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Final report

EFTA Surveillance Authority mission to

Iceland

from 4 to 8 November 2013

regarding the application of EEA legislation related to

the food safety control systems in place

governing the production and placing on the market

of poultry meat and products thereof

There were no comments or additional information from the Icelandic competent authorities to the report. Please note that the corrective actions already taken and planned by the Icelandic competent authorities are included in Annex 3.

Executive summary

This report describes the outcome of a mission carried out by the EFTA Surveillance Authority (the Authority) in Iceland from 4 to 8 November 2013 regarding controls on poultry meat and products thereof. This was the first mission carried out regarding poultry meat by the Authority within the framework of the Food Hygiene Package (Regulations (EC) No 852/2004, 853/2004 and 854/2004) and legislation on official control principles (as laid down in Regulation (EC) No 882/2004 and Regulation (EC) No 178/2002), that was incorporated into the European Economic Area (EEA) agreement and entered into force in Iceland on 1 November 2011. The objective of the mission was to verify that official controls related to poultry meat and products thereof were carried out in compliance with the EEA legislation.

The mission team found that the relevant EEA legislation had been transposed to national legislation. Legal powers were in place to enforce the legislation. The responsible competent authority were clearly designated and comprehensive training has been provided. A quality management system had been launched with written work procedures and instructions for staff in July 2012. A system for risk classification and frequency of official controls had been implemented. However, the system does not currently take into account the reliability of own checks that have already been carried out as required by Article 3 of Regulation (EC) No 882/2004. A multi-annual national control plan was not yet in place in Iceland but was expected to be ready from 2014.

National reference laboratories (NRLs) had recently been appointed for Salmonella and Campylobacter, but at the time of the mission no NRLs had been appointed for Escherichia coli and Listeria monocytogenes as required by Article 33 of Regulation (EC) No 882/2004.

At the time of the mission five poultry meat establishments were listed in Iceland. Three establishments were visited by the mission team. Not all deficiencies found by the mission team had been identified by the competent authority and were therefore not included in the inspection reports. Deficiencies were detected in flow of products and staff, non-appropriate changing rooms, insufficient maintenance, unclear separation of clean and unclean areas, inadequate procedures for cleaning and disinfection, lack of sterilisers in cutting plants and incomplete HACCP-procedures.

Sampling for microbiological testing (Regulation (EC) No 2073/2005) had only started in two out of three establishments visited but did not cover all relevant products or were not applied with the correct sampling frequencies. So far no official samples have been taken to verify the food business operators compliance as regards microbiological testing.

Poultry farms were appropriately registered and under official controls. The farm visited was in compliance with the requirements of Regulation (EC) No 852/2004, Annex I. Identification marking of poultry meat products was applied in line with the EEA legislation.

Serious shortcomings were detected in post-mortem and ante-mortem controls, that were carried out by insufficiently trained slaughter house staff and, in addition, without the presence and supervision from an official veterinarian.

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

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1 Introduction

The mission took place in Iceland from 4 to 8 November 2013. The mission team comprised two inspectors from the EFTA Surveillance Authority (the Authority) and one observer from the Food and Veterinary Office (FVO) of the European Commission.

The opening meeting was held with representatives of the competent authority *Matvælastofnun* (MAST) on 4 November 2013 at the MAST head office in Selfoss. At the meeting the mission team confirmed the objectives and the itinerary of the mission. The Icelandic representatives provided additional information to that set out in the reply to the Authority's pre-mission questionnaire.

Throughout the mission, a representative of the head office of MAST accompanied the mission team. In addition, representatives of the relevant district offices of the MAST participated during meetings at the visits to the different establishments.

A final meeting was held at the MAST office in Reykjavik on 8 November 2013 where the mission team presented its main findings and 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 assess the application by the Icelandic competent authorities of the following EEA Acts, as well as additional legislation in the field of safety of food of animal origin referred to in Annex 2 to this document:

- a) *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* as amended and adapted to the EEA Agreement;
- b) *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 corrected and as amended and adapted to the EEA Agreement;*
- c) *Regulation (EC) No 852/2004 on the hygiene of foodstuffs*, as amended and corrected in the EEA Agreement;
- d) *Regulation (EC) No 853/2004 laying down specific hygiene rules for food of animal origin*, as amended and adapted to the EEA Agreement;
- 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*, as amended and adapted to the EEA Agreement; and
- f) *Commission Regulation (EC) No 2073/2005 of 5 December 2005 on microbiological criteria for foodstuffs*, as amended and adapted to the EEA Agreement.

The mission covered all stages of production of poultry meat and products thereof, 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 poultry meat and products thereof;
- b) The implementation of these requirements by the food business operators.

The evaluation included the gathering of relevant information, and appropriate verifications, by means of interviews/discussions, review of documents and records, and on-the-spot inspections, to demonstrate the normal control procedures adopted and measures in place to ensure that necessary corrective actions were taken when necessary.

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		Opening and final meeting. In addition, representatives from the relevant two district offices of MAST accompanied the mission team during the visits to the establishments and the laboratory.
Slaughterhouses	3	Three poultry meat establishments with multiple approvals as slaughterhouse, cutting plant and meat products/meat preparations plants.
Cutting plants	3	
Meat products and meat preparation plant	3	
Poultry farm	1	Broiler farm
Laboratories	1	Official laboratory appointed as National Reference Laboratory (NRL) for Salmonella.

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) 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*; 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*.

Other legislation relevant for the mission is listed in Annex 2.

4 Background - Previous missions

4.1 Previous missions

This was the first mission from the Authority to Iceland focusing on poultry meat and products thereof within the framework of the Food Hygiene Package. The relevant EEA legislation was incorporated into the EEA agreement on 1 May 2010 and, following a transitional period of 18 months, entered into force in Iceland on 1 November 2011.

The Authority carried out another mission focusing on food of animal origin (red meat, milk and products thereof) within the framework of the Food Hygiene Package to Iceland from 7 to 16 May 2012. The final report from this mission is available on the Authority's website: (www.eftasurv.int)

4.2 Information on production and trade

Information on the quantities of commodities of poultry meat and products thereof produced in Iceland (Table 2), as well as trade data (Table 3) were provided by MAST as follows:

Table 2 (production data on poultry meat and offal, figures from 1 November 2011 to 31 December 2012)

Commodity meat (in tons)	November 2011 to December 2012
Chicken	8704
Turkey	291
Ducks, geese or guinea fowls	0

Table 3 (trade data, i.e. export/trade of poultry meat or products thereof)

Commodity meat (in tons)	November 2011 to December 2012
Chicken	0
Turkey	0
Ducks, geese or guinea fowls	0

According to the information received from MAST (Table 3) no establishments in Iceland exported or traded poultry meat or products thereof to other countries within the EEA or to third countries.

5 Findings and conclusion

5.1 Transposition of EEA legislation

Legal Requirements

Article 7(a) of the EEA Agreement states that, an act corresponding to an EEC regulation shall as such be made part of the internal legal order of the Contracting Parties.

Article 4(2)(e) of Regulation (EC) No 882/2004 requires the competent authority to ensure that they have legal powers to carry out official controls and to take measures provided for.

Findings

According to information received from MAST the Regulations in the Hygiene Package i.e. Regulations (EC) No 852/2004, No 853/2004 and No 854/2004 as well as Regulations (EC) No 178/2002 and No 882/2004 have been incorporated into the Icelandic legal order and have been in force for poultry meat and products thereof since 1 November 2011. In addition, Commission Regulation (EC) No 2073/2005 on microbiological criteria for foodstuffs including poultry meat and products thereof has been incorporated into the Icelandic legal order and has been applicable from 1 November 2011.

According to MAST the Icelandic Foodstuffs Act No 93/1995 provides the legal basis for the competent authorities to enforce this legislation and MAST has all necessary powers to carry out official controls and can access any food business operator at any time.

Conclusions

The national legislation is in line with the EEA agreement according to information provided by the MAST head office and legal powers are in place to enforce the legislation.

5.2 Competent authorities

5.2.1. Designation of competent authorities and their operational criteria

Legal requirements

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

Article 6 of Regulation (EC) No 882/2004 sets out general requirements for training of staff from the competent authority. Article 5(7) and Annex I, Section III, Chapters III and IV of Regulation (EC) No 854/2004 requires competent authorities to ensure that official veterinarians and official auxiliaries receive appropriate training, and are kept up-to-date in their competencies regarding official controls of poultry meat. In addition, member states may allow slaughterhouse staff to assist with official controls in relation to the production of meat from poultry by carrying out certain tasks under the supervision of the official veterinarian, but on the condition that the slaughterhouse staff are qualified and undergo training, act independently from production staff and report any deficiency to the official veterinarian, as required by Article 5(6)(a) and Annex I, Section III, Chapters III and IV of Regulation (EC) No 854/2004.

Findings

According to the information received in the answer to the pre-mission questionnaire MAST is the competent authority controlling the production of poultry meat from farm level to the final product excluding the retail level.

There are six district offices, each headed by a district veterinary officer, that are responsible for the surveillance of production and placing on the market of the poultry products. The six district veterinary offices have official tasks only.

There are currently three poultry slaughterhouses in Iceland located only in two districts, of which all were visited by the mission team. Two official veterinarians under the two relevant district offices in each of the districts are responsible for the supervision of ante-mortem and post-mortem inspections of poultry (see also section 5.3.7). According to the information received by MAST in the initial meeting ante-mortem and post-mortem inspections of poultry are carried out by slaughterhouse staff and the official veterinarian is not permanently present at the slaughterhouses during slaughtering.

According to the information received in the answer to the pre-mission questionnaire staff from MAST from both central and district levels had participated in Better Training for Safer Food (BTSF) from 2012 to 2013 on the following sessions: food hygiene and control, meat and meat products, HACCP, animal welfare at slaughter, animal welfare during transport, animal welfare in poultry breeding, salmonella control, microbiological criteria and auditing. In addition, a number of Technical Assistance and Information Exchange (TAIEX) courses have been held for staff from MAST on HACCP, microbiological criteria, zoonoses and risk classification.

MAST has also arranged meetings and courses for their staffs' own training. According to the answer to the pre-mission questionnaire every new employee receives initial training by MAST's experts on issues they will be working on. When possible a new employee is also trained by an expert on the job they will take over. This has for example been the case for the official veterinarians in the poultry slaughterhouses, as three very experienced veterinarians have left MAST and other veterinarians with less training have started.

The mission team noted that:

- Monthly meetings are organised by the central office of MAST with the district offices, where current issues are discussed.
- In inspection reports from all three slaughterhouses visited, it was confirmed, that joint inspections including representatives from both central and district level of MAST had been carried out.
- In all three slaughterhouses visited, it was confirmed that slaughterhouse staff was performing post-mortem controls as well as occasionally ante-mortem controls. MAST was not able to provide any evidence for training or documentation for regular performance tests concerning meat inspection for the slaughterhouse staff. During the visits to two slaughterhouses in operation, the mission team detected several deficiencies in the performance of the post-mortem controls by the slaughterhouse staff (see also section 5.3.7).

Conclusions

Competent authorities responsible for official controls in the poultry meat sector have been designated as required by Article 4(1) of Regulation (EC) No 882/2004 and training has been provided to the staff of MAST in line with Article 6 of Regulation (EC) No 882/2004. However, training and performance tests have not been carried out for slaughterhouse staff carrying out post-mortem inspection in poultry slaughterhouses, which is not in line with Article 5(6)(a) and Annex I, Section III, Chapter III of Regulation (EC) No 854/2004.

5.2.2. 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, and for reviewing compliance with conditions of approval and for the withdrawal of approvals.

Findings

According to information provided by representatives of MAST, there are five food business operators in the poultry meat sector, of which three have multiple approvals as slaughterhouse/cutting plant/meat product plant (all these three slaughterhouses were visited by the mission team), one has multiple approval as cutting plant/meat product plant and one establishment is approved as meat product plant only. All these five

establishments are included on the MAST list of approved establishments available on the MAST's website.

A working procedure on registration/approval of establishments is in force and is published in the quality management system of MAST. According to the procedure, food business operators apply for approval to MAST and can do it electronically through the website of MAST. Guidelines for the food business operators on application for approval are published on MAST's website.

In addition, the mission team observed that:

- All three poultry establishments visited had a valid approval from MAST.
- In all three approved establishments the mission team noted deficiencies regarding general and specific hygiene requirements e.g. in flow of products and staff, non-appropriate changing rooms, insufficient maintenance, unclear separation of clean and unclean areas, inadequate procedures for cleaning and disinfection, lack of sterilisers in cutting plants and incomplete HACCP-procedures (see also section 5.3.1). These deficiencies were not in all cases reported by MAST in inspection reports, maintenance plans for establishments or in the conditions for approval.
- It was not always apparent from the approvals exactly what products were covered. E.g. the approval did not mention meat preparations even though this product was produced in all three establishments visited.

Conclusions

The procedures for approval are in principle in line with Article 31 of Regulation (EC) No 882/2004. However, establishments had been granted full approval without being fully in compliance with the requirements of Regulations (EC) No 852/2004 and 853/2004. In addition, the approvals seen did not always cover all relevant products.

5.2.3. Prioritisation of official controls

Legal requirements

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

Findings

MAST has implemented a risk classification system for official controls in food business operators since July 2012.

According to information received at the initial meeting the risk classification system has been used to categorise establishments by risk and calculate control frequencies for all sectors. There is an interface between the risk classification model and the database for official controls (see section 5.2.5). The risk based prioritisation of controls are based on two factors, which are respectively a risk classification model and a performance evaluation model.

According to the risk classification model the control frequency of establishments is calculated based on the risk category of the establishment. The risk category is based on three risk factors, which are: 1. The nature of the production and the product, 2. The size of the production or the establishments and 3. The consumer group (production for sensitive consumers, e.g. children under the age of 5, elderly or hospitalised people). The

risk category of each establishment is defined based on the total risk score, and then the risk category corresponds to a minimum control frequency (hours/year).

In addition, according to the performance evaluation model all establishments are also evaluated based on their performance during past controls, and based on their performance they are categorised into three performance categories, A (decreased official controls by 50 %), B (basic control frequency) and C (increased official controls by 50 %).

The mission team noted that:

- According to information received from MAST all food establishments had been placed in risk category B from 1 July 2012 as regards compliance with feed and food law or with animal health when the system was implemented, and the risk classification system did not take into account food business operators' past records before 1 July 2012.
- The established control frequencies do currently not take into account the reliability of own checks that have already been carried out.
- Representatives of MAST informed that normally controls are carried out without prior warning as required in the legislation incorporating Regulation (EC) No 882/2004. Nevertheless, inspections/audits carried out by the districts will often have to be warned in advance (with short notice), when it is necessary to ensure that the right staff from the food business operator and documentation is available.

Conclusions

A system for risk classification and frequency of official controls in line with Article 3(1) of Regulation (EC) No 882/2004 has been in place since July 2012. However, currently the system does not take into account the reliability of own checks that have already been carried out as required by Article 3 (1) of Regulation (EC) No 882/2004.

5.2.4. Official sampling and laboratory analysis

Legal requirements

Article 33 of Regulation (EC) No 882/2004 requires Member States to arrange for designation of national reference laboratories (NRLs). Article 4(2)(c) of the Regulation requires competent authorities to have, or to have access to, adequate laboratory capacity. Article 11 of the Regulation establishes requirements for sampling and analysis and Article 12 requires the competent authorities to designate laboratories that may carry out analysis of samples taken during official controls. It also lays down accreditation criteria for laboratories so designated.

Findings

The Ministry of Industries and Innovation is responsible for designation of NRLs after advice from MAST on which laboratories have the capacity to become NRL.

A laboratory was designated as NRL for Salmonella on 7 March 2013. Another laboratory was designated as NRL for Campylobacter on 8 April 2013.

According to information provided by MAST to the mission team, MAST designates laboratories to carry out analysis of samples taken during official controls. Four laboratories have been designated to handle all official samples taken in Iceland (the list of these laboratories is available on the website of MAST). These four laboratories are accredited according to the international standard EN ISO/IEC 17025 on the general requirements for the competence of testing and calibration of laboratories.

The mission team noted that:

- NRLs have not yet been appointed for *Escherichia coli* and *Listeria monocytogenes* for Iceland (see also section 5.3.3).
- The NRL for *Salmonella* was visited by the mission team. A representative for the NRL for *Salmonella* had participated in the yearly meeting organized by the EU-RL for *Salmonella* in the Netherlands in the spring 2013. In addition, the NRL had participated in one proficiency testing organised by the EU-RL in October 2013, but the results were not yet received at the time of the mission.
- The NRL for *Salmonella* had documentation for accreditation from SWEDAC (Swedish accreditation body) covering 28 accredited methods including for food analysis: *Salmonella*, *Escherichia coli*, *Listeria monocytogenes*, *Campylobacter*, *Clostridium perfringens*, total plate count, etc.
- The NRL for *Salmonella* was using the method from the Nordic Committee on Food Analysis (NMKL) no 71. The NRL had documentation in the form of a study from the NMKL comparing the method with the relevant ISO method. On this basis the NRL considered the method NMKL no 71 to be equivalent to the ISO method (EN/ISO 6579).
- The NRL for *Salmonella* had not contacted the other three appointed official laboratories for *Salmonella* in Iceland, because so far no official samples have been taken by MAST to verify meat establishments' compliance with Regulation (EC) No 2073/2005 (see also section 5.3.3).

Conclusions

NRLs have recently been designated for *Salmonella* and *Campylobacter*. So far NRLs for *Escherichia coli* and *Listeria monocytogenes* have not been designated, which is not in compliance with Article 33 of Regulation (EC) No 882/2004.

5.2.5 Procedures for performances and reporting of control activities

Legal requirements

Article 8 of Regulation (EC) No 882/2004 requires official controls to be carried out in accordance with documented procedures, containing information and instructions for staff performing official controls. Article 9 of the same Regulation requires the competent authority to draw up reports on the official controls that it carries out, describing the purpose, the control methods and the results of the official controls and, where appropriate, the corrective action that the food business operator is to take.

Findings

A special database with a quality management system based on ISO standard 9001:2002 has been launched since July 2012. At the same time a quality manual for official controls has been published on the website of MAST and is the basis for the official controls carried out by staff of MAST. The database contains all written working procedures and instructions for staff. There are instructions and checklists for e.g. approval and registration of food business operators, an inspection handbook for products of animal origin, a handbook for official controls in slaughterhouses including poultry slaughterhouses, instructions for assessment of good hygiene practices (GHPs), instructions on microbiological criteria and HACCP based systems, etc.

The database is accessible to the staff of MAST by password access through the internet. The database is linked to the list of approved establishments and the risk classification system for official controls (see also section 5.2.3).

The mission team noted that:

- All inspection reports must be put into this database. In the database updated instructions had recently been issued regarding enforcement of the relevant legislation. In addition, new instructions had been issued concerning audits of HACCP-based systems (see also section 5.3.2).
- For all three food business operators visited, evidence of official controls was available in the form of inspection reports.

Conclusions

MAST has implemented a system with harmonised procedures for performance and reporting of official controls in line with the requirements of Article 8 and 9 of Regulation (EC) No 882/2004.

5.2.6 *Enforcement measures*

Legal requirements

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

Findings

According to the instructions in the quality manual system (see section 5.2.5) of MAST, non-compliances noted during inspections in food business operators must be followed up depending on the seriousness of the irregularity detected. Enforcement actions are classified in three categories: The mildest form of enforcement is a verbal remark, where the non-compliance can be corrected immediately. If a more serious non-compliance is detected, it has to be corrected before next scheduled inspection (i.e. no deadline is given by MAST for correction), and for the most serious non-compliances, a short deadline is given for corrective actions to be taken by the food business operator.

A non-compliance that has not been corrected at the next regular visit will be given the status serious and is to be followed up by a special procedure for enforcement measures. A short deadline is given for corrective actions and sanctions as temporary suspension of activities for parts or all of the production are foreseen. The inspection reports include information on these procedures so the food business operator is aware of possible consequences.

The mission team noted that:

- In the food business operators visited during the mission the above procedures on the inspection were followed and non-compliances noted. However, it was not clearly indicated in the follow-up visit that non-compliances were controlled again in the following scheduled visit. Representatives of MAST informed that the non-compliances were actively taken out of the report when checked again and that if

they were not checked they would re-appear in the next report and would trigger the enforcement procedure.

- An instruction for enforcement of the legislation had recently been updated. However, the mission team did not receive evidence of use of sanctions or other enforcement measures against establishments in the poultry sector during the mission.

Conclusions

Procedures for enforcement are in place for inspections in line with Article 54 of Regulation (EC) No 882/2004. However, timely action was not in all cases taken for enforcement when non-compliances were detected.

5.2.7 Verification and review of official controls and procedures

Legal requirements

Article 8 of Regulation (EC) No 882/2004 states that the competent authorities must have procedures in place to verify the effectiveness of official controls and to ensure that corrective action is taken when needed and that documented procedures on official controls are updated as appropriate. Article 4(6) of the Regulation requires competent authorities to carry out internal audits, or have external audits carried out. These must be subject to independent scrutiny and carried out in a transparent manner. Article 41 of Regulation (EC) No 882/2004 requires that each Member State prepares a single integrated Multi-Annual National Control Plan (MANCP).

Findings

The mission team noted that:

- All inspection reports are put into the central database (see section 5.2.5),
- As foreseen in the quality management system, one internal audit covering the meat sector including poultry meat has been carried out by MAST central level in the autumn of 2012 as a desk analysis after the new system was introduced in July 2012. These audits were mainly designed to evaluate the performance of staff. According to information received from MAST there are future plans to establish an internal audit committee and a steering committee with representatives from the Ministry of Industries and Innovation, consumer organisations, industry etc. in order to further develop audit procedures for official controls.
- Some inspection reports were seen, where the follow-up of the documented shortcomings detected had not been done or the follow-up was not sufficiently documented (see also section 5.2.6). In general, there was no deadline issued by MAST for the food business operator to correct deficiencies detected during official controls, since the deficiencies were not considered serious enough by MAST (see also section 5.2.6).
- MAST is working on a three-year Multi-Annual National Control Plan (MANCP) which is expected to be completed in the beginning of 2014. The MANCP being developed will cover the years 2014-2017.
- In order to help devise and structure the MANCP Iceland participates in the expert network on National Control Plans and Annual Reports organised by the FVO.

Conclusions

An internal audit within the scope of this mission has been carried out on staff performance in 2012. However, corrective actions are not in all cases taken or documented when needed as required by Article 8(3)(b) of Regulation (EC) No 882/2004. In addition, a MANCP is not yet in place in Iceland, which is not in line with Article 41 of Regulation (EC) No 882/2004.

5.1 Official controls on food business operators' compliance with hygiene rules

5.3.1 General and specific 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, site layout and size of food premises.

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 for food of animal origin. Article 4(3) of Regulation (EC) No 852/2004 states that food business operators shall adopt specific hygiene measures regarding compliance with microbiological criteria for foodstuffs, compliance with temperature control requirements and sampling and analyses.

Article 4(2) of Regulation (EC) No 854/2004 specifies that the competent authorities shall carry out official controls in respect of products of animal origin to verify food business operators' compliance with these requirements. Article 4(3) of Regulation (EC) No 854/2004 specifies that the competent authorities shall carry out audits of good hygiene practices.

Findings

The following deficiencies were identified by the mission team during the visits which had not previously been noted by MAST and therefore not been included in the inspection reports for the establishments:

- In a poultry slaughterhouse with an attached cutting plant and meat products plant, deficiencies were noted in relation to changing facilities and the flow of staff. Lack of maintenance was noted of walls, floors and ceilings in both the production room, the attached cutting rooms and a freezer. Condensation problems were seen with water dripping on to exposed meat. Water from an adjacent room with a dish washer facility was flowing into a cutting room area, due to the way floors were constructed. Animal by-products were not collected in marked containers.
- In another poultry slaughterhouse with an attached cutting plant and meat products plant, deficiencies were noted in relation to flow of staff, since there was only one entrance door for all staff leading through the slaughterhouse to both cutting plant and meat production area (for heat treated ready-to-eat products). In addition, deficiencies were noted for changing facilities for staff mainly due to insufficient space. Animal by-products were stored in containers, that were not clearly marked for this purpose.

- In a third poultry slaughterhouse with an attached cutting plant deficiencies were noted in the flow of products in the cutting room due to lack of proper separation between packing area and cutting area. In addition, in the attached meat products area, where a heat treated ready-to-eat product was produced, there was lack of proper separation between a washbasin and a packing area with risk of contamination to the ready-to-eat heat-treated poultry products.

The following specific hygiene deficiencies were identified by the mission team during the visits which had not previously been noted by MAST:

- In one slaughterhouse with attached cutting plant there were no cooling facilities for the cutting plant area.
- In another slaughterhouse cutting of meat took place in the slaughterhouse area due to lack of space in the cutting room with risk of contamination of the exposed meat.
- In all three slaughterhouses with attached cutting plants there were no or insufficient sterilisers for knives etc. in the cutting plants.
- Procedures for sterilisation of knives and metal gloves in most slaughterhouses and cutting plants visited were not consistently in place and followed by staff. Some of the sterilisation procedures seen were not effective, e.g. not reaching 82° C.
- Shortcomings in operational hygiene practices during work in some of the cutting plants, such as piles of meat kept in containers outside chillers waiting to be cut later. In most cutting plants the mission team was informed that it was a normal practice for staff only to sterilise knives, gloves and aprons by the end of the working day and not during e.g. breaks.
- Good hygiene practices had not yet been audited by the competent authority.

Conclusions

Some deficiencies were noted related to the general hygiene requirements of Annex II to Regulation (EC) No 852/2004. In addition, a number of deficiencies were noted regarding the specific hygiene requirements set out in Regulation (EC) No 853/2004. Moreover, the competent authority had not yet audited good hygiene practices as required by Article 4(3) of Regulation (EC) No 854/2004.

5.3.2 HACCP-based systems

Legal requirements

On the basis of 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 in respect of all products of animal origin falling within the scope of Regulation (EC) No 854/2004 shall include audits of HACCP-based procedures (Article 4 (3)(a) and (5)).

Findings

In the establishments visited, the mission team randomly reviewed parts of the HACCP-based procedures.

The mission team noted that:

- All three establishments visited had HACCP-based procedures in place.
- Some official controls on HACCP-based procedures had been carried out by MAST during inspections and were reported. However, there had not been carried out systematic audits by MAST of HACCP-based procedures in poultry meat establishments.
- In one establishment producing meat products, the HACCP plan contained one critical control point (for the heat treatment of meat products). However, there was no description of the corrective actions in case the minimum temperature for cooking was not reached.
- In one of the establishments visited no records were kept on the on-going verification procedures for monitoring of critical control points.

Conclusions

All establishments visited had HACCP based procedures in place as required by Article 5 of Regulation (EC) No 852/2004. However, there had not been carried out systematic audits by MAST of HACCP-based procedures as required by Article 4(3) and (5) of Regulation (EC) No 854/2004.

5.3.3 Microbiological criteria for foodstuffs

Legal requirements

Details on the microbiological criteria foodstuffs shall comply with are set out in Regulation (EC) No 2073/2005. Article 1 of Regulation (EC) No 2073/2005 specifies that the competent authority shall verify compliance with the rules and criteria laid down in that Regulation.

Findings

MAST has issued guidelines on microbiological criteria laid down in Regulation (EC) No 2073/2005 that were published on MAST's website on 10 April 2012. Food business operators are required to prepare sampling plans according to the guidelines, which then will be reviewed during the next inspection visit by the competent authorities.

A national derogation has been granted to small establishments producing less than three tons per week (reduced sampling frequency) and less than 500 kg per week (no sampling) of minced meat and meat preparation.

The mission team noted that:

- Sampling for microbiological testing as required by Regulation (EC) No 2073/2005 had started in two out of three establishments visited. However, in the two establishments that had started, not all relevant products were covered (e.g. no samples of heat treated ready-to-eat products for *Listeria monocytogenes*). In addition, the frequencies for sampling in Regulation (EC) No 2073/2005 were not always followed, e.g. sampling of meat preparations monthly instead of weekly (for *Salmonella* and *Escherichia coli*).
- The methods used by the laboratories are not those laid down in Regulation (EC) No 2073/2005. However, a number of methods have been compared with the ISO

methods in a study conducted by the Nordic Committee on Food Analysis (NMKL) and some of the NMKL methods used are considered as equivalent by the competent authority (see also section 5.2.4).

- No official samples had at the time of the mission been taken by MAST to verify the food business operators compliance with Regulation (EC) No 2073/2005.

Conclusions

The requirements laid down in Regulation (EC) No 2073/2005 concerning the food business operators' obligations for microbiological testing and the performance of official controls by the competent authority to verify compliance with microbiological criteria were not yet implemented.

5.3.4 Traceability, identification marking and labelling

Legal requirements

Provisions for the identification marking of a product of animal origin are laid down in Article 5 and Annex II, Section I to Regulation (EC) No 853/2004. Verification of compliance with these requirements is foreseen by Article 4(6) of Regulation (EC) No 854/2004. Article 3 of Directive 2000/13/EC sets out the particulars on the labelling of foodstuffs to be delivered as such to the ultimate consumer.

Findings

The mission team noted that:

- Labels and identification marks in establishments visited were correctly applied and their application was under regular official controls.
- In one establishment visited package material with pre-printed identification marks with the old approval number of the establishment was still used due to stocks of old packaging material, even though the set deadline from MAST had passed. Nevertheless, MAST had chosen not to enforce their own set deadline for the use of packaging material with outdated approval numbers (see also section 5.2.6).
- The mission team checked the system for traceability for two samples in one meat establishment visited and found a consistent system in place for tracking back components of the chosen samples.

Conclusions

Identification marking and labelling on products of poultry meat was carried out in line with the requirements of Article 5 and Annex II, Section I of Regulation (EC) No 853/2004 with some minor deficiencies noted.

5.3.5 Official controls at farm level

Legal requirements

According to Article 4 of Regulation (EC) No 852/2004, the food business operators carrying out primary production shall comply with the relevant provisions of Annexes I to this Regulation. According to Article 4(2) of Regulation (EC) No 854/2004 the competent authority shall carry out official controls to verify food business operators compliance with the requirements of Regulation (EC) No 852/2004. These official controls must be carried out in line with Article 3 of Regulation (EC) No 882/2004.

Findings

According to information received in the answer to the pre-mission questionnaire poultry farms in Iceland are registered in the database (see section 5.2.5) as primary producers according to Regulation (EC) No 852/2004. All producers sending poultry to slaughterhouses must be registered and must be under official control independent of the size of the production. New producers have to apply MAST for permission of primary production of poultry meat. The production site is visited by a district veterinarian before production starts. The new production site is registered with an individual number for each producer.

The mission team noted that:

- The broiler farm visited was found to be appropriately registered. The farm maintained a database including records on use of veterinary medicine (no veterinary medicine had been used since 2007), daily mortalities, feed consumption, weight gain etc. Biosecurity conditions on the farm visited including hygiene of personnel were very good and clear written procedures were in place for biosecurity measures.
- Official controls had taken place on the farm in 2011 and 2012. Both inspections were performed by an official veterinarian from the district. In the inspection report from 2012 provisions from Regulation (EC) No 852/2004 regarding animal welfare and food safety measures were included.

Conclusions

Poultry farms are appropriately registered and under official controls. The farm visited complied with the requirements of Regulation (EC) No 852/2004, Annex I.

5.3.6 Food chain information

Legal requirements

According to Article 3 of Regulation (EC) No 853/2004, the food business operator shall comply with the relevant provisions of Annexes II and III to this Regulation. In particular, the food business operator operating slaughterhouses must as appropriate request, receive, check and act upon food chain information in respect of all animals, other than wild game, sent or intended to be sent to the slaughterhouse. According to 5(1) of the Regulation (EC) No 854/2004 the official veterinarian shall carry out inspection tasks in slaughterhouses, also as regards food chain information.

Findings

The mission team noted that:

- In all three poultry slaughterhouses visited examples were seen of documents containing food chain information accompanying animals for slaughter. The documents were based on a template prepared by the competent authority as a farmer's declaration stating that the animals are healthy, have not been treated with veterinary medicine within the last six months, or that the withdrawal period has been kept, and that there are no restrictions put on the farm of dispatch. According to the information received from the slaughterhouses these documents normally follow the consignments of animals.

Conclusions

A system for food chain information for poultry is in place as required by Annex II, Section III of Regulation (EC) No 853/2004.

5.3.7 Ante-mortem and post-mortem inspection

Legal requirements

Article 4 and 5 of Regulation (EC) No 854/2004 requires that the official veterinarian carries out inspection tasks, including ante-mortem inspection of all animals before slaughter and post-mortem inspection in accordance with the general requirements of Chapter II of Section I of Annex I to Regulation (EC) No 854/2004.

Article 5(6)(a) and Annex I, Section III, Chapters III and IV of Regulation (EC) No 854/2004 allows member states to use slaughterhouse staff to assist with official controls in relation to the production of meat from poultry by carrying out certain tasks under the supervision of the official veterinarian, but on the condition that the slaughterhouse staff are qualified and undergo training, act independently from production staff and report any deficiency to the official veterinarian.

Findings

In the answer to the pre-mission questionnaire the competent authority informed that ante-mortem inspection is performed at the slaughterhouse by an official veterinarian less than 24 hours after the arrival of the birds and less than 24 hours before slaughter. The official veterinarian would then check the traceability number of the flocks, animal welfare, health status of the birds, cleanliness of the birds and number of dead birds at arrival.

In addition, in the answer to the pre-mission questionnaire the competent authority informed that post-mortem inspection is performed by an official veterinarian with help from trained slaughterhouse staff and that the official veterinarian would inspect at least 5 % of all birds and all birds condemned by the trained slaughterhouse staff to estimate if the situation is normal.

However, in the slaughterhouses visited the mission team noted that:

- In both districts visited MAST had allowed slaughterhouse staff to carry out ante-mortem inspections in poultry slaughterhouses and, in addition, without supervision of an official veterinarian.
- Incomplete registers for performed ante-mortem controls were noted by the mission team.
- Post-mortem controls were carried out by slaughterhouse staff without supervision from the official veterinarian in all three slaughterhouses visited. The mission team noted deficiencies in the performed post-mortem controls, since not all carcasses were visually inspected by the slaughterhouse staff.
- Incomplete registers for performed post-mortem controls were noted by the mission team.
- In one of the districts visited, one recently employed official veterinarian was in charge of several slaughterhouses slaughtering simultaneously and could therefore not be present at the slaughterhouse during the whole slaughtering process to supervise the slaughterhouse staff performing post-mortem controls.

- MAST could not provide documentation for specific training requirements of performance tests or any other training for qualification for the slaughterhouse staff performing ante-mortem or post-mortem inspections (see also section 5.2.1).

Conclusions

Severe shortcomings were detected in ante-mortem and post-mortem controls of poultry that were carried out by non-trained slaughterhouse staff and, in addition, without supervision from an official veterinarian, which is not in line with Articles 5(1) and Annex I, Section IV, Chapter V and Article 5(6)(a) and Annex I, Section III, Chapters III and IV of Regulation (EC) No 854/2004.

6 Final meeting

A final meeting was held on 8 November 2013 at the MAST office in Reykjavik with representatives from MAST and the Ministry of Industries and Innovation. At the meeting, the mission team presented its main findings and preliminary conclusions of the mission with reference to the relevant EEA legislation. The Icelandic representatives were given the opportunity to comment or ask for clarification during the meeting. The Icelandic representatives did not indicate any disagreement with the main findings and the preliminary conclusions presented findings and undertook to address them.

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.

7 Recommendations

Iceland 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	The competent authority should ensure that staff performing official controls including ante-mortem and post-mortem meat inspections receive training enabling them to undertake their duties competently and independently as required by Article 6 of Regulation (EC) No 882/2004 and Article 5(6)(a) and Annex I, Section III, Chapters III and IV of Regulation (EC) No 854/2004.
2	The competent authority should ensure that poultry meat establishments fully comply with the general requirements set out in Article 4(2) and Annex II of Regulation (EC) No 852/2004 and the specific requirements set out in Article 3 and Annexes II and III of Regulation (EC) No 853/2004.
3	The competent authority should ensure that the official controls are carried out on a risk basis taking into account the reliability of own-checks carried out as required by Article 3(1) of Regulation (EC) No 882/2004.
4	Iceland should arrange for designation of national reference laboratories in line with the requirements of Article 33 of Regulation (EC) No 882/2004.

5	The competent authority should ensure that in case of detected serious non-compliances of feed and food law action must be taken for enforcement in line with the requirements of Article 54 of Regulation (EC) No 882/2004.
6	The competent authority should have procedures in place to ensure that corrective actions are taken and documented as required by of Article 8(3)(b) of Regulation (EC) No 882/2004, when irregularities are detected during official controls.
7	Iceland should prepare a MANCP as required by Article 41 of Regulation (EC) No 882/2004.
8	The competent authority should carry out audits of good hygiene practice and HACCP-based procedures in poultry meat establishments as required by Article 4(3), (4) and (5) of Regulation (EC) No 854/2004 and should ensure the food business operator's compliance with all the requirements for HACCP based procedures as set out in Article 5 of Regulation (EC) No 852/2004.
9	The competent authority should ensure the food business operators' compliance with the microbiological criteria for foodstuffs as laid down in Regulation (EC) No 2073/2005.
10	The competent authority should ensure that ante-mortem inspections for poultry are carried out in line with the requirements of Article 5(1) and Annex I, Section IV, Chapter V of Regulation (EC) No 854/2004.
11	The competent authority should ensure that post-mortem inspections for poultry are carried out in line with the requirements of Article 5(1) and Annex I, Section IV, Chapter V and Article 5(6)(a) and Annex I, Section III, Chapters III and IV of Regulation (EC) No 854/2004.

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

The Authority	EFTA Surveillance Authority
BTSF	Better Training for Safer Food
EEA	European Economic Area
EEA Agreement	Agreement on the European Economic Area
EN/ISO	European standards/International Organization for Standardization
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 and 854/2004.</p>
FVO	Food and Veterinary Office of the European Commission
HACCP	Hazard Analysis and Critical Control Point
MANCP	Multi-Annual National Control Plan
MAST	The Food and Veterinary Authority of Iceland
NMKL	Nordic Committee on Food Analysis
NRL	National reference laboratory
TAIEX	Technical Assistance and Information Exchange

Annex 2 - Relevant legislation


The following legislation has been taken into account in the context of this mission:

- a) 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*;
- b) 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*.
- c) The Act referred to at Point 18 of Chapter XII of Annex II to the EEA Agreement, *Directive 2000/13/EC of the European Parliament and of the Council of 20 March 2000 on the approximation of the laws of the Member States relating to the labelling, presentation and advertising of foodstuffs*, as amended.
- d) 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.
- e) The Act referred to at Point 7.1.9b of Chapter I of Annex I to the EEA Agreement, *Regulation (EC) No 1774/2002 of the European Parliament and of the Council of 3 October 2002 laying down health rules concerning animal by-products not intended for human consumption*, as amended.
- f) 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.
- g) 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.
- h) 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.
- i) 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.

- j) 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.
- k) The Act referred to at Point 6.2.53 of Chapter I of Annex I to the EEA Agreement, *Commission Regulation (EC) No 2074/2005 of 5 December 2005 laying down implementing measures for certain products under Regulation (EC) No 853/2004 of the European Parliament and of the Council and for the organisation of official controls under Regulation (EC) No 854/2004 of the European Parliament and of the Council and Regulation (EC) No 882/2004 of the European Parliament and of the Council, derogating from Regulation (EC) No 852/2004 of the European Parliament and of the Council and amending Regulations (EC) No 853/2004 and (EC) 854/2004*, as amended.
- l) The Act referred to at Point 9.1.2a of Chapter I of Annex I to the EEA Agreement, *Council Regulation (EC) No 1099/2009 of 24 September 2009 on the protection of animals at the time of killing*.
- m) The Act referred to at Point 1.2.146 of Chapter I of Annex I to the EEA Agreement, *Commission Regulation (EC) No 1162/2009 of 30 November 2009 laying down transitional measures for the implementation of Regulations (EC) No 853/2004, (EC) No 854/2004 and (EC) No 882/2004 of the European Parliament and of the Council*.

ESA mission on official control of poultry meat and products				
	Recommendation	Action	Time aspect	Enclosure
1	The competent authority should ensure that staff performing official controls including ante-mortem and post-mortem meat inspections receive training enabling them to undertake their duties competently and independently as required by Article 6 of Regulation (EC) No 882/2004 and Article 5(6)(a) and Annex I, Section III, Chapters III and IV of Regulation (EC) No 854/2004.	MAST will ensure by new routines, that an official vet is present in the poultry slaughterhouses during slaughter, or can be reached and respond within a few minutes. MAST will furthermore set up a training plan for the trained employees of the slaughterhouse that perform post mortem inspection.		
2	The competent authority should ensure that poultry meat establishments fully comply with the general requirements set out in Article 4(2) and Annex II of Regulation (EC) No 852/2004 and the specific requirements set out in Article 3 and Annexes II and III of Regulation (EC) No 853/2004.	MAST will by provide information and training for the official vets in regular meetings, coordination and training courses.		
3	The competent authority should ensure that the official controls are carried out on a risk basis taking into account the reliability of own-checks carried out as required by Article 3(1) of Regulation (EC) No 882/2004.			
4	Iceland should arrange for designation of national reference laboratories in line with the requirements of Article 33 of Regulation (EC) No 882/2004.	Funding for the designation of a NRL in this field is foreseen in 2015.		
5	The competent authority should ensure that in case of detected serious non-compliances of feed and food law action must be taken for enforcement in line with the requirements of Article 54 of	In case of serious non-compliances of the feed and food legislation MAST has implimented a complete enforcement procedure. This procedure is described in		

ESA mission on official control of poultry meat and products				
	Regulation (EC) No 882/2004.	chapter 1.5.2. Follow-up and enforcement measures in the inspection manual 'Skoðunarhandbók - Matvæli úr dýraríkinu' food sector and chapter 1.4.2. Follow-up and enforcement measures in the inspection manual 'Skoðunarhandbók - Fóður' feed sector. If further action is needed, the enforcement procedure is described and documented in MAST quality system VLR-022 Follow-up - enforcement measures.		
6	The competent authority should have procedures in place to ensure that corrective actions are taken and documented as required by of Article 8(3)(b) of Regulation (EC) No 882/2004, when irregularities are detected during official controls.			
7	Iceland should prepare a MANCP as required by Article 41 of Regulation (EC) No 882/2004.			
8	The competent authority should carry out audits of good hygiene practice and HACCP-based procedures in poultry meat establishments as required by Article 4(3), (4) and (5) of Regulation (EC) No 854/2004 and should ensure the food business operator's compliance with all the requirements for HACCP based procedures as set out in Article 5 of Regulation (EC) No 852/2004.	In MAST's Inspection Manual for Food these points are addressed and are subject for inspection in regular visits. Furthermore MAST has an ongoing programme (E – marking) based on this manual where certain inspection points are addressed more thoroughly. The manual is relatively new and is under constant revision.		

ESA mission on official control of poultry meat and products				
9	The competent authority should ensure the food business operators' compliance with the microbiological criteria for foodstuffs as laid down in Regulation (EC) No 2073/2005.	The requirement for sampling to demonstrate compliance to 2073/2005 will be discussed in a meeting 22 January with the slaughterhouse operators and the district veterinarians. An email with a guidance on control of compliance to 2073/2005 has been sent to all district veterinarians to reiterate the importance of checking the compliance to 2073/2005. See attachment. This issue will be followed up in a meeting with the district veterinarians in February.	1.3.2014	 DVOs Letter.doc
10	The competent authority should ensure that ante-mortem inspections for poultry are carried out in line with the requirements of Article 5(1) and Annex I, Section IV, Chapter V of Regulation (EC) No 854/2004.	See point 1 above.		
11	The competent authority should ensure that post-mortem inspections for poultry are carried out in line with the requirements of Article 5(1) and Annex I, Section IV, Chapter V and Article 5(6)(a) and Annex I, Section III, Chapters III and IV of Regulation (EC) No 854/2004.	See point 1 above.		