

Case No: 70785
Event No: 644199

Final report

EFTA Surveillance Authority mission to

Iceland

from 7 to 16 May 2012

regarding the application of EEA legislation

related to the safety of food of animal origin,

in particular meat, milk and their products

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 7 to 16 May 2012 regarding controls on meat, minced meat, meat products, meat preparations, milk and dairy products. This was the first mission carried out 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 on 1 May 2010 and, following a transitional period of 18 months, entered into force in Iceland on 1 November 2011. The objective of the mission was to verify that official controls related to meat, milk 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. The responsible competent authorities are clearly designated and a quality management system is being launched with written work procedures and instructions for staff. A system for risk classification and frequency of official controls is foreseen to be implemented in June 2012. So far no national reference laboratories have been appointed. A multi-annual national control plan is in the process of being prepared starting from 2013 as required by Regulation (EC) No 882/2004.

At the time of the mission 52 meat and milk establishments were listed of which 24 were approved, 19 operated under conditional approval, six had recently applied for approval, and one had stopped. The competent authorities informed that two meat establishments were in the final steps of being closed down. Legal powers are in place to enforce the legislation, however, intermediate measures to prevent these two food business operators from placing the products on the market had not been taken. Procedures for approval for meat and milk establishments are in principle in line with Regulation (EC) No 882/2004 and upgrading plans were in place. However, the approvals seen in the establishments visited did not always cover all facilities and/or activities. A common finding was the use of transport containers as a permanent storage of frozen and fresh meat and products thereof, which were unsuitable and were not part of the approval. Eleven establishments were visited and not all deficiencies found by the mission team had been identified by the competent authorities and were therefore not included in the upgrading plans or reports. Deficiencies were detected in flow of products and staff, incomplete HACCP-procedures, inadequate procedures for cleaning and disinfection, non-appropriate or lack of changing rooms, inadequate lairages, insufficient protection against pests, insufficient maintenance, unclear separation of clean and unclean areas and lack of sterilisators in cutting plants. In particular one meat establishment, that was fully approved, had several of these non-compliances.

Health marking was carried out on carcasses, however, identification marking of meat and dairy products was not yet applied in line with the EEA legislation. Beef labelling as required by Regulation (EC) No 1760/2000 is not yet implemented. Sampling for microbiological testing (Regulation (EC) No 2073/2005) had only started in three out of nine relevant establishments visited. Sampling for Trichinella in both pigs and horses was performed in two out of three relevant slaughterhouses visited. Some minor shortcomings were detected in post-mortem controls and the existing system for food chain information.

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 7 to 16 May 2012. 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 authorities *Matvælastofnun* (MAST) on 7 May 2012 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 regional offices and district offices of the MAST participated during meetings at the district offices and at the visits to the different establishments.

A final meeting was held at the MAST office in Reykjavik on 16 May 2012 where the mission team presented its 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 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; and
- e) *Regulation (EC) No 854/2004 laying down specific rules for the organisation of official controls on products of animal origin intended for human consumption*, as amended and adapted to the EEA Agreement.

The mission covered all stages of meat and milk production and processing, with a particular focus on the following areas:

- a) Official controls related to food business operators' compliance with general and specific rules on the hygiene of food of animal origin and in particular meat, milk and their products;
- b) The implementation of these rules 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 was 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 three district offices of MAST accompanied the mission team during the visits to the establishments and laboratory.
Dairy establishments	2	
Slaughterhouses	4	Some meat establishments with multiple approvals as slaughterhouse, cutting plant and/or meat products/meat preparations plants.
Cutting plants	6	
Meat products and meat preparation plant	5	
Cold stores	3	Two stand-alone cold stores and one attached to slaughterhouse.
Laboratory	1	Private laboratory analysing samples for Trichinella.

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*.

4 Background

4.1 Previous missions

This was the first mission from the Authority to Iceland focusing on meat, minced meat, meat products, meat preparations, milk and dairy products 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.

4.2 Information on production and trade

Information on the quantities of commodities of red meat and milk produced in Iceland (Table 2), milk production (Table 3) as well as trade data (Table 4) were provided by MAST as follows:

Table 2 (production data on red meat, figures from 2011 derive from Statistics Iceland)

Commodity meat (in tons)	2008	2009	2010	2011
Bovines	3,607	3,761	3,895	3,858
Pigs	6,645	6,375	6,158	6,044
Sheep	8,930	8,841	9,166	9,587
Goats	0	0	0	0
Horses	1,005	1,018	799	878

Table 3 (production data on milk)

Milk production (in tons)	2008	2009	2010	2011
Milk collected by dairies	126,052	125,569	123,178	124,800

Table 4 (trade data, i.e. export/trade of red meat and milk or products thereof, only from establishments that were approved for export to the EEA before 1 November 2011)

Commodity (in tons)	2008	2009	2010	2011
Lamb meat	2,117	3,348	4,218	4,581
Horse meat	231	251	164	183
Milk powder	1,632	1,367	1,301	1,608

None of the establishments visited on this mission exported or traded meat, milk or products thereof to other countries within the EEA or to third countries.

5 Findings and conclusions

5.1 Transposition of EEA legislation

Legal requirements

Article 7 of the EEA Agreement requires acts referred to or contained in the Annexes to the Agreement to be made part of the Icelandic internal legal order.

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 implemented to national regulations that have been in force for meat and milk since 1 November 2011. In addition, Commission Regulations (EC) No 2073/2005 on microbiological criteria for foodstuffs, No 2075/2005 on Trichinella and No 1760/2000 on compulsory labelling of beef have been incorporated into the Icelandic legal order and are applicable from 1 November 2011.

According to MAST the Act on Food No 93/1995 provides the legal basis for the competent authorities to enforce this legislation and if establishments do not comply legal powers are in place to close them down or implement other measures (Article 20 and 30 of the Act on Food).

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 National measures and derogations

Legal requirements

According to Article 10 of Regulation (EC) No 853/2004 Member States may, without compromising the achievement of the objectives of Regulation (EC) No 853/2004, adopt national measures adapting the requirements laid down in Annex III. The national measures refer to continued use of traditional methods and regions subject to geographical constraints and are subject to notification to the Authority. Article 7 of Regulation (EC) No 2074/2005 allows Member States to grant establishments manufacturing foods with traditional characteristics derogations from certain requirements set out in Regulation (EC) No 852/2004.

Findings

So far, MAST has not notified any national measures and derogations from the requirements of Regulation (EC) No 853/2004 to the Authority and according to the information received no national measures have been implemented.

Conclusions

No national measures and derogations from the requirements of Regulation (EC) No 853/2004 have been implemented. .

5.3 Implementation of Regulation (EC) No 882/2004

5.3.1 Designation of competent authorities – organisation and responsibilities

Legal requirements

Article 4(1) of Regulation (EC) No 882/2004 requires Member States to designate the competent authorities responsible for the official controls set out in the Regulation.

Findings

MAST and the Municipal Environmental and Public Health Offices (LCAs) have been designated as competent authorities for food safety controls as provided for in Article 4 of Regulation (EC) No 882/2004. The official controls for which MAST is directly responsible are listed in Article 6 of the Act on Food No 93/1995. According to Article 22 of the Act on Food, LCAs, under the supervision of MAST, are responsible for all other official controls, including general retail market supervision of food and supervision of meat and fish processing in retail outlets. MAST carries out official controls of: animal health, animal welfare, food of animal origin other than retail, feed, and import /export of food of animal and non-animal origin. LCAs conduct official controls at retail level (food of animal origin) and official controls of food of non-animal origin. MAST may allocate some of its responsibilities to LCAs under contract. Contracts are in place with four LCAs, largely for official controls in small establishments with limited production. In those cases LCAs use MAST procedures.

Conclusions

Competent Authorities responsible for official controls in the milk and meat sector have been designated as required by Article 4(1) of Regulation (EC) No 882/2004.

5.3.2 *Coordination and cooperation between and within competent authorities*

Legal requirements

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

Findings

According to information provided by representatives of MAST, MAST and the LCAs have established several mechanisms for cooperation and coordination:

- LCAs are supervised by MAST although it may not give them direct instructions or intervene in their day-to-day operation. However, according to the agreement between MAST and the four LCAs carrying out controls on food of animal origin, LCAs are obliged to follow guidelines issued by MAST for specific areas, they have to follow the same procedures as the district offices of MAST and to report annually on their controls. MAST can intervene in case of threat to public health;
- a special Food Safety Group chaired by MAST meets 5-6 times annually. Representatives from the LCAs are in the group. The group function is to: exchange information; harmonize the work of the LCAs; plan coordinated monitoring/inspection projects on certain aspects of food safety (3-5 annually) and carry out other activities;
- biannual meetings between MAST and the LCAs - in the spring with the directors of the ten LCAs and in the autumn with all LCA inspectors;
- visits of the chairman of the Food Safety Group to LCAs (in 2011 six LCAs visited) in order to improve understanding and harmonization between MAST and the LCAs;
- joint inspections by MAST and LCAs. According to the contract MAST has made with four of the LCAs a joint inspection shall be carried out on a yearly basis to coordinate.

For co-operation within MAST:

- Monthly meetings are organised by the central office with the district offices;
- central level joins inspections at the district level regularly.

MAST is establishing a quality system based on ISO standard 9001:2002 and is considering having it accredited. According to representatives of MAST the system will be fully implemented before the end of 2012. All working procedures are published within the quality system. A quality manual is according to representatives of MAST in the final stages of preparation and will be published on the website of MAST before the end of 2012. A special database for official controls has been developed (Ís-Leyfur). The database is accessible to the staff of MAST by password access control through the internet. The database is linked to the list of approved establishments on MAST's website in real time.

MAST has developed various guidelines and procedures for official controls. The mission team noted that the procedures issued were followed by the district offices visited.

Conclusions

Several mechanisms have been established for cooperation and coordination of official controls both between MAST and the LCAs and within MAST as required by Article 4(3) and (5) of Regulation (EC) No 882/2004.

5.3.3 *Powers and resources for performance of official controls*

Legal requirements

Article 4(2)(e) and (g) of Regulation (EC) No 882/2004 require that the necessary legal powers to carry out official controls are in place and that there is an obligation on food business operators to undergo inspections by the competent authorities. Article 8(2) of the above-mentioned Regulation requires that competent authorities have the necessary powers to access food business operators' premises and documentation. Article 4(2)(b) and (c) of the Regulation require the competent authorities to ensure that they have access to a sufficient number of suitably qualified and experienced staff and that staff performing controls are free of any conflict of interest.

Findings

Representatives of MAST informed the mission team that MAST has all necessary powers to carry out official controls and that MAST can access any food business operator at any time.

According to Article 30 of the Act on Food No 93/1995 the competent authorities and their staff have full access to all premises and documentation of food business operator. The Foodstuffs Act also requires the food business operators to undergo inspection and assist the competent authorities in the process (Article 24 (1)).

The six district veterinary officers have official tasks only. The Minister of Fisheries and Agriculture can derogate from this and permit the six district veterinary officers to provide services to animal owners in case it is not possible to get a private veterinary practitioner to the most remote areas.

Sixteen official veterinarians including the six district veterinary officers are working in the districts. In one of the districts visited MAST had contracted private veterinary practitioners to carry out ante- and post mortem inspections in slaughterhouses under the supervision of the official veterinarians. Representatives of MAST informed the mission team that contracts with the private veterinary practitioners were under revision to be finalised before end of June 2012 and that the use of private veterinary practitioners in meat control in general were being re-evaluated.

Conclusions

The competent authorities have the legal powers and resources to carry out official controls as required by Articles 4 and 8 of Regulation (EC) No 882/2004.

5.3.4 *Staff qualifications and training*

Legal requirements

Article 6 of Regulation (EC) No 882/2004 requires competent authorities to ensure that staff receive appropriate training, and are kept up-to-date in their competencies.

Article 5.7 and Annex I, Section III, Chapter IV of Regulation (EC) No 854/2004 give detailed requirements for training of staff carrying out official controls.

Findings

Staff at district offices (local level) involved in the official control of the meat and milk sectors are veterinarians (Official and District Veterinary Officers). At the head office there is one veterinarian responsible for harmonization of official controls on meat and dairy and a food scientist who carries out inspections in meat and milk processing plants. The official veterinarians and the two staff members at the central level are responsible for all official control visits and follow-up within the scope of this mission.

MAST plans to develop a national training programme in 2012. However, district veterinary officers/LCAs undergo a compulsory initial training and ad-hoc on-going training. The central management of MAST has requested all central and district level managers of MAST to prepare plans and requirements for training and continuing education of their staff. MAST's Human Resource and Quality Managers are responsible for the follow-up of this action.

The organisation and the scope of initial training of new official veterinarians were at the time of the mission still being drafted. A representative of MAST informed the mission team that all newly recruited veterinarians are working under the supervision of a senior official veterinarian, but no time frame is yet given for this supervision.

Representatives of MAST further informed the mission team that there is not yet a system in place for assessment of training needs and the effectiveness of training and that not all previously contracted private veterinary practitioners did participate in the training offered to them. MAST is therefore considering terminating the use of their services in some districts.

Training is organised through meetings and seminars at central level. In one of the districts visited staff had participated in a seminar/meeting on slaughterhouse controls and meat hygiene and had participated in three Technical Assistance and Information Exchange (TAIEX) training sessions on microbiological testing, zoonoses and auditing buildings and equipment. In addition, they had participated in a five day study tour to Denmark on official controls and meat hygiene in establishments.

Furthermore staff had participated in four Better Training Safer Food (BTSF) sessions on auditing Hazard Analysis and Critical Control Points (HACCP) systems, microbiology, animal welfare during transport and official controls and meat hygiene.

Representatives of the central office of MAST informed the mission team that further TAIEX training is foreseen in 2012 on:

- HACCP, 23rd – 25th of May;
- internal Audits, September (dates yet to be confirmed, collaborating expert confirmed);
- audits of establishments, one training workshop in October 2012 and one in January/February 2013 (dates yet to be confirmed); and
- labelling and additives.

In another district the district veterinary officer had participated in a BTSF training on meat hygiene and on milk hygiene in the last two months.

Conclusions

Training has been provided to the staff of MAST. However, training as required by Article 5(7) and Annex I, Section III, Chapter IV of Regulation (EC) No 854/2004 is not yet formalised.

5.3.5 *Registration/approval of food business operators*

Legal requirements

Article 31(1) and (2) of Regulation (EC) No 882/2004 requires Member States to establish procedures for the registration/approval of food and feed business operators and that a list of food and feed business operators which have been registered should be drawn up by the competent authorities. Article 31(2) of the same Regulation sets out the requirements for the procedures to follow for competent authorities and for food and feed business operators when applying for approval and for granting conditional approvals (including deadlines to be kept), for reviewing compliance with conditions of registration and for the withdrawal of approvals. The competent authority shall keep the approval of establishments under review when carrying out official controls. In addition, Article 4 of Regulation (EC) No 853/2004 lays down food business operators' obligations in relation to registration and approval of establishments.

Findings

According to information provided by representatives of MAST, 24 food business operators have an approval and 19 have a conditional approval. In addition six new food business operators are in the application phase and two are in the final steps of being closed down after not fulfilling the conditions given for the conditional approval within the six months' time limit for conditional approval (both these establishments were not on the MAST list of approved or conditionally approved establishments at the time of the mission).

A working procedure on registration/approval of establishments is in force and is published in the quality 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.

MAST can grant a conditional approval following an inspection if the food business operator can demonstrate that within a three-month period the food business operator can establish:

- Correct flow of products and personnel;
- buildings and equipment in line with legal requirements;
- HACCP based system in accordance with requirements and
- a plan for corrective actions/upgrading plan.

According to the procedures, the food business operator is obliged to send an upgrading plan to MAST addressing the conditions for the approval indicating deadlines for corrective actions.

MAST can prolong the conditional approval once for three months after a new inspection. The mission team noted that:

- In most of the establishments visited the deadline of three months had been respected and a new inspection was carried out either prolonging the conditional approval or granting a permanent approval for 12 years according to MAST procedures;
- there was not always a clear link between the upgrading plan of the establishments and the conditional approval and the inspection reports did not clearly indicate whether shortcomings in the first visit had been controlled in the follow-up visit.

In some of the establishments visited an upgrading plan had been prepared based on shortcomings identified during MAST inspections and had been discussed with MAST officials. However the mission team noted that some non-compliances observed by the mission team on-the-spot were not mentioned in neither the inspection reports nor the upgrading plans such as:

- Some shortcomings in the layout or facilities such as a door to the open directly from a processing area;
- maintenance problems and insufficient maintenance plan in some of the establishments visited;
- inadequate facilities for storage of animal by-products;
- some of the HACCP plans in the approved food business operators were not fully operational yet.

One establishment visited was not approved for all the activities carried out (this was corrected immediately by the district veterinary officer that issued a revised approval). A new establishment not yet approved was producing and placing meat products on the market. The district veterinary officer informed the mission team that the establishment had been inspected very recently and that a conditional approval was being issued.

According to information received from MAST at the initial meeting the two establishments that were closing down was due to inappropriate housing. These two establishments were not visited by the mission team. They did not have approvals or figured on the MAST list. Nevertheless, the mission team noted that both establishments were still placing meat products on the market (e.g. evidence of their meat products was found in other meat establishments and the continuing activities were also confirmed by MAST at district level). At the final meeting representatives of MAST confirmed that in both establishments legal procedures had been started by MAST to close them down, however, no intermediate measures were foreseen to prevent these establishments from placing their meat products on the market.

In addition, the mission team observed that:

- It was not always apparent from the approval what facilities were approved. One establishment was approved for treating hides. However, the salting of hides was carried out in another establishment next door, not approved for handling hides;
- in some of the establishments visited freezer containers for transport were used as freezer stores for products for human consumption or for animal by-products. The containers were not included in the blueprint of the facilities linked to the approvals and it was not always clear whether the approval included the containers;
- none of the containers were easy to clean and maintain and were when inspected by the mission team not clean.

Conclusions

The procedures for approval are in line with Article 31 of Regulation (EC) No 882/2004. However, the approvals seen did not always cover all facilities or activities.

Food business operators were producing and placing meat products on the market without an approval which is not in line with Article 4 of Regulation (EC) No 853/2004.

5.3.6 *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 is working according to a quality management system and is considering having it accredited according to ISO 9001:2002. It is in the final stages of implementing a risk classification system for official controls in food business operators. The system is based on a Swedish model. According to information provided by representatives of MAST during the mission the risk classification system will be implemented as of June 2012. Guidelines have been made for the risk classification model in each sector, including LCAs. At the final meeting a representative of MAST informed the mission team that an agreement had been reached with the LCAs that they will take the risk classification system into use at the latest before January 2014.

The risk classification system has been used to categorise establishments by risk and calculate control frequencies for all sectors. The interface between the risk model and a new database for official controls (Ís-leyfur) is also under development.

Representatives of MAST informed that normally controls are carried out without prior warning as required in the legislation incorporating Regulation (EC) No 882/2004.

Conclusions

A system for risk classification and frequency of official controls in line with Article 3(1) of Regulation (EC) No 882/2004 is foreseen to be implemented in June 2012.

5.3.7 *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

MAST representatives informed the mission team that no NRLs have been designated despite the 1 November 2011 deadline. MAST has written to Ministry of Fisheries and Agriculture with a list of Icelandic laboratories which have the capacity to become NRLs. However, the list has not yet been approved by the Ministry.

According to information provided by representatives of MAST to the mission team, MAST designates laboratories to carry out analysis of samples taken during official controls. To be designated, a laboratory must have accredited testing methods. If no laboratory has accreditation for a testing method, a foreign accredited laboratory is chosen, having regard to practical experience and proximity. More than half of animal health samples and some food samples are analysed by foreign laboratories.

Four laboratories have been designated to handle all official samples taken in Iceland.

All four are accredited, but not for all of the analyses they perform. These laboratories are accredited according to the international standard EN ISO/IEC 17025 on the general requirements for the competence of testing and calibration laboratories and Icelandic Regulation No 351/1993 on the operation of accredited testing laboratories.

The LCAs use both official and private laboratories accredited for analysis of samples of food and water for human consumption. The LCAs have their own contract with the laboratories. Some samples are sent for analysis to laboratories in other Member States of the EEA.

The mission team noted that not all methods used for analysis of microbiological criteria assessed during the mission were accredited.

Conclusions

The competent authorities have not designated NRLs which is not in compliance with Article 33 of Regulation (EC) No 882/2004.

MAST has designated four laboratories to carry out analysis of samples taken during official controls in accordance with the requirements of Article 12 of the Regulation. However, not all methods used were accredited.

5.3.8 *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. Article 10 of Regulation (EC) No 882/2004 specifies the control activities, methods and techniques that should be deployed.

Findings

According to information provided by representatives of MAST during the mission, MAST's quality management system (see also chapter 5.3.6.) will be fully implemented before the end of 2012 and will be published on the website of MAST. All written working procedures and working instructions are published within this system. A manual on official controls has been published and is the basis for the controls carried out by staff of MAST.

The mission team noted that in addition to the manual of official controls there are working procedures or working instructions and guidelines for inter alia:

- Work procedure for approval and registration of food business operators;
- inspection handbook for products of animal origin;
- work procedure for official controls;
- work description for official controls;
- template for non-compliance reports;
- handbook for official controls in slaughterhouses;
- checklists for daily, weekly and monthly inspections in slaughterhouses;
- guidelines for sampling for *Trichinella*; and
- guidelines on microbiological criteria issued in April 2012.

All control activities are registered in a database for official controls (Ís-Leyfur). A checklist for inspections and audits is available for the control staff of MAST. The mission team noted that inspection reports were available in all the establishments visited by the mission team.

In general the mission team noted that MAST's inspection handbook for products of animal origin covers many of the points mentioned in point 2 of Article 10 of Regulation (EC) No 882/2004, i.e. examination of control systems of the food business operator, inspection of food business operators, assessment of good manufacturing practices (GMPs) and HACCP based systems, interviews with food business operators, examination of records etc. The mission team noted that although the controls on the hygiene conditions in the establishments were included in the checklists some deficiencies were seen in the operational hygiene in all but one of the cutting plants visited.

For all the food business operators visited by the mission team, evidence of official controls was available in the form of inspection reports. All the visited establishments had been inspected twice since 1 November 2011.

A special checklist has been developed for the official controls at food business operators. The mission team noted that the checklist was used in all places visited by the mission team, except one cold store under the official controls of an LCA. The checklist is available for the district offices electronically.

Conclusions

MAST is working according to a quality management system with written work procedures, work instructions and guidelines in line with the requirements of Article 8 of Regulation (EC) No 882/2004. The system is however, not yet fully implemented.

5.3.9 *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 inspection handbook of MAST, non-compliances noted during inspections in food business operators are classified in three categories. The mildest is a reminder (“ábending”), which can be corrected immediately, the more serious is a non-compliance, (“frávik”) which is required to be corrected before next scheduled inspection and the third one is a serious non-compliance (“alvarlegt frávik”) where a short deadline is given for corrective actions.

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 observed in the food business operators visited during the mission that 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.

The work procedure for enforcement described above was at the time of the mission being drafted. The mission team did not receive evidence of use of sanctions during the mission.

The competent authorities informed that legal procedures had recently been started to close down two meat establishments, however, other intermediate measures e.g. imposition of sanitation measures, restriction or prohibition of the placing on the market of products, suspension of operation or closure of part of the business etc. to prevent these establishments from placing their products on the market had not been taken.

Conclusions

Procedures for enforcement are in place for inspections. However, measures as set out in Article 54(2) to prevent establishments that are not fulfilling the requirements from placing products of animal origin on the market and procedures for enforcement in case of serious or repeated non-compliances are not effectively implemented which is not in line with Article 54 of Regulation (EC) No 882/2004.

5.3.10 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.

Findings

As verification tools the mission team observed that mechanisms are in place such as:

- Joint inspections from central/district level once a year to slaughterhouses; and
- inspections and audits were in one of the districts visited carried out by two inspectors and the district veterinary officer joined the inspectors occasionally.

Audits are foreseen within the quality manual of MAST and a special multi-annual audit plan has been developed. Controls within the scope of this mission are according to the audit plan foreseen to be audited second half of 2012 and beginning of 2013.

Conclusions

Mechanisms are in place for evaluating official controls. Audits within the scope of this mission are on the special internal audit plan for 2012.

5.3.11 Multi-annual national control plan

Legal requirements

Article 41 of Regulation (EC) No 882/2004 requires that each Member State prepares a single integrated Multi-annual Control Plan (MANCP).

Findings

MAST is working on a three-year Multi-annual National Control Plan (MANCP) which is expected to be completed by end of 2012 and is scheduled to take effect as of 2013. The MANCP being developed will cover the years 2013-2016.

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. MAST has established a collaboration with Finland regarding how to formulate and implement the MANCP and a seminar at Evira in Finland is planned in the first half of 2012 (dates were at the time of the mission not yet confirmed). A representative of MAST declared at the final meeting of the mission that the MANCP was not mere information on the structure of the competent authorities but a detailed description of all controls to be carried out.

According to information provided by MAST a rigorous revision process is envisioned for the first cycle of the MANCP to improve and incorporate new developments into the MANCP.

Conclusions

A three year MANCP is being developed for 2013 to 2016 in line with Article 41 of Regulation (EC) No 882/2004.

5.4 Food business operators' obligations and official controls

5.4.1 General hygiene requirements

Legal requirements

Article 4(2) of Regulation (EC) No 852/2004 establishes that food business operators carrying out any stage of production, processing and distribution of food after the stage of primary production/associated operations shall comply with general hygiene requirements as set out in Annex II to Regulation (EC) No 852/2004. These provisions relate to cleaning and maintenance, layout, design, construction, siting and size of food premises. Article 4(4) of Regulation (EC) No 854/2004 specifies that the competent authority shall carry out official controls in respect of products of animal origin to verify food business operators' compliance with these requirements.

Findings

Five out of eleven of the establishments visited were operating on conditional approvals and still in an upgrading process at the time of the mission. The six establishments with a final approval visited were found to be mainly compliant with the general hygiene requirements with the exception of one slaughterhouse. 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 upgrading plans for the establishments:

- A conditionally approved dairy plant was receiving raw milk through a door to the outside opening up directly to the production area. In the production area there was not proper drainage for water resulting in flooding of floors in the production area. Old equipment no longer in use was stored in production rooms. In the dispatch area the gate was not pest proof;
- in a conditionally approved slaughterhouse with an attached facility for producing smoked meat and minced meat, deficiencies were noted in relation to flow of staff and their changing facilities. Lack of maintenance was noted of walls, floors and ceiling in both the production room and the attached chiller. In the chiller condensation problems was seen with water dripping on to exposed carcasses. In

addition, transport containers were used as a permanent storage of frozen meat and products, which were unsuitable and were not part of the approval. Animal by-products were stored in an open container (that was not labelled) outside of the slaughterhouse;

- in a conditionally approved meat processing plant a dish washer facility was placed next to a kitchen preparing ready-to-eat heat treated dishes without ensuring sufficient separation risking cross contamination with splashing of water on from the hose used to the heat treated products;
- in a conditionally approved slaughterhouse pig heads were touching the floors. Condensation problems were noted in the chillers with water dripping directly on to carcasses. A container that was not appropriate due to lack of cleaning and difficult to maintain in a proper standard placed outside of the slaughterhouse was used for storage of frozen meat; and
- in a finally approved slaughterhouse with an attached cutting plant, deficiencies were noted in relation to flow of products as well of staff and, in addition, their changing facilities were inappropriate. Maintenance and hygiene problems were noted in a freezer and a dispatch gate for animal by-products was not pest proof.

Conclusions

Several deficiencies were noted related to the general hygiene requirements of Annex II to Regulation (EC) No 852/2004.

5.4.2 *Specific requirements*

Legal requirements

Article 3 of Regulation (EC) No 853/2004 sets out that food business operators shall comply with the specific requirements of Annexes II and III to that regulation. Article 4(3) of Regulation (EC) No 852/2004 states that food business operators shall adopt specific hygiene measures regarding compliance with microbiological criteria for foodstuffs, compliance with temperature control requirements and sampling and analyses. Article 4(4) of Regulation (EC) No 854/2004 specifies that the competent authorities shall carry out official controls in respect of products of animal origin to verify food business operators' compliance with these requirements.

Findings

The following deficiencies were identified by the mission team during the visits which had not previously been noted by MAST (or had not been enforced).

- In a finally approved slaughterhouse with attached cutting plant there were no sterilisers in the cutting plant;
- lairages in two finally approved slaughterhouses were not hygienic (broken sides of walls of pens and lack of cleaning) with insufficient space and they were not properly equipped for watering the animals (deficiencies noted in water cups). The layout and size of the lairages did not ensure that the welfare of the animals was respected. In both slaughterhouses the layout did not facilitate ante-mortem inspection. There was not separate drainage of water from the sick pens. In addition, there were no changing facilities for staff working in the lairages;
- in several meat establishments visited there were not sufficient facilities in place for cleaning and sterilisation of the saws used for splitting and cutting up carcasses;
- procedures for sterilisation of knives and metal gloves in most slaughterhouses and cutting plants visited were not consistently in place and followed by staff in most of the meat establishments visited. Some of the sterilisation procedures seen were

not effective, e.g. not reaching 82° C or not allowing complete sterilisation of knives because water was not high enough in the sterilisers;

- shortcomings in operational hygiene practices during work in some of the cutting plants, such as meat kept on tables during working breaks, personal equipment stored on cutting tables during breaks, knives and equipment kept in inappropriate places. 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; and
- good hygiene practices had not yet been audited by the competent authorities.

Conclusions

A number of deficiencies were noted regarding the specific hygiene requirements set out in Regulation (EC) No 853/2004. In addition, the competent authorities have not yet audited good hygiene practices as required by Article 4(4) of Regulation (EC) No 854/2004.

5.4.3 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(5)).

Findings

In the establishments visited, official controls on HACCP-based procedures had been carried out by MAST in the context of the approval procedure.

All establishments visited had HACCP based procedures in place. In the establishments where the mission team randomly reviewed parts of the HACCP-based procedures, the following was noted:

- In five establishments visited the competent authorities had requested corrective actions to improve the procedures in place;
- some irregularities concerning the own-checks of the food business operators had not been identified by the competent authorities. For instance, there were no procedures in place in case of cutting through abscesses;
- in two establishments (of which one was finally approved) producing meat products, their HACCP 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 and in one of the establishments the critical limit was not set; and
- one slaughterhouse had been finally approved even though the HACCP plan and associated handbook had not yet been finalised.

Conclusions

All establishments visited had HACCP based procedures in place, however, in some cases seen these were incomplete, and therefore not in line with Article 5 of Regulation (EC) No

852/2004. The official controls on HACCP-based procedures carried out did not identify all the deficiencies and some establishments had received final approvals despite having incomplete HACCP based procedures.

5.4.4 *Microbiological testing*

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 was published on MAST's website 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.

Official controls by the competent authorities on the implementation of microbiological testing according to the guidelines are planned to start in the last quarter of 2012, as well as official sampling.

In the establishments visited the mission team noticed the following:

- Some establishments had a sampling plan in place based on previous national legislation. In most cases some tests had been performed for the determination and verification of the shelf life of products;
- sampling of pig carcasses for Salmonella is not performed by the food business operators, as the competent authorities carry out official sampling of carcasses, according to a plan by MAST;
- sampling for microbiological testing as required by Regulation (EC) No 2073/2005 had only started in three out of nine relevant establishments visited. Trend analysis was carried out in two establishments; and
- 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 authorities.

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 authorities to verify compliance with microbiological criteria are not yet implemented.

5.4.5 *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.

Regulations (EC) No 1760/2000 set out specific labelling requirements for beef meat.

Findings

According to information received from MAST all establishments producing red meat and milk products had been allowed to use up their stocks of old packaging materials without the required identification marking as set out in Regulation (EC) No 853/2004.

- The mission team found several examples of unidentifiable products in the establishments visited;
- many examples were seen where packed products of meat and milk had not been correctly applied with identification marking including approval number of establishment because old pre-printed packaging materials had been used; and
- the mission team confirmed in the visited meat establishments that the compulsory labelling of beef has not yet been implemented in Iceland and that at the time of the mission commodities with beef were not yet labelled correctly including country of origin.

Conclusions

Identification marking and labelling on meat and milk products was not carried out in line with the requirements of Article 5 and Annex II, Section I of Regulation (EC) No 853/2004. The compulsory labelling of beef as required by Regulation (EC) No 1760/2000 is not yet implemented in Iceland.

5.4.6 *Traceability*

Legal requirements

According to Article 18 of Regulation (EC) No 178/2002 the traceability of food and food producing animals and any other substance intended to be incorporated into a food shall be established at all stages of production, processing and distribution. The food business operators shall have in place systems and procedures to identify from whom they have been supplied and the other businesses to which their products have been supplied.

Article 4(6) of Regulation (EC) No 854/2004 requires that verification of compliance with traceability requirements takes place in all approved establishments.

Findings

- The mission team checked the system for traceability in one meat establishment visited and found a consistent system of registration of incoming and outgoing materials; and
- in both cold stores visited electronic traceability systems including barcodes were in place ensuring full traceability of incoming goods including information of shelf-life of stored products.

In the draft report template for inspections to be carried out by the competent authorities traceability was mentioned as a relevant parameter to check and several examples were seen of official controls carried out on traceability.

Conclusions

In establishments visited sufficient traceability systems were in place in line with Article 18 of Regulation (EC) No 178/2002 and official controls were carried out to ensure it in line with Article 4(6) of Regulation (EC) No 854/2004.

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

5.5.1 Food chain information

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, Section III of Annex II of this Regulation states that 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

- In all four slaughterhouses visited examples were seen of documents containing food chain information accompanying animals for slaughter. The documents are based on a template prepared by the competent authorities and is a farmer declaration where it is stated that the animals are healthy, have not been treated with veterinary medicine within last 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;
- the document does not contain the name and address of the private veterinarian that is normally attending the animals and the documents do not arrive to the slaughterhouses 24 hours in advance of the slaughtering (and deviations from the time limit have not been allowed by the competent authorities).

Conclusions

A system for food chain information is in place in Iceland, but it does not fulfil all requirements of Annex II, Section III of Regulation (EC) No 853/2004.

5.5.2 Ante-mortem inspection

Legal requirements

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

Findings

- Ante-mortem controls were carried out adequately in all slaughterhouses visited and registers for performed controls were in place. As mentioned in section 5.4.2.

in two of the finally approved slaughterhouses the facilities for carrying out ante-mortem inspections were not well designed.

Conclusions

The ante-mortem inspections and their documentation were in compliance with most of the requirements of Regulation (EC) No 854/2004.

5.5.3 Post-mortem inspection

Legal requirements

Article 5(1) of Regulation (EC) No 854/2004 requires that the official veterinarian carries out inspection tasks, including post-mortem inspection in accordance with the general requirements of Chapter II, Section I, of Annex I to Regulation (EC) No 854/2004 and with the specific requirements of Section IV of Annex I to the same Regulation. Details on the requirements for *Trichinella* testing are set out in Regulation (EC) No 2075/2005.

Findings

The post-mortem inspections were carried out and documented in registers in all slaughterhouses visited. However, the following deficiencies in the inspection procedures were noted by the mission team:

- In two slaughterhouses slaughtering bovines, the post-mortem inspection carried out of the intestines was insufficient (in addition, in one of them the slaughter line was not well designed and made it impossible to carry this inspection out properly;
- in one slaughterhouse slaughtering pigs there was no post-mortem inspection of intestines carried out (according to the competent authorities due to lack of staff on that particular day); and
- in one slaughterhouse slaughtering cattle and horses there was no post-mortem inspection carried out of the heads.

As regards *Trichinella* examinations since January 2012 slaughterhouses must take samples from horses and pigs. The mission team confirmed that so far samples had been taken in two out of three slaughterhouses visited slaughtering pigs or horses. The slaughterhouse that had not taken samples yet explained that they were waiting for instructions from the laboratory.

Samples for *Trichinella* testing must be sent to one of two private laboratories in Iceland. One of these two laboratories was visited by the mission team and it was verified that a testing method was used in line with Regulation (EC) No 2075/2005 (the reference method) and that the correct equipment was available.

Conclusions

The post-mortem inspections and their documentation were in compliance with most of the requirements of Regulation (EC) No 854/2004. Not all slaughterhouses sampled pigs and horses for *Trichinella* examination as required by Regulation (EC) No 2075/2005.

5.5.4 Health marking

Legal requirements

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

Findings

According to information received from MAST, all approved and conditionally approved slaughterhouses and game handling establishments were obliged to use the oval health mark since 1 November 2011.

- The mission team confirmed at the visits in establishments that carcasses had been correctly health marked with one exception where carcasses had been labelled with old labels with outdated approval numbers.

Conclusions

Health marks seen were generally applied correctly to carcasses as required by Article 5(2) and Section I, Chapter III of Annex I of Regulation (EC) No 854/2004.

5.5.5 Criteria for raw milk

Legal requirements

Article 8 of Regulation (EC) No 854/2004 states that Member States shall ensure that official controls with respect to raw milk and dairy products take place in accordance with Annex IV to Regulation (EC) 854/2004 and that the competent authority is to monitor the checks carried out for plate count, somatic cell count and residues of antibiotic substances in accordance with Annex III, Section IX, Chapter I, Part III to Regulation (EC) No 853/2004.

Findings

- In (the) two dairy establishments visited the results of the raw milk testing were not available because both dairy plants received milk that was tested at the suppliers (one dairy farm and one dairy plant only supplying pasteurised milk). Nevertheless, according to information received from the food business operators as well as the competent authorities testing was done and results had been in line with EU requirements.

Conclusions

The mission team had limited possibility to assess the situation regarding raw milk testing, however, no deficiencies were detected.

6 Final meeting

A final meeting was held on 16 May 2012 at the MAST office in Reykjavik with representatives from MAST, the local authorities and the Ministry of Agriculture and Fisheries. 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.

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 of the establishments receive training enabling them to undertake their duties competently as required by Article 6 of Regulation (EC) No 882/2004 and Article 5(7) and Annex I, Section III, Chapter IV of Regulation (EC) No 854/2004.
2	The competent authority should ensure that approvals are only granted to establishments that fulfil all requirements of feed and food law as set out in Regulations (EC) No 852/2004 and No 853/2004 as required by Article 31 (2)(c) and (d) of Regulation (EC) No 882/2004 and, in addition, should ensure that meat and milk 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 food business operators only place products of animal origin on the market, if the animal products are prepared and handled exclusively in establishments approved according to Article 4 of Regulation (EC) No 853/2004.
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 laboratory methods used for analysis of microbiological criteria are accredited and fulfil all requirements of Article 12(3) and (3) of Regulation (EC) No 882/2004.
6	The competent authority should continue the implementation of harmonised procedures for performance and reporting of official controls and to ensure that corrective actions are taken when needed as required by Articles 8 and 9 of Regulation (EC) No 882/2004.
7	The competent authority should ensure that in case of serious or repeated 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.
8	The competent authority should carry out audits of good hygiene practice and HACCP-based procedures in meat and milk establishments as required by Article 4(3) 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 food business operators comply with the provisions for the identification marking of meat and milk products as set out in Article 5(1)(b) and Annex II, Section I to Regulation (EC) No 853/2004.

11	The competent authority should ensure that food business operators comply with the provisions for compulsory labelling of beef as required by Regulation (EC) No 1760/2000.
12	The competent authority should ensure that food business operators operating slaughterhouses comply with all the provisions for food chain information as required by Article 3 and Annex II, Section III Regulation (EC) No 853/2004.
13	The competent authority should ensure that post-mortem inspections for pigs and cattle are carried out in line with requirements of Article 5(1) and Annex I, Section IV of Regulation (EC) No 854/2004.
14	The competent authority should ensure that samples are taken from all pigs and horses for examination for Trichinella as required by Regulation (EC) No 2075/2005.

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

The Authority	EFTA Surveillance Authority
BTSF	Better Training for Safer Food
CCP	Critical Control Point
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
GMP	Good Manufacturing Practice
HACCP	Hazard Analysis and Critical Control Point
LCA	Municipal Environmental and Public Health Offices
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 - Other relevant legislation


The main EEA Acts regarding meat and milk products and relevant for this mission are:


- a) The Act referred to at Point 1.1.1 of Chapter I of Annex I to the EEA Agreement, *Council Directive 89/662/EEC of 11 December 1989 concerning veterinary checks in intra-Community trade with a view to the completion of the internal market*, as amended and as adapted to the EEA Agreement by the sectoral adaptations referred to in Annex I to that Agreement.
- b) The Act referred to at Point 1.1.7c of Chapter I of Annex I to the EEA Agreement *Regulation (EC) No 1760/2000 of the European Parliament and of the Council of 17 July 2000 establishing a system for the identification and registration of bovine animals and regarding the labelling of beef and beef products and repealing Council Regulation (EC) No 820/97*, as amended.
- c) The Act referred to at Point 1.1.9 of Chapter I of Annex I to the EEA Agreement, *Council Directive 96/93/EC of 17 December 1996 on the certification of animals and animal products*.
- d) 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.
- e) 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.
- f) 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*;
- g) 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.
- h) 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.
- i) 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.

- j) 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.*
- k) The Act referred to at Point 6.2.54 of Chapter I of Annex I to the EEA Agreement, *Commission Regulation (EC) No 2075/2005 of 5 December 2005 laying down specific rules on official controls for Trichinella in meat, as amended.*
- l) The Act referred to at Point 6.2.55 of Chapter I of Annex I to the EEA Agreement, *Commission Regulation (EC) No 2076/2005 of 5 December 2005 laying down transitional arrangements for the implementation of Regulations (EC) No 853/2004, (EC) No 854/2004 and (EC) No 882/2004 of the European Parliament and of the Council and amending Regulations (EC) No 853/2004 and (EC) 854/2004, as amended.*
- m) 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.*
- n) 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.*
- o) 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.*
- p) The Act referred to at Point 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*

Annex 3 – Reply to the draft report

ESA mission on meat and milk in 2012				
No	Recommendations	Reaction of the Competent Authority	Date of compliance	Comment/attachment
1	The competent authority should ensure that staff performing official controls of the establishments receive training enabling them to undertake their duties competently as required by Article 6 of Regulation (EC) No 882/2004 and Article 5(7) and Annex I, Section III, Chapter IV of Regulation (EC) No 854/2004.	A new computer programme (Focal) has been taken up at MAST in order to organize and provide overview of the training and further education for each employee at MAST. The programme will assist in defining training needs for individual staff and aid in overall management. Annual interviews between each staff member and his director will also be used to further organize training and continued education. Training seminars are organized each year or as needed for auxiliaries.	Ongoing	
2	The competent authority should ensure that approvals are only granted to establishments that fulfil all requirements of feed and food law as set out in Regulations (EC) No 852/2004 and No 853/2004 as required by Article 31 (2)(c) and (d) of Regulation (EC) No 882/2004 and, in addition, should ensure that	The CA takes notice of this recommendation. This process is ongoing, procedures are being updated and finalized, actions coordinated and handbooks are constantly under review.	1.1.2013	

	meat and milk 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 food business operators only place products of animal origin on the market, if the animal products are prepared and handled exclusively in establishments approved according to Article 4 of Regulation (EC) No 853/2004.	A letter has been sent to Slaughterhouses to reiterate the issue. See attachment, point 8.		 Letter to SH_DVOs.doc
4	Iceland should arrange for designation of national reference laboratories in line with the requirements of Article 33 of Regulation (EC) No 882/2004.	The matter is being dealt with by the ministry of fisheries and agriculture.	1.1.2013	
5	The competent authority should ensure that laboratory methods used for analysis of microbiological criteria are accredited and fulfil all requirements of Article 12(3) and (3) of Regulation (EC) No 882/2004.	MAST will encourage laboratories analysing samples taken in official control to use only accredited methods.		
6	The competent authority should continue the implementation of harmonised procedures for performance and reporting of official controls and to ensure that corrective actions are taken when needed as required by Articles 8 and 9 of Regulation (EC) No 882/2004.	MAST has recently published a procedure concerning enforcement in cases of non-complaint FBOs. The procedures are a part of the quality system of MAST. The procedure will	1.11.12.	

		be introduced to all official inspectors at MAST.		
7	The competent authority should ensure that in case of serious or repeated 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.	MAST will take necessary action against non-compliant FBOs, as stated in procedures for enforcement which has recently been published in the quality system of MAST. The procedure will be introduced to all official inspectors at MAST.	1.11.12.	
8	The competent authority should carry out audits of good hygiene practice and HACCP-based procedures in meat and milk establishments as required by Article 4(3) 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.	The CA takes notice of this recommendation and will ensure that HACCP based procedures will be satisfactory in all establishments. This issue has been and will continue to be emphasized in inspection visits in 2012-2013.		
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.	As a follow-up of recently published guidelines for microbiological criteria this issue is prioritized in inspections in 2012. A task project on this issue will be carried out in 2012 in cooperation with the LCAs. A letter has been sent to all Slaughterhouses and DVOs to reiterate the issue. See	1.1.2013	 Letter to SH_DVOs.doc

		attachment, point 1.		
10	The competent authority should ensure that food business operators comply with the provisions for the identification marking of meat and milk products as set out in Article 5(1)(b) and Annex II, Section I to Regulation (EC) No 853/2004.	Identification marking will be emphasized in inspections in 2012. See attached letter under recommendation 9 above, point 3.	1.11.2012	
11	The competent authority should ensure that food business operators comply with the provisions for compulsory labelling of beef as required by Regulation (EC) No 1760/2000.	Rules on compulsory labelling will be further implemented and introduced to official inspectors as well as the FBOs.	1.6.2013	
12	The competent authority should ensure that food business operators operating slaughterhouses comply with all the provisions for food chain information as required by Article 3 and Annex II, Section III Regulation (EC) No 853/2004.	See attached letter under recommendation 9 above, point 4.		
13	The competent authority should ensure that post-mortem inspections for pigs and cattle are carried out in line with requirements of Article 5(1) and Annex I, Section IV of Regulation (EC) No 854/2004.	See attached letter under recommendation 9 above, point 5.		
14	The competent authority should ensure that samples are taken from all pigs and horses for examination for Trichinella as required by Regulation (EC) No 2075/2005.	All slaughterhouses have initiated sampling for Trichinella.	Completed.	