products did not fully comply with the requirements of Council Directive 77/99/EEC and in particular Article 8(1) thereof.

8.4 Establishments visited

Full compliance with Article 6(1) and 14(2) of Council Directive 91/495/EEC and Article 3(1)(b) of Council Directive 92/45/EEC could not be ensured as deficiencies were found related to maintenance, cleaning, structure and layout.

9 Recommendations to the Competent Authority

9.1 The NFSA should take appropriate action in order to ensure compliance with the requirements of Council Directives 91/495/EEC and 92/45/EEC, in particular related to approval and official supervision of establishments.

9.2 Further training and guidance is needed to enable the district offices to perform all tasks they are responsible for. This applies in particular to approval and withdrawal of approval of farmed and wild game meat establishments, the veterinary supervision of such establishments including risk assessments, checking of traceability and health marking, and audits of own-checks systems.5

9.3 Norway should notify to 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

5 In point 9 in the comments from Norway (Annex 2), NFSA provided information on corrective action.
still outstanding, relevant to all the conclusions under Chapter 8 of this report. The Authority should also be kept informed of the completion of measures included in the timetable.
## Annex 1  List of abbreviations and terms used in the report

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<thead>
<tr>
<th>Authority</th>
<th>EFTA Surveillance Authority</th>
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<td>EC</td>
<td>European Community</td>
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<td>EEA</td>
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<td>EEA Agreement</td>
<td>Agreement on the European Economic Area</td>
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<td>NFSA</td>
<td>Norwegian Food Safety Authority</td>
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Annex 2 Comments to the draft report from the Norwegian Competent Authority

The full text of the letter received by the Authority is annexed in the following:

The Norwegian Food Safety Authority (NFSA) would like to make the following comments on the factual content and certain other elements of the report.

6.2.1 Approval, suspension and withdrawal of approval

Comments on the factual content in the second paragraph
The report states that "It was observed that the National Centre of Animals and Food did not follow-up if the lists had been updated by the district offices and that there were no guidelines on updating the lists."
It should be corrected to "It was observed that the National Centre of Animals and Food did not follow-up if the lists had been updated by the district offices." The NFSA has guidelines for updating the lists.
The National Centre of Animals and Food has since the mission, been working on a plan of action in order to improve the lists and the follow-up.

Comments on the factual content in the eight paragraph
The report states that "In the opening meeting, the mission team was informed by the National Centre of Animals and Food that mobile slaughterhouses for farmed game meat received several approval numbers."
It should be corrected to "In the opening meeting, the mission team was informed by the head office that mobile slaughterhouses for farmed game meat received several approval numbers."

6.2.1 Approval, suspension and withdrawal of approval

Comments on the factual content in the third paragraph
Reference is made to the observed re-used fruit cartons filled with unidentified birds. The district office has re-visited the establishment in question and the birds have been removed. Please find attached the inspection report and letters from the establishment.

6.5 Residues

Comments on the factual content in the second paragraph
"…….the content of radioactive Caesium in reindeer following the Chernobyl accident is still too high for reindeer meat to be exported from the southern part of Norway.

9 Recommendations to the Competent Authority

9.2 The NFSA conducted a pilot-course in HACCP in December 2006. The recommendations from this course will be taken into consideration in the next HACCP-course that will be held in January 2007. The NFSA has planned for eight HACCP-courses to take place in the next three months. Please find attached the program for these courses.