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Brussels, 18 December 2025
Case No: 93979
Document No: 1580666

Final report

EFTA Surveillance Authority's audit to Norway

from 6 to 15 October 2025

on Official Controls related to General Feed Hygiene

In response to information provided by Norway, any factual error noted in the draft report has been corrected; any clarification appears in the form of a footnote. Comments from Norway 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 Norway from 6 to 15 October 2025.

The main objective of the audit was to verify that official controls, carried out in accordance with Regulation (EU) No 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 procedures are in place for the planning and delivery of official feed controls in approved feed establishments which are supported by documented control procedures. Inspections and sampling are carried out as planned but the effectiveness of these controls is weakened due a range of non-compliances being undetected and consequently not acted on by the competent authority e.g. traceability, cross-contamination, retained samples, and infrastructure requirements. These significant non-compliances increase the likelihood that non-compliant feed is placed on the market.

In addition, the feed aspect of food establishments supplying by-products to the feed industry is not well regulated with negligible official controls performed and non-compliances going undetected.

The official controls by the competent authority on feed business operators which produce both compound feed for ruminants and compound feed for non-ruminant farmed animals which contains fish meal are weak and do not ensure feed business operators comply with regulatory requirements. Specifically, the official controls do not ensure that compound feed for ruminants and compound feed for non-ruminants which contains fish meal are produced and stored in physically separate locations. According to the most recent EFSA opinion, even with low risk, the law requires that feed safety is assured, so strict separation of fishmeal and ruminant feedstuff is necessary.

Staff perform official sampling of feed in a satisfactory manner. The laboratory network for analysis of official feed samples consists of laboratories located in Norway and other EU Member States. These laboratories generally meet the requirements of official laboratories with the exception that laboratories in other member states are not designated by the Norwegian competent authorities.

The report includes six recommendations addressed to the 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 Norway from 6 to 15 October 2025. The audit team comprised two auditors from the EFTA Surveillance Authority (ESA), a national expert and an observer from DG SANTE, Directorate F.

ESA sent a pre-audit document to the Norwegian Ministry of Agriculture and Food on 23 May 2025. ESA received the reply to the pre-audit document on 16 September 2025.

An opening meeting was held with representatives of the Norwegian Food Safety Authority (NFSA), the Ministry of Trade, Industry and Fisheries and the Ministry of Agriculture and Food on 6 October 2025 at NFSA's office in Oslo. At the meeting, the audit team confirmed the objective, scope and itinerary of the audit. The Norwegian representatives provided additional information to that set out in the pre-audit document.

Throughout the audit, representatives of NFSA accompanied the audit team.

The closing meeting was held at NFSA's office in Oslo on 15 October 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 in accordance with 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 focused on official controls carried out between 2022 to 2025.

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	6	Initial, clarification and final meetings and meetings to discuss the official controls at local competent authority level.
Manufacturers of compound feed	4	Four operators producing compound feed one 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-products to the feed chain.
Fish meal and fish oil establishment	1	All production for feed.
Feed additive / premixture manufacturer	1	
Official laboratory	1	

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 last carried out an audit on the application of EEA legislation related to feed safety in Norway in 2016. The report from that audit included a number of conclusions and recommendations addressed to NFSA aimed at rectifying shortcomings identified. The final report from the 2016 audit can be found on ESA's website: Final 2016 feed report.

The present audit allowed ESA to follow-up on the actions taken by the relevant competent authorities to address certain recommendations issued following the 2016 audit.

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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) No 2017/625

Articles 9, 10, 11, 13 and 19 of Regulation (EC) No 183/2005

Findings

5.1.1 Competent authorities involved

1. In their response to the pre-audit questionnaire, NFSA 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 Norwegian Country profile Part 1, NFSA is the competent authority responsible for feed. NFSA confirmed this responsibility includes official controls in food establishments sending by-products to the feed chain.
3. NFSA further confirmed that, from 1 May 2025, they have undergone restructuring with changes to the organisation of their tasks and responsibilities. Instead of geographical organisation with five regional units, official controls are now delivered on a national basis by four Inspection Divisions based on subject. Official control of feed is part of the Inspection Division: Plants, Feed and Drinking Water.
4. According to the pre-audit document, NFSA have developed different procedures / instructions for the inspectors related to general feed hygiene and these documents are available in NFSAs quality system. These documents include: procedure for inspection of HACCP (hazard analysis and critical control points), instruction for sampling of feed and interpretation of laboratory analysis.
5. NFSA confirmed they have an internal learning portal with various courses to ensure staff competency. Relevant courses for the scope of this audit include inspection methodology (inspection, audit and sampling competence) and communication during audit. In addition, training sessions were organised related to the focus area of annual inspections e.g. use of premix and feed additives in production of compound feeds (2024) and undesirable substances (2023). In addition, the audit team saw evidence of relevant staff participating on Better Training Safer Food (BTSF) courses on e.g. HACCP and transmissible spongiform encephalopathies and animal by-products.

5.1.2 Registration and approval of feed business operators

6. According to the pre-audit document, it is the responsibility of feed business operators to register on-line. If, during the registration process, the feed business operator indicates that they use e.g. coccidiostats or processed animal protein, then their enquiry is diverted to a member of NFSA feed team who will follow up regarding approval of the establishment.
7. Table 1 represents the number of registered / approved feed business operators in Norway listed according to their main activity.

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Table 1. Registered and approved FeBO

Type of feed business operators	Number of establishments (18.08.2025)	
	Registered	Approved
Feed material(s) manufacturers	284	2
Compound feed manufacturers	109	28
Feed importers	943	--
Feed transporters	380	--
Storage of feed	137	--
Feed traders	1214	13
Feed additives(s)/premixture(s) manufacturers	12	4
Feed business operators active in the primary (production) sector	73	--
Medicated feed manufacturers	0	3
Total	**3152**	**50**

8. NFSA confirmed guidance is available on their website which explains the procedure for registration and approval of businesses in the feed chain. Feed business operators, such as primary producers and compound feed producers can register or apply for approval via this website.
9. NFSA 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 audit team noted that the publicly available list of approved feed establishments does not include the alpha character (α) as part of the identifying number and that some establishments were listed twice. NFSA confirmed they were aware of the errors and explained the corruption of data occurred during migration of information to a new database. This issue has been ongoing for over a year and NFSA could not provide a timeline for resolution. This is not in accordance with Annex V of Regulation (EC) No 183/2005.
10. A list of registered feed businesses is available on the NFSA website. The audit team noted, and NFSA confirmed, this is not a complete list as it does not include all food establishments supplying by-products to the feed chain.

Conclusions

11. The structure of the competent authority is clearly defined and there is a system in place for the registration and approval of feed business operators.
12. The absence of the α character, 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) No 2017/625

Findings

5.1.3.1 *Planning of inspections*

13. According to the pre-audit document, NFSA prepare a multi-annual control plan based on risk assessments. Each year, an annual control plan is developed by headquarters

(NFSA operative plan) which is presented to inspectors. The competent authority confirmed that from 2026 the multi-annual and annual control plans will be the responsibility of the new Divisions. The recent subject area(s) selected for inspection are shown in Table 2.

Table 2. Feed area(s) selected for inspection

Year	Subject for inspection
2022	Official control with HACCP and salmonella
2023	Official control with quality control and undesirable substances
2024	Official control with the use of premix and feed additives in production of compound feed
2025	Official control with fundamental premises for feed hygiene

14. For each subject area, guidance and dedicated checklists were available for inspectors in NFSA's case processing and decision support tool (MATS).
15. According to the pre-audit document, inspections are not planned with a fixed number of inspections. The competent authority confirmed there was no common procedure to determine the frequency of inspections – this was done at a local level based on e.g. evaluation of previous official controls, HACCP implementation and enforcement history. Data provided in the pre-audit document demonstrated a year- on-year decrease in the number of inspections carried out at feed business operators between 2022 to August 2025. For 2022, 2023, 2024 and 2025 (to August) the number of feed businesses inspections were 287, 222, 103 and 44 respectively.
16. The competent authority confirmed that, from 2019, they perform a specific type of audit at feed business operators producing compound feed for aquaculture animals and farmed animals that are part of a chain or corporate group. Audits are carried out at the central unit / head office of the chain / corporation with verification inspections carried out at selected feed businesses belonging to the chain / corporate group. With the exception of feed establishments which send by-products to the feed chain, inspection reports were available for all establishments visited by the audit team.

5.1.3.2 *Implementation of inspections*

17. Inspection reports were available for all feed business operators producing 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) No 2017/625. In the two food establishments visited by the audit team which sent by-product to the feed chain, no inspection reports were available for one establishment and the inspection report for the second establishment focussed on the food aspect of the business.
18. In most establishments visited, the audit team reviewed the feed business operators HACCP plans. In the hazard identification section for two feed business operators, the audit team noted no consideration was given to e.g. rye and wheat having a greater risk of the presence of ergot. In one of the HACCP plans, it took approximately two months for HACCP documentation to be updated following an incident involving the

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inclusion of excessive vitamin D in a compound feed. In the two food establishments visited which supply by-products to the feed chain, the audit team noted one HACCP plan did not mention feed and the flowchart of the second establishment did not show the possibility that food by-products produced on-site could be diverted to the feed chain. This is not in accordance with Article 6 of Regulation (EC) No 183/2005.

19. Samples of each batch of product manufactured and placed on the market by feed business operators producing compound feed were available in the establishments visited by the audit team. In two of the feed business operators visited, retained samples were not always sealed to prevent adulteration. In addition, two feed business operators discarded the retained samples before the shelf life of the compound feed had expired. These non-compliances had not been detected during official controls and are not in compliance with point 4 of the section “Quality Control” of Annex II of Regulation (EC) No 183/2005.

20. There is a 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). According to NFSA guidelines for the supervision of HACCP in feed establishments, homogeneity is one of the areas that can be evaluated during inspection.

21. In one establishment visited, homogeneity tests were performed by the feed business operator one to two times per year. For each test, the audit team saw evidence that the coefficient of variation (CV) was calculated using ten individual laboratory results and the feed business operator had set the CV threshold at 10. A recent NFSA inspection report noted that the feed business operator was not satisfied with the recent results, but NFSA did not investigate further. This despite the most recent CV value being 10.9 and previous CV values had been as high as 15.

22. In a second establishment, the audit team saw evidence that the feed business operator carried out homogeneity testing and calculated the CV value. However, the feed business operator confirmed they had not set a CV threshold. This had not been noted by the competent authority.

23. NFSA confirmed that national legislation restricts the types of coccidiostats that can be used in Norway, there is no import of feed with coccidiostats and there is very limited use of coccidiostats in feed.

24. There is a 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). According to NFSA guidelines for the supervision of HACCP in feed establishments, cross contamination with coccidiostats is one of the areas that can be evaluated during inspection.

25. In one feed business operator visited by the audit team, a satisfactory procedure for flushing following the use of coccidiostats was available even though coccidiostats were no longer used in the establishment. Flushing involved passing a quantity of an appropriate feed ingredient through the feed manufacturing system immediately after the production of feed containing coccidiostats to “flush” out any remaining active substance.

26. In a second feed business operator visited, coccidiostats were still used. A procedure, to prevent cross contamination, had been in place for six years and described the process of flushing which included the flush material being mixed with standard feed and not stored separately or discarded. The feed business operator confirmed they had not sampled post-flush material for coccidiostats for at least three years (no laboratory results were available) to verify the effectiveness of flushing. In addition, the feed business operator confirmed that following their most recent production run using coccidiostats, they had not carried out a flushing exercise. This is not in accordance with point 3 of the section "Production" of Annex II of Regulation (EC) No 183/2005.

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The competent authority was not aware of any of these issues despite performing inspections at this establishment in 2022, 2023 and 2024.

27. Compound feed intended for ruminants must be manufactured and kept, during storage, transport and packaging, in facilities that are physically separate from those facilities where compound feed for non-ruminants using, inter alia fishmeal, are manufactured and kept; (Annex IV, Ch III, Sect B(2)(a) of Regulation (EC) No 999/2001). NFSA guidance document, "Restrictions on the use of proteins and minerals of animal origin in feed", adequately describes this requirement.

28. In one feed business operator visited by the audit team, there was not physical separation of the entire production lines for ruminant feed and non-ruminant feed containing fishmeal. The production lines were physically separated only to the point of storage. The same equipment was used for loading transport vehicles with feed containing fishmeal and ruminant feed. i.e. this absence of complete physical separation of the two lines may result in contamination of ruminant feed with fishmeal. The feed business operator confirmed they clean the loading equipment once per week (they had no written procedure[1]) and test ruminant feed for detection of fishmeal twice per month by microscopy. This lack of physical separation is not in accordance with Annex IV, Ch III, Sect B(2)(a) of Regulation (EC) No 999/2001 and had not been addressed by the competent authorities.

29. In a second feed establishment visited, which had two production lines, the feed business operator confirmed that until 2024, they had used fishmeal on both lines during a period when they also produced compound feed for ruminants. This is not in accordance with Annex IV, Ch III, Sect B(2)(a) of Regulation (EC) No 999/2001. The competent authority confirmed they had never discussed the requirement for physical separation between feed production lines for ruminants and the feed production line for non-ruminants which used fishmeal with the feed business operator.

30. According to the pre-audit document, inspection of labels has not been a selected area for official control in the period 2022-2025. However, labels are sometimes controlled when taking samples. In 2023 the use of feed additives and premixtures was a selected area for official control. During these inspections, spot checks were carried out to ensure that the additives used in feed mixtures were correctly labelled.

31. 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 many of establishments visited by the audit team, labelling discrepancies were observed such as:

    - Labels, including the approval number, were partially illegible at one feed business operator due to a printer problem. This is not in accordance with Article 14(1) of Regulation (EC) No 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 No 767/2009.
    - A label indicated the presence of a feed additive using the number "4a102i." However, no feed additive is listed in the European Union Register of Feed Additives which corresponds to this number.
    - In one compound feed producer, the approval number on a label reviewed by the audit team, corresponded to the feed business operator being visited. However, the label also listed fishmeal in the composition and the feed business operator being visited was not authorised to use fishmeal. Based on an internal traceability number,

[1] In their response to the draft report the Competent Authority confirmed the feed business operator now has a written procedure

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the feed business operator confirmed the compound feed had been produced in a different feed mill. This is not in accordance with Article 15(b) of Regulation (EC) No 767/2009. In addition, the label did not include the words “contains fishmeal – shall not be fed to ruminants” in accordance with Annex IV, Chapter IV, Section A, point b of Regulation (EC) No 999/2001.

- At a feed additive / premixture manufacturer, the label for a complete milk replacer listed levels of vitamin A and vitamin D3 at 100 times or more the maximum permitted levels allowed in their authorization acts – Regulation (EU) No 2015/724 (vitamin A) and Regulation (EU) No 2019/849 (vitamin D3). In addition, the label on a turkey pre-mixture indicated an inclusion rate of 1% but did not indicate the age of turkeys the premixture was intended for. If fed to turkeys older than 28 days, the maximum permitted level would be exceeded.

None of these discrepancies were identified during recent official controls.

32. The competent authority confirmed no internal audit had been conducted related to feed in the previous five to six years.

Conclusions

33. Procedures are in place for the planning and delivery of official controls in approved feed establishments. Inspections are carried out as planned but the effectiveness of these controls is weakened due to non-compliances related to e.g. traceability, retained samples, cross contamination, labelling and infrastructure requirements not being detected and acted on by the competent authority. This results in significant non-compliances going undetected by the competent authority which may lead to non-compliant feed being placed on the market

34. The feed aspect in food establishments supplying by-products to the feed chain is currently not well regulated with negligible official controls performed resulting in non-compliances going undetected by the competent authority.

5.1.4 Sampling and analysis

Legal requirements

Points 3, 5.1, 5.2, 9 and 10 of Annex I of Regulation (EC) No 152/2009

Findings

5.1.4.1 *Planning of official sampling*

35. According to the pre-audit document, the NFSA have annual monitoring programmes for feed for terrestrial and aquaculture animals. The NFSA headquarters plan the programme which includes information on the type of analyte and number of samples to be taken. This programme is then sent to inspectors in the regions to collect the samples (this is the arrangement up to and including 2025). During the audit, the competent authorities confirmed that the number of samples and analytes is largely determined by budget. The planning of analytes to be measured in feed for terrestrial animals is based on, inter alia, results from previous years monitoring programmes, input from the Norwegian Veterinary Institute (NVI) and contact with Nordic-Baltic countries and EU member states. The audit team saw evidence of input from NVI to NFSA regarding the 2025 official sampling plan.

36. Analyses relating to all sections but one of undesirable substances listed in Annex I of Directive 2002/32/EC are included into the sampling plan. Analyses relating to Section VI (harmful botanical impurities) are not included into the plan. This is despite an NFSA

monitoring plan on imported feed materials carried out between 2017 to 2019 confirming the presence of these harmful botanical impurities.

37. According to the pre-audit document, NFSA have prepared guidance for official sampling of feed *"Instruks for prøvetaking av fôrvarer"*. This document explains the requirements of Regulation (EC) No 152/2009 on the methods of sampling and analysis for the official control of feed.

5.1.4.2 *Implementation of official sampling*

38. The audit team observed sampling in two compound feed manufacturers visited and proposed the feed type and substance for the sampling exercises. The inspectors used appropriate apparatus for the sampling of solid feed and for the preparation of reduced samples in a representative way.

39. 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) No 152/2009.

40. Data provided for terrestrial animals between 2022 to 2024 confirmed the number of planned samples were, with only a few exceptions, taken.

5.1.4.3 *Testing of official feed samples*

41. The laboratory network for official feed samples consists of laboratories located in Norway and other EU Member States. The designations for official laboratories located in Norway are in line with the requirements laid down in Article 37 of Regulation (EU) No 2017/625. However, several of the Norwegian laboratories subcontract analysis to laboratories located in other EEA member states and these are not designated in writing by the Norwegian competent authorities in accordance with Article 37 of Regulation (EU) No 2017/625.

42. NFSA confirmed there are currently no official laboratories designated for harmful botanical impurities in feed (Section VI of Annex I to Directive 2002/32/EC).

43. The methods of laboratory analysis used for the purpose of official controls were included in their respective scopes of accreditation to EN ISO/IEC 17025. Thus, the requirements laid down in Article 37(5)(a) of Regulation (EU) No 2017/625 were met for these laboratories.

44. The system for auditing the official laboratories defers to accreditation body audits as allowed under Article 39 of Regulation (EU) No 2017/625.

45. In the visited laboratory, validation documentation for two analytical methods were examined by the audit team and are in line with the requirements laid down in Article 34(4) of Regulation (EU) No 2017/625. There were a variety of internal quality control measures and control charts which allowed for adequate performance monitoring. This was underpinned by the laboratory's successful participation in a variety of relevant proficiency testing schemes for feed.

46. The audit team reviewed a number of analytical tests (with related raw data) and reports related to the determination of undesirable substances within the meaning of Directive 2002/32/EC and authorized feed additives, checked the acceptance/rejection system for incoming samples and saw that these covered checks of the accompanying documentation, the sample quantity received, sample seals and sample condition. This is in line with the requirements laid down in Article 34(5) of Regulation (EU) No 2017/625. The moisture content had been determined, however, the audit team noted, that the recovery rates for feed samples were not always reported in line with part C.7. of Annex II to Regulation (EU) No 152/2009 and that the number of determinations were not always performed in line with C.3. of Annex II to Regulation (EU) No 152/2009.

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Conclusions

47. The laboratory network for analysis of official feed samples consists of laboratories located in Norway and other EU Member States. These laboratories generally meet the requirements of official laboratories with the exception that laboratories in other member states are not designated by the Norwegian competent authorities. This may affect the legal validity of the official feed sample analysis results.

5.1.5 Actions taken on non-compliances

48. Guidance is available for NFSA staff on follow-up of non-compliances. According to the pre-audit document, the guidance aims to ensure the correct, efficient and consistent use of available enforcement tools across all supervisory areas of the NFSA.

49. The audit team reviewed recent enforcement actions where non-compliances had been detected during inspections. The enforcement actions included:

- A case concerning a Decision on HACCP which began in January 2024. The feed business operator appealed the Decision in July 2024 and the local NFSA office followed procedure by forwarding the appeal to their Central Complaints Unit in July 2024. At the time of the audit, there had been no further progress.
- A Decision relating to several non-compliances (requirement for update of HACCP, calibration of scales…) The Notification of Decision was issued on 10 June 2024 and the feed business operator sent satisfactory corrective actions on 14 October 2024. The feed business operator was not informed that the Decision was closed as required by NFSA guidance.
- A Decision to update HACCP was issued and satisfactory corrective actions were received. NFSA subsequently informed the feed business operator that the corrective actions were satisfactory, and the case had been closed.

Conclusions

50. The competent authority takes actions when non-compliances are identified during official controls. Notwithstanding, the consistency and efficiency of such controls are not always ensured which reduces their effectiveness.

6 Overall conclusion

The audit team found procedures are in place for the planning and delivery of official feed controls in approved feed establishments which are supported by documented control procedures. Inspections and sampling are carried out as planned but the effectiveness of these controls is weakened due a range of non-compliances being undetected and consequently not acted on by the competent authority e.g. traceability, cross-contamination, retained samples, and infrastructure requirements. These significant non-compliances increase the likelihood that non-compliant feed is placed on the market.

In addition, the feed aspect of food establishments supplying by-products to the feed industry is not well regulated with negligible official controls performed and non-compliances going undetected.

The official controls by the competent authority on feed business operators which produce both compound feed for ruminants and compound feed for non-ruminant farmed animals which contains fish meal are weak and do not ensure feed business operators comply with regulatory requirements. Specifically, the official controls do not ensure that compound

feed for ruminants and compound feed for non-ruminants which contains fish meal are produced and stored in physically separate locations. According to the most recent EFSA opinion[2], even with low risk, the law requires that feed safety is assured, so strict separation of fishmeal and ruminant feedstuff is necessary.

Staff perform official sampling of feed in a satisfactory manner. The laboratory network for analysis of official feed samples consists of laboratories located in Norway and other EU Member States. These laboratories generally meet the requirements of official laboratories with the exception that laboratories in other member states are not designated by the Norwegian competent authorities.

7 Final meeting

A closing meeting was held with the central competent authorities on 15 October 2025 when the audit team presented the main findings and preliminary conclusions. During this meeting, the central competent authorities did not express any disagreement with the findings and preliminary conclusions and accepted some of the non-compliances observed by the audit team were serious.

8 Recommendations

In order to facilitate the follow-up of the recommendations hereunder, Norway should notify the Authority no later than 18 February 2026 of additional corrective actions planned or already taken other than those already indicated in the reply to the draft report of the Authority. In case no additional corrective actions have been planned, the Authority should be informed of this. The Authority should be kept continuously informed of such changes made to the already notified corrective actions and measures, including changes to the deadlines indicated for completion and also the completion of the measures included in the timetable.

No	Recommendation
1	NFSA 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: 33. Associated finding: 19.
2	NFSA should ensure they designate sub-contracted feed testing laboratories in other member states as official laboratories. Legal basis: Articles 37(2)(3) and 39 of Regulation (EU) No 2017/625. Recommendation based on conclusion: 47.

[2] https://www.efsa.europa.eu/en/efsajournal/pub/443

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	Associated finding: 41.
3	NFSA 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) No 2017/625. Recommendation based on conclusion: 34. Associated finding: 16, 17, 18 and 31.
4	NFSA should ensure that official controls consistently verify that feed business operators meet the requirements for appropriate checks of the effectiveness of measures they have taken to minimise cross-contamination Legal basis: Point 3 of the section "Production" of Annex II to Regulation (EC) No 183/2005. Recommendation based on conclusion: 33. Associated finding: 26.
5	NFSA 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) No 2017/625. Recommendation based on conclusion: 33. Associated finding: 31.
6	NFSA should ensure that feed mills authorised for incorporating fishmeal in non-ruminant feed and producing ruminant feed, do so in physically separate facilities for such activities. Legal basis: Annex IV Point 2(B)(c)(ii) of Regulation (EC) No 999/2001. Recommendation based on conclusion: 33. Associated finding: 28 and 29.

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

CV	Coefficient of variation (in relation to feed, it is a measure of the homogeneity of a feed mixture)
ESA	EFTA Surveillance Authority
EEA	European Economic Area
EEA Agreement	Agreement on the European Economic Area
EFSA	European Food Safety Authority
EU	European Union
HACCP	Hazard analysis and critical control points
MANCP	Single integrated multi annual national control plan
MATS	NFSA's case processing and decision support tool
NVI	Norwegian Veterinary Institute

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) 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, 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 - Norway's comments to the draft report

Actions already taken

28.

(….) The feed business operator confirmed they clean the loading equipment once per week (they had no written procedure) and test ruminant feed for detection of fishmeal twice per month by microscopy.

Comment: The feed business operator now has a written procedure.

See attachment: "Rutine for rengjøring…"

31.

Bullet point 5:

The premixture manufacturer has sent documentation that the declaration was wrong. The content of the product is correct.

Attached you can see how it is calculated. The concentrate that constitutes 50% contains 50,000 IU A vit/kg and then gives 25,000 IU/kg of finished milk powder Furthermore, the concentrate contains 9,000 IU D3 vit/kg. With 50% mixing it becomes 4,500 IU D3 / kg.

The content of the product is correct, but the declaration was incorrect. The declaration of the concentrate contained 1000 times too much because the unit is 1000 IU.

See attached two documents that prove that the calculation is correct:

2540097 Attåt melkebart...

202012...

Comments to the factual content of the draft report:

5.1.3.2 Implementation of inspections

18. (….) In one of the HACCP plans, it took approximately six months for HACCP documentation to be updated following an incident involving the inclusion of excessive vitamin D in a compound feed.

Correction/comment: The HACCP plan for premixes was updated in March, approximately 2 months after the incident. We propose of this reason to replace 6 months with 2 months.

31. A label indicated the presence of a feed additive using the number "4a102i." However, no feed additive is listed in the European Union Register of Feed Additives which corresponds to this number.

Bullet point 3:

Comment: We have not seen the documentation for this observation. We don't know which establishment this label belongs to. Can you send us the picture you took so we can check this?

Annex 4 - Norway's action plan for corrective measures

Recommendation 1

NFSA should make sure that official controls ensure that feed business operators comply with legislative requirements concerning the appropriateness of retained samples

Title	Description	Updates	Due date	Status
Sample sealing and storage: Communication, inspection and industry awareness	Routines and requirements for sealing and storage of reference samples must be communicated to the industry and included in the Norwegian Food Safety Authority's inspection plans. In addition, information about the requirements will be prepared and published on the Authority's website. This information can be made available during 2026. In 2027, this will become a dedicated inspection topic in corporate and chain audits, where verification inspections will be carried out with thorough follow-up. Information about the inspection topic for 2027 will also be published in advance so that everyone is familiar with the regulations and our follow-up of them.		1.1.2027	2. Processing

Recommendation 2

NFSA should ensure they designate sub-contracted feed testing laboratories in other member states as official laboratories.

Title	Description	Updates	Due date	Status
Internal and External Communication	Ensure clear communication within the OK-KI group and in dialogue with laboratories, that all laboratories – including subcontractors – must be designated as official laboratories by NFSA , in addition to being designated by the CA in the country were subcontractor is located. This is specified in the Commission Notice on the implantation of the Regulation (EU) 2017/625 of the European Parliament and of the Council - Official Controls Regulation (2022/C 467/02), chapter 2.2.3.4.	This was discussed with the OK coordinators at the KI-OK group meeting on 27 November 2025.	30.1.2026	2. Processing
Contract and Tender Requirements	Include as a mandatory condition in OK contracts and tender documents that laboratories used as subcontractors in other countries must be designated as official laboratories by the CA in the country where they are located. Tender documents must require laboratories to provide: - Designation letter(s) for the subcontractor(s) - Valid accreditation certificate(s)	This requirement was submitted to the procurement section on 27 November for inclusion in new contracts	30.1.2026	2. Processing
Designation of SGS Analytics GmbH, Jena, Germany	The designation has been completed, and a formal request has been sent to the German authorities to designate the laboratory for the relevant scope.		30.1.2026	2. Processing

Recommendation 3

NFSA should ensure that a system is in place for the implementation of official controls in food establishments supplying by-products to the feed chain.

Title	Description	Updates	Due date	Status
Feed chain risk mapping and Inspection Initiative	To gain an overview of the overall risk associated with foodstuffs ending up in the feed chain, we must map the scope. This must be done in collaboration with the Food Division. The department will receive support from IMA and Communications to publish information about the registration requirement, and what it entails, on the NFSA's feed and food web pages. This will be carried out during 2026. Information about the requirements will also be sent directly to corporate-level management in the relevant businesses in 2026. The department will ask the Food Division to include a requirement point concerning foodstuffs that go to feed (2027?). During 2027, the department will have a clearer picture of the scope of foodstuffs going to feed. This will enable us to conduct a risk assessment so that in 2028 we can carry out inspections of selected businesses that receive foodstuffs for feed.		31.12.2027	2. Processing

Recommendation 4

NFSA should ensure that official controls consistently verify that feed business operators meet the requirements for appropriate checks of the effectiveness of measures they have taken to minimise cross-contamination

Title	Description	Updates	Due date	Status
Specific decision on coccidiostats	The business that did not follow its own routines for the use of coccidiostats has received a decision stating that they cannot use coccidiostats until they can document compliance with their own routines. This documentation will be in the form of physical supervision, digital supervision, or a good description of corrective measures from the company's side.		31.3.2026	2. Processing
Overview, targeted inspections, updated requirement points and multi-year planning	The department must establish a clear overview of who uses coccidiostats, fishmeal, and PAP. Relevant businesses are to be identified in MATS. In addition, questionnaires will be sent to corporations and chains, as well as businesses not part of a corporation, by the end of the first third of 2026. Inspections of relevant businesses (initially those producing feed mixtures for terrestrial animals) will be carried out by the end of 2026. In addition to cross-contamination, inspections must to a greater extent uncover other deviations identified in the ESA audit (such as homogeneity and traceability). Therefore, fewer requirement points will be included in each verification inspection, allowing sufficient time to thoroughly investigate the issues under review. Multi-year plans known to all will also provide assurance regarding which matters are planned to be examined at least three years ahead.		31.12.2026	2. Processing

Recommendation 5

NFSA should have procedures and / or arrangements in place to ensure the effectiveness of official controls in relation to labelling.

Title	Description	Updates	Due date	Status
Information and inspections on labeling and traceability	By the end of the first third of 2027, an online announcement will be published with information highlighting the inspections for 2027 on correct labeling and satisfactory traceability. At the same time, the Norwegian Food Safety Authority must ensure that the online information about labeling and traceability in the feed sector is understandable and accurate. During the second or third third of 2027, supervision will be carried out in which documentation on labeling will be collected from a selection of producers and thoroughly assessed (digital inspection). Labeling and traceability will also be topics in corporate and chain inspections in 2027.		31.12.2027	2. Processing
	Priority areas for this work are: feed for terrestrial animals, fish feed, and pet feed.			

Recommendation 6

NFSA should ensure that feed mills authorised for incorporating fishmeal in non-ruminant feed and producing ruminant feed, do so in physically separate facilities for such activities.

Title	Description	Updates	Due date	Status
Specific follow-up on FBO producing ruminant feed and animal protein on the same line	The business that previously produced ruminant feed on the same production line as animal protein has received a decision that this must cease. The follow-up of the decision will be carried out with an inspection in the first third of 2026.		1.5.2026	2. Processing
Specific follow-up on FBO unloading ruminant feed and fishmeal in the same area	At the company where unloading of ruminant feed and fishmeal in the same area was uncovered, the department will follow up to ensure that cleaning routines and possible measures to prevent cross-contamination after the day's production are implemented in the first tertial of 2026. At the same time, a decision will be made requiring the company to prepare a concrete action plan to ensure that production complies with the regulations.		1.5.2026	2. Processing
Overview and guidance on use of fishmeal	The guideline addressing this topic will be updated by the end of the first third of 2026. The department will also compile an overview of who uses fishmeal and how it is used by the end of the first third of 2026. A questionnaire will also be sent out to verify that the information we have is correct. At the same time, updated guidance on applicable requirements will be published on our website.		1.5.2026	2. Processing
Audits and verification inspections on use of fishmeal	The use of fishmeal in the feed industry will be subject to audits at corporate and chain level. Verification inspections will take place during 2026 after an assessment of where the risk of non-compliance is greatest.		6.12.2025	2. Processing