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Final report

EFTA Surveillance Authority's audit to

Iceland from 10

to 19 March 2025

on Official Controls related to General Feed Hygiene

In response to information provided by Iceland, any factual error noted in the draft report has been corrected. Comments from Iceland to the draft report are included in Annex 3 and information on the corrective actions already taken and planned are included in Annex 4 to the report.

Executive Summary

This report describes the outcome of an audit carried out by the EFTA Surveillance Authority (ESA) in Iceland from 10 to 19 March 2025.

The main objective of the audit was to verify that official controls, carried out pursuant to Regulation (EU) 2017/625, are suitable to verify operators' compliance with applicable rules in the area of feed hygiene, in particular those for:

1) *Feed hygiene laid down in Regulation (EC) No 183/2005*
2) *Methods of sampling and analysis for the official control of feed laid down in Regulation (EC) No 152/2009*
3) *Undesirable substances in animal feed laid down in Directive 2002/32/EC*
4) *Placing on the market and use of feed laid down in Regulation (EC) No 767/2009.*

The audit team found there is a system in place for planning official controls in approved feed establishments. The system includes risk-based inspections and official sampling which are supported by documented control procedures. Inspections are carried out as planned. However, the sampling plan is not consistently implemented and is carried over unchanged from one year to the next without considering potential new risks, previous results or sampling targets not being met in previous years.

There is no system in place to ensure implementation of official controls in establishments supplying feed as a by-product of food production. The Icelandic Food and Veterinary Authority (MAST) is the competent authority for the feed aspects in these establishments. MAST does control these establishments, and they have not delegated the official controls to other authorities. Consequently, there are no official controls on feed carried out in these establishments and non-compliances related to feed, remain undetected.

Staff carrying out official sampling of feed do not fully adhere to the required methods. In addition, the laboratory used for analysis of official feed samples is not designated by MAST. This may affect the legal validity of the official feed sample analysis results and weaken the effectiveness of the official control system. Furthermore, official controls do not ensure that feed business operators comply fully with all legislative requirements including labelling and the collection and storage of retained feed samples.

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 audit took place in Iceland from 10 to 19 March 2025. The audit team comprised two auditors and a legal officer from the EFTA Surveillance Authority (ESA). The audit team was also accompanied by a national expert.

ESA sent a pre-audit questionnaire to the Icelandic Ministry of Food, Agriculture and Fisheries on 3 December 2024. ESA received the reply ('the pre-audit document') on 14 February 2025.

An opening meeting was held with representatives of the Icelandic Food and Veterinary Authority ('MAST') and the Icelandic Ministry of Industries on 10 March 2025 at MAST's office in Reykjavik. At the meeting, the audit team confirmed the objective, scope and itinerary of the audit. The Icelandic representatives provided additional information to that set out in the pre-audit document.

Throughout the audit, representatives of MAST accompanied the audit team. In addition, representatives of two local competent authorities (LCAs) participated during meetings and visits to food establishments which placed feed materials on the market.

A final meeting was held at MAST's office in Selfoss on 19 March 2025 during which the audit team presented its main findings and preliminary conclusions from the audit.

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

2 Objectives and scope of the audit

The main objective of the audit was to verify that official controls carried out pursuant to Regulation (EU) 2017/625 are suitable to verify operators' compliance with applicable rules in the area of feed hygiene, in particular those for:

1) Feed hygiene laid down in Regulation (EC) No 183/2005

2) Methods of sampling and analysis for the official control of feed laid down in Regulation (EC) No 152/2009

3) Undesirable substances in animal feed laid down in Directive 2002/32/EC

4) Placing on the market and use of feed laid down in Regulation (EC) No 767/2009.

The scope of the audit included the planning and implementation of official controls, control procedures including performance of official controls on operators' hazard analysis and critical control points (HACCP) systems, traceability, labelling controls, follow-up of non-compliances and official sampling methods and laboratory analyses. The audit focussed on official controls carried out between 2021 to 2024.

The findings and conclusions of the audit are based on the information provided in the pre-audit document and documents provided by the competent authorities during the audit, complemented by interviews with authorities' staff and review of operators' documentation, interviews with operator's staff as well as on-the-spot visits at the operators' sites.

The meetings with the competent authorities and the visits to feed business operators during the audit are listed in Table 1.

Table 1: Competent authorities and establishments / sites visited during the audit

	Number	Comments
Competent authorities	5	Initial, clarification and final meetings between the audit team, MAST and the Ministry at central level. Meetings to discuss the official controls at local competent authority level.
Manufacturers of compound feed	3	Three operators producing compound feed two of which used coccidiostats. During the visits, the audit team observed official sampling in two of the establishments.
Manufacturers of feed material	2	Both operators were food producers supplying by-product(s) to the feed chain.
Fish meal and fish oil establishment	1	All production for feed.
Dryer of feed material	1	Meeting with feed business operator using a direct drying process.

3 Legal basis for the audit

The audit was carried out under the general provisions of the EEA Agreement and relevant legislation, in particular Articles 116, 117 and 119 of Regulation (EU) No 2017/625 of the European Parliament and of the Council of 15 March 2017 on official controls and other official activities performed to ensure the application of food and feed law, rules on animal health and welfare, plant health and plant protection products (the OCR), as amended and as adapted to the EEA Agreement by the sectoral adaptations referred to in Annex I thereto.

Legislation relevant to this audit is listed in Annex 2.

4 Background - Previous audits

4.1 Background information

The audit was part of ESA's planned 2025 audit programme.

ESA carried out an audit regarding the application of EEA legislation related to feed safety in 2017. The report from that audit included a number of conclusions and recommendations addressed to MAST aimed at rectifying shortcomings identified. The final report from the 2017 audit can be found on ESA's website: Final report EFTA Surveillance Authority's Mission to Iceland regarding feed safety from 8 to 17 May 2017

The present audit allowed ESA to follow-up on the actions taken by the relevant competent authorities to address certain recommendations issued following the 2017 audit.

5 Findings and conclusion

5.1 Structure of the system for official controls on feed hygiene

Legal requirements

Articles 4(1), 5(4) and 28 of Regulation (EU) 2017/625

Articles 9, 10, 11, 13 and 19 of Regulation (EC) 183/2005

Findings

5.1.1 Competent authorities involved

1. In their response to the pre-audit questionnaire, MAST provided information on the current national regulations relevant to the scope of the audit. The national regulations correspond to the legislation listed in Annex 2 to this report.
2. According to the Icelandic Country Profile, Part 1, MAST is the competent authority responsible for feed.
3. MAST's Department of Animal by-products, Feed and Fertilizer confirmed that the competent authority for official controls related to feed, in food establishments supplying by-products as feed, is MAST. MAST further explained that the responsibility for official controls in certain food establishments has been handed over to local competent authorities (Heilbrigðiseftirlitið, LCAs). There are nine LCA districts in Iceland and each LCA has control duties within its districts related to, inter alia, food safety and general hygiene.
4. MAST confirmed that, where the responsibility for official controls in certain food establishments has been handed to LCAs, MAST also expect the LCAs to be responsible for official controls related to supply of by-products used as feed. Notwithstanding, MAST has not formally delegated these controls and this is a low priority work area for MAST. Consequently, there are no official controls of the feed aspects in many such establishments. This is not in accordance with Article 9(1) of Regulation (EU) 2017/625.
5. One LCA met confirmed that Icelandic Feed Law (Article 3 of Act 22/1994 on the Supervision of Feed, Fertilizer and Seed) allows MAST to delegate certain tasks to LCAs but this had not been done. Consequently, the LCA met, does not carry out official controls related to the feed aspect of food businesses supplying by-products to the feed chain.
6. A second LCA met confirmed they had no responsibility for official controls related to the feed aspect of food businesses supplying by-products into the feed chain. This LCA was aware of two establishments supplying by-products used as feed (since at least five years) but had not informed MAST of these. No feed official controls are carried out in these establishments and the establishments are not recorded on the publicly available MAST list of registered feed premises.
7. According to the pre-audit document, all new staff undergo initial basic training and written procedures are available for this in MAST quality manual (LBE-151). Employees carrying out official controls then complete specialised training relevant to their role. MAST confirmed that an element of this involves mentoring from more experienced staff. In addition, the audit team saw evidence of relevant staff participating on Better Training Safer Food (BTSF) courses on e.g. controls on contaminants in feed and food, EU legislation on feed and HACCP (hazard analysis and critical control points).
8. MAST has a documented quality management system in place. Several of the procedures and work instructions are relevant to the scope of the audit, describing the procedures for carrying out official feed controls. These documents include:

Control Manual on Feed (LBE-079), risk and performance classification for food of animal origin and feed, a procedure for taking feed samples (GAT-024) and guidance on the approval of establishments (VLY-001).

5.1.2 Registration and approval of feed business operators

9. Guidance for MAST staff on procedures to follow for approval and registration of feed establishments is available (Documents VLY-001 and VLY-023). MAST demonstrated to the audit team the website information available to the public when applying for approval and registration of feed businesses. The audit team considered the MAST guidance and website information sufficient to assist official staff complete their duties and members of the public to apply for approval or registration of feed businesses.
10. MAST is responsible for publishing the lists of registered and approved feed establishments on the internet as required by Article 19(3) and (7) of Regulation (EC) No 183/2005. The list of approved feed establishments and the official approval documentation does not include the ISO code of the Member State where the feed business is located as part of the identifying number. MAST stated that they were aware of these omissions, but no rectification had taken place at the time of the audit. This is not in compliance with Annex V of Regulation (EC) No 183/2005. Notwithstanding, the audit team observed that all approved manufacturers of compound feed visited were using the correct identifying number on the labels of their product.
11. A list of registered feed businesses is also available on the MAST website. The audit team noted, and MAST confirmed, this is not a complete list as it does not include e.g. all establishments supplying by-products used as feed (see paragraph 6).

Conclusions

12. The feed aspect in food establishments supplying by-products for the feed chain is currently not well regulated with negligible official controls performed and non-compliances not being detected.
13. The absence of the ISO code of the Member State where the feed business is located as part of the identifying number reduces the full traceability of the feed.

5.1.3 Planning and implementation of official controls on feed hygiene

Legal Requirements

Articles 5 and 9 of Regulation (EU) 2017/625

Findings

5.1.3.1 *Planning of inspections*

14. Guidance on risk classification in food and feed establishments is available for MAST staff to determine the official control requirements of establishments. The guidance has been applicable since 2012 and was last updated in 2016.
15. MAST performs a risk assessment based on the activity of the business e.g. type of raw material used, use of additives and premixtures, import of feed, use of coccidiostats. A score is given for each risk and the total score determines the number of official control hours allocated on an annual basis.

16. MAST confirmed that a schedule of inspections for feed business operators is made each year. Currently, all feed business operators are evaluated as risk category 2, meaning 20 hours of official control per year. If no non-compliances are observed during the previous year, inspection hours are reduced by 50%. The audit team verified this approach in two feed business operators where official control hours had been halved in 2024 and also saw records to demonstrate these allocated control hours had been used.
17. According to the pre-audit document, the Division of Co-ordination at MAST head office, along with staff from Divisional Veterinary Offices (DVOs), are responsible for feed official controls at primary production. Staff from the Division of Co-ordination at MAST head office are responsible for performing official controls in feed business operators such as compound feed producers. Prior to an inspection in these establishments, the inspector opens a new control document in ÍsLeyfur (MAST database). Any previous non-compliances are automatically populated in the control document and the inspector selects additional inspection points to check.
18. MAST confirmed they aim to cover all inspection points in LBE-079 each year and the points in the ÍsLeyfur inspection report correspond to the LBE-079 points. However, MAST stated that due to lack of resources, they are unable to cover all points each year.
19. MAST confirmed that official controls in food establishments supplying by-products to the feed chain are not a priority for them. This low priority was reinforced in establishments visited where the audit team found deficiencies related to e.g. risk analysis, labelling of by-products supplied to the feed chain and a lack of transport documentation.

5.1.3.2 *Implementation of inspections*

20. Inspection reports were available for all manufacturers of compound feed and fish meal and fish oil establishments visited. These written records of official controls contained the information required by Article 13(1) of Regulation (EU) 2017/625.
21. In establishments visited, the audit team reviewed the HACCP plans and noted appropriate critical control points (CCPs) had been identified. In the hazard identification section of one HACCP plan, there was no mention of pesticides or heavy metals as potential hazards for cereal intake. The hazard identification section of another HACCP plan grouped all cereals together with the same risks. No consideration was given to e.g. maize (products) having a higher risk of contamination with aflatoxins or rye and wheat having a greater risk of the presence of ergot. In addition, the second hazard identification section did not include pesticides as a hazard even though the feed business operator tests once per year for pesticides and receives supplier declarations for pesticides. These issues had not been identified or discussed during previous official controls.
22. The audit team confirmed that in one food establishment supplying by-products to the feed chain, no retained samples were kept. Furthermore, in two feed business operators producing compound feed, retained samples were kept but were not sealed to prevent adulteration. This had not been detected during official controls and is not in compliance with point 4 of the section “Quality Control” of Annex II of Regulation (EC) No 183/2005.
23. The requirement for feed business operators to demonstrate the effectiveness of mixers with regard to homogeneity (point 3 of the section "Facilities and equipment" of Annex II of Regulation (EC) No 183/2005) is one of the inspection points that can

be included in the MAST control document (see paragraph 17). Point 6.23.3 of LBE-079 states that evaluation of hazards (HACCP) should include homogeneity.

24. In the three compound feed establishments visited, the audit team reviewed the feed business operator's homogeneity testing and interviewed responsible MAST staff. In all three establishments, homogeneity testing had been completed by the feed business operators and MAST were seen to have analysed the feed business operators results. MAST have developed a spreadsheet where the individual test results are populated, and the coefficient of variation calculated and compared to a target coefficient of variation value.

25. In one establishment visited, the audit team reviewed the feed business operators standard operating procedure (SOP) for homogeneity testing and noted:

    i) the feed business operator used a different feed ingredient for the homogeneity test to that noted in their SOP

    ii) SOP describes the homogeneity test in a feed no longer produced and

    iii) SOP states homogeneity test is performed twice / annum even though the last test was performed in 2023.

    These points were not noted by MAST during their inspections.

26. The requirement for feed business operators to avoid or minimise cross contamination (point 3 of the section "Production" of Annex II of Regulation (EC) No 183/2005) is one of the inspection points that can be included in the MAST control document (see paragraph 17). Point 6.23.3 of LBE-079 states that evaluation of hazards (HACCP) should include cross contamination.

27. In two compound feed establishments visited, which manufacture feed containing coccidiostats, the audit team reviewed the feed business operators' procedures to avoid cross contamination and interviewed responsible MAST staff. In both establishments, flushing was used. A quantity of an appropriate feed ingredient is passed through the feed manufacturing system immediately after the production of feed containing coccidiostats to "flush" out any remaining active substance. The feed ingredient used for flushing was then only used in the production of feed containing coccidiostat.

28. MAST was aware of the feed business operators' procedures, had access to their laboratory results and audit team saw evidence that MAST take post-flush samples to verify feed business operator test results for coccidiostat concentrations.

29. MAST verification that operators meet legislative labelling requirements is one of the inspection points that can be included in the MAST control document (see paragraph 17). Point 5.23 of LBE-079 requires inspectors to check that feed business operator procedures ensure the correct information is always on labels or accompanying documents. The audit team observed labelling had been included as a check point by MAST in the compound feed establishments visited.

30. In all feed business operators visited, the audit team evaluated operators' labels and other relevant documents and interviewed the inspectors responsible for the establishments. In the majority of establishments visited by the audit team, labelling discrepancies were observed such as:

    - A feed containing coccidiostat did not include a description of the type of feed as required by Article 15(a) of Regulation (EC) 767/2009 or a warning stating the feed was "Dangerous for equines" as required by Regulation (EU) No 140/2012.

- A complementary mineral feed for cattle did not include the mandatory information on calcium, sodium, phosphorus and magnesium as required by Point 1 of Chapter II in Annex VI of Regulation (EC) 767/2009.
- A complementary feed for cattle listed urea as a feed material rather than a feed additive as required by Point 1 of Chapter I in Annex VI of Regulation (EC) 767/2009.
- In the food establishments supplying by-products for the feed chain, there was no labelling of the by-products and no documentation accompanied the batches as required by Article11(2) of Regulation 767/2009.
- Data on feed business operator websites of certain establishments visited by the audit team, included information that a feed containing coccidiostats was suitable for, inter alia, geese and ducks. According to Regulation (EU) No 140/2012, the active substance (monensin) is not listed as being authorised for use in these animals.

None of these discrepancies were identified during recent official controls.

31. The last MAST internal audit report related to feed was carried out in 2023 as part of the national multiannual programme 2019 – 2023. The audit criteria included Regulation (EC) 152/2009 on methods of sampling and analysis for the official control of feed and Regulation (EC) 183/2005 on requirements for feed hygiene. MAST confirmed that the report recommendations applied to primary production and aquaculture. The internal report found that official procedures and control reports in other feed businesses were satisfactory.

Conclusions

32. There is a system in place for planning official controls in approved feed establishments which includes risk-based inspections which is supported by the provision of guidance for officials. Inspections are carried out as planned but their effectiveness is weakened due to non-compliances related to e.g. labelling and retained samples not being detected.

5.1.4 Sampling and analysis

Legal requirements

Points 3, 5.1, 5.2, 9 and 10 of Annex I of Regulation (EC) 152/2009

Findings

5.1.4.1 *Planning of official sampling*

33. According to the pre-audit document, the sampling plan (sampling sites, frequency and number of samples) will be reviewed as part of reorganisation of the Department of Animal by-products, Feed and Fertilizer. MAST confirmed that currently, the sampling plan is carried over unchanged from one year to the next with no changes. This has been the case for many years with no consideration given to e.g. the Rapid Alert System for Feed and Food (RASSF) or non-compliances detected by MAST.

34. According to the pre-audit document, MAST have prepared guidance for official sampling of feed “Sýnataka af fóðri.” Inspectors also have access to a video on sample preparation. The guidance does not fully describe the requirements of Regulation (EC) 152/2009. Areas not covered by guidance include:

    i) the requirement to determine the sampled portion

ii) minimum weight for incremental sample size

iii) the requirement to vary the minimum number of incremental samples depending on whether the constituents or substances being sampled are likely to be distributed uniformly or non-uniformly in feed.

5.1.4.2 *Implementation of official sampling*

35. The audit team observed sampling in two compound feed manufacturers visited and proposed the feed type and substance for the sampling exercises. In general, the inspectors used appropriate apparatus for the sampling of solid feed and for the preparation of reduced samples in a representative way. However, they did not have a means to weigh the various samples to check e.g. the minimum size of aggregate sample or minimum weight of final samples had been taken. This is not in accordance with Annex I (point 5.3 and 7) of Regulation (EC) No 152/2009).

36. The samples were sealed and labelled in such a way that they could not be opened without damaging the seal as required by point 9.5 of Annex I of Regulation (EC) 152/2009.

37. In both cases, the inspectors did not ascertain the size of the sampled portion and consequently, could not calculate the minimum number of incremental samples required. This is not in accordance with point 5 and 10 of Annex I of Regulation (EC) 152/2009. The inspectors confirmed that their target was to obtain a 2 kg aggregate sample when sampling for official controls and then to prepare representative final samples by representative dividing. This is not in accordance with point 6 of Annex I of Regulation (EC) 152/2009.

38. Feed inspectors interviewed confirmed that when sampling for substances likely to be distributed non-uniformly in feed, they took the same approach as for sampling substances uniformly distributed throughout the feed. There was no adjustment made to increase the number of incremental samples taken when sampling for substances non-uniformly distributed. This is not in accordance with Annex I (point 5.2) of Regulation (EC) 152/2009.

39. According to the pre-audit document, the planned numbers of official feed samples were not taken in e.g. 2023 and 2024.

5.1.4.3 *Testing of official feed samples*

40. MAST confirmed that all official feed samples are sent to a laboratory located in another Member State which carries out the laboratory analyses and tests. Test results are sent directly to the sampling officer who is responsible for reviewing the laboratory reports and forwarding the results to the relevant feed business operator.

41. According to the pre-audit document, MAST use a laboratory based in another EEA Member State to carry out the laboratory analyses and tests of official feed samples. MAST confirmed they have not designated this laboratory as an official laboratory. This is not in accordance with Article 37 of Regulation (EU) 2017/625.

5.1.4.4 Actions taken on non-compliances

42. The audit team reviewed recent inspection reports for the establishments visited during the audit. Examples were seen of non-compliances being followed up and recorded as rectified during subsequent official inspections. This is as required by Article 138 of Regulation (EU) 2017/625.

Conclusions

43. The sampling plan is carried over unchanged from one year to the next with no consideration given to the possibility of new risks, previous results and sampling targets not being met in previous years.

44. Staff carrying out official sampling does not fully adhere to the sampling plan or the prescribed methods required. This, in combination with the fact that the laboratory used for analysis of official feed samples is not designated as an official laboratory by MAST, may affect the legal validity of the official feed sample analysis results and weaken the effectiveness of the official control system.

6 Overall conclusion

The audit team found there is a system in place for planning official controls in approved feed establishments. The system includes risk-based inspections and official sampling which are supported by documented control procedures. Inspections are carried out as planned. However, the sampling plan is not consistently implemented and is carried over unchanged from one year to the next without considering potential new risks, previous results or sampling targets not being met in previous years.

There is no system in place to ensure implementation of official controls in establishments supplying feed as a by-product of food production. The Icelandic Food and Veterinary Authority (MAST) is the competent authority for the feed aspects in these establishments. MAST does not control these establishments and they have not delegated the official controls to other authorities. Consequently, there are no official controls on feed carried out in these establishments and non-compliances related to feed, remain undetected.

Staff carrying out official sampling of feed do not fully adhere to the required methods. In addition, the laboratory used for analysis of official feed samples is not designated by MAST. This may affect the legal validity of the official feed sample analysis results and weaken the effectiveness of the official control system. Furthermore, official controls do not ensure that feed business operators comply fully with all legislative requirements including labelling and the collection and storage of retained feed samples.

7 Final meeting

A final meeting was held on 19 March 2025 at MAST's office in Selfoss with representatives from MAST, the Icelandic Ministry of Industries and Local Competent Authorities. At this meeting, the audit team presented its main findings and preliminary conclusions in relation to which the authorities did not express any disagreement.

8 Recommendations

In order to facilitate the follow-up of the recommendations hereunder, Iceland should notify ESA no later than 22 August 2025 by way of written evidence, of additional corrective actions planned or taken other than those already indicated in the reply to the draft report. ESA should be kept continuously informed of changes made to the already notified corrective actions and measures, including changes of deadlines for completion, and completion of the measures included in the timetable.

No	Recommendation
1	MAST should ensure that a system is in place for the implementation of official controls in food establishments supplying by-products to the feed chain. Legal basis: Article 9(1) of Regulation (EU) 2017/625. Recommendation based on conclusion: 12. Associated finding: 2, 3, 4, 5 and 6.
2	MAST should ensure that staff carrying out official sampling apply practices to ensure the legal validity of the official feed samples taken. Legal basis: point 10 of Annex I of Regulation (EC) No 152/2009. Recommendation based on conclusion: 44. Associated finding: 34, 35, 37 and 38
3	MAST should make sure that official controls ensure that feed business operators comply with legislative requirements concerning the appropriateness of retained samples. Legal basis: Point 4 of the section "Quality control" of Annex II to Regulation (EC) No 183/2005. Recommendation based on conclusion: 32. Associated finding: 22.
4	MAST should ensure that the contracted feed testing laboratory is designated as an official laboratory and meets the requirements for such designation. Legal basis: Articles 37(2)(3) and 39 of Regulation (EU) 2017/625. Recommendation based on conclusion: 44. Associated finding: 41.
5	MAST should have procedures and / or arrangements in place to ensure the effectiveness of official controls in relation to labelling. Legal basis: Article 5(1)(a) of Regulation (EU) 2017/625. Recommendation based on conclusion: 32. Associated finding: 30.

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

ESA	EFTA Surveillance Authority
EEA	European Economic Area
EEA Agreement	Agreement on the European Economic Area
EU	European Union
HACCP	Hazard analysis and critical control points
ÍsLeyfur	A database developed by MAST to store and maintain information on approved and registered establishments as well as the results from official control carried out in the food and feed sector by MAST and some local competent authorities.
LCA	Local Competent Authority / Heilbrigðiseftirlit sveitarfélaga (Municipal Environmental and Public Health Offices)
MANCP	Single integrated multi annual national control plan

Annex 2 - Relevant legislation

The audit takes into consideration all EEA law relevant for the scope of the audit. The following table lists the main legal acts of relevance, as amended and as adapted to the EEA Agreement by the specific and sectoral adaptations referred to in Annexes I and II to that Agreement, but the list may not be exhaustive:

No	EEA Reference	Title
a)	Point 11b in Part 1.1 of Chapter I and Point 31q of Chapter II of Annex I and Point 164 of Chapter XII of Annex II	Regulation (EU) 2017/625 of the European Parliament and of the Council of 15 March 2017 on official controls and other official activities performed to ensure the application of food and feed law, rules on animal health and welfare, plant health and plant protection products, amending Regulations (EC) No 999/2001, (EC) No 396/2005, (EC) No 1069/2009, (EC) No 1107/2009, (EU) No 1151/2012, (EU) No 652/2014, (EU) 2016/429 and (EU) 2016/2031 of the European Parliament and of the Council, Council Regulations (EC) No 1/2005 and (EC) No 1099/2009 and Council Directives 98/58/EC, 1999/74/EC, 2007/43/EC, 2008/119/EC and 2008/120/EC, and repealing Regulations (EC) No 854/2004 and (EC) No 882/2004 of the European Parliament and of the Council, Council Directives 89/608/EEC, 89/662/EEC, 90/425/EEC, 91/496/EEC, 96/23/EC, 96/93/EC and 97/78/EC and Council Decision 92/438/EEC (Official Controls Regulation)
b)	Point 13 in Part 7.1 of Chapter I and Point 41 of Chapter II of Annex I and Point 54zzzc of Chapter XII of Annex II	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
c)	Point 31m of Chapter II of Annex I	Regulation (EC) No 183/2005 of the European Parliament and of the Council of 12 January 2005 laying down requirements for feed hygiene
d)	Point 31o of Chapter II of Annex I	Commission Regulation (EC) No 152/2009 of 27 January 2009 laying down the methods of sampling and analysis for the official control of feed
e)	Point 1a and 48 of Chapter II of Annex I	Regulation (EC) No 767/2009 of the European Parliament and of the Council of 13 July 2009 on the placing on the market and use of feed, amending European Parliament and Council Regulation (EC) No 1831/2003 and repealing Council Directive 79/373/EEC, Commission Directive 80/511/EEC, Council

		Directives 82/471/EEC, 83/228/EEC, 93/74/EEC, 93/113/EC and 96/25/EC and Commission Decision 2004/217/EC

f)	Point 33 of Chapter II of Annex I	Directive 2002/32/EC of the European Parliament and of the Council of 7 May 2002 on undesirable substances in animal feed - Council statement
g)	Point 12 in Part 7.1 of Chapter I of Annex I	Regulation (EC) No 999/2001 of the European Parliament and of the Council of 22 May 2001 laying down rules for the prevention, control and eradication of certain transmissible spongiform encephalopathies, as amended and as adapted to the EEA Agreement by the sectoral adaptations referred to in Annex I to that Agreement;

Annex 3 - Iceland's comments to the draft report

Comments from MAST on factual error in ESA draft report, feed hygiene

The Icelandic Food and Veterinary Authority (MAST) would like to put forward the following comment to finding no. 30, bullet point 3, namely the assumption given in the finding on copper level which is incorrect. The product in question is complementary feedingstuff and not complete feed. In the draft report finding no. 30, bullet point 3 reads as follows:

- "*A complementary feed for cattle listed a copper level in excess of the maximum permitted level established in Regulation (EU) 2018/1039 and the same feed listed urea as a feed material rather than a feed additive as required by Point 1 of Chapter I in Annex VI of Regulation (EC) 767/2009.*"

Correction:
The declared level of copper was 50 mg/kg according to the labelling of the feed. Maximum levels of copper in complete feed for bovine animals are set according to Regulation (EU) 2018/1039, 20 mg/kg. In the case of complementary feedingstuffs, the level may be 100 times the maximum level, in line with Art. 8, reg. (EU) 767/2009 that reads as follows:

- "*Without prejudice to the conditions of use provided for in the relevant legal act authorising the respective feed additive, feed materials and complementary feed shall not contain levels of feed additives that are higher than 100 times the relevant fixed maximum content in complete feed or five times in case of coccidiostats and histomonostats.*"

The Icelandic Food and Veterinary Authority requests that this error be corrected in the draft report and reflected in the final report.

Annex 4 - Iceland's action plan for corrective measures

CAP – Corrective Action Plan ESA mission 2020 to evaluate official controls on General Feed Hygiene, Audit ID 2025/ICE/1

No	Recommendation	Responsible Authority	Corrective action	Date of compliance
1	MAST should ensure that a system is in place for the implementation of official controls in food establishments supplying by-products to the feed chain. Legal basis: Article 9(1) of Regulation (EU) 2017/625. Recommendation based on conclusion: 12. Associated finding: 2, 3, 4, 5 and 6.	MAST	A meeting between Mast and the LCA has been scheduled on 12 of june. In this meeting MAST will propose an update of the existing agreement between MAST and the LCA's delegating control activities from MAST to the LCA´s. In this updated agreement the official control of food producing establishment providing co-products to certain feed establishments will be included. Following an updated agreement the department responsible for feed at MAST will update the inspection manual and provide training of LCA´s personal as needed. Timeline: • To finalise the agreement between the two authorities 15. September 2025 • Update of inspection manual 31 desember 2025 • Training of af LCA´s personsl 1Q 2026	15.09.2025 31.12.2025 31.03.2026
2	MAST should ensure that staff carrying out official sampling apply practices to ensure the legal validity of the official feed samples taken. Legal basis: point 10 of Annex I of Regulation (EC) No 152/2009. Recommendation based on conclusion: 44. Associated finding: 34, 35, 37 and 38	MAST	A review and update of procedures for sampling in official feed control has been carried out and put in place. New revised procedure was issued 28.05.2025, see attached document no. LBE-246. Updated sampling procedures and practices are in line with and reflect point 10 of Annex I of Regulation (EC) No 152/2009. Staff carrying out official sampling have been informed and trained accordingly (Head of department and Senior Officer). Sampling during official control on feed will be carried out in line with updated procedures as of 01.06.2025	28.05.2025 01.06.2025
3	MAST should make sure that official controls ensure that feed business operators comply with legislative requirements concerning the appropriateness of retained samples. Legal basis: Point 4 of the section "Quality control" of Annex II to Regulation (EC) No 183/2005. Recommendation based on conclusion: 32. Associated finding: 22.	MAST	Information on sealing and storage of production samples will be sent to feed operators, see attached copy of the letter dd 04.06. 2025. Checking of the sealing and storage of retained samples will be included in the inspection manual, a review and update of the inspection manual will be finalized by 01.09.2025. During next regular audits of feed operators these issues will be followed up. Audits are planned and will be finished by 31.12.2025, see attached inspections plan for Q3 2025	04.06.2025 01.09.2025 31.12.2025
4	MAST should ensure that the contracted feed testing laboratory is designated as an official laboratory and meets the requirements for such designation. Legal basis: Articles 37(2)(3) and 39 of Regulation (EU) 2017/625. Recommendation based on conclusion: 44. Associated finding: 41.	MAST	The currently used laboratory was designated as an official laboratory for feed samples according to regulation EU no. 2004/882 and included on a list of Official Laboratories on Mast webpage https://www.mast.is/is/um-mast/eftirlitsnidurstodur/rannsoknastofur However, the designation needs renewal by a written designation according to art. 37 and 38 of reg EU 2017/625. This laboratory is designated official laboratory for organic farming samples and veterinary residues samples by the CA in the EU country where the lab is located. The lab has last year, applied for OL status for feed analysis to the CA but the process for designation has not started. Iceland will monitor the situation and start designation process as soon as the lab has the status of official laboratory feed in its home country.	30.09.2026

			If the laboratory fails to obtain status as official laboratory for feed, iceland will look for an alternative laboratory to designated. Timeline: • 3Q 2026	
5	MAST should have procedures and / or arrangements in place to ensure the effectiveness of official controls in relation to labelling. Legal basis: Article 5(1)(a) of Regulation (EU) 2017/625. Recommendation based on conclusion: 32. Associated finding: 30.	MAST	The inspection manual for feed inspections already describes official control on the labelling of feed products, however it needs to be reviewed and updated in order to meet requirements of the feed legislation Reg. (EU) no. 767/2009. An updated chapter regarding official control on labelling in the feed inspection manual will be finalized and implemented latest by 31.12.2025.	31.12.2025