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Final report
EFTA Surveillance Authority's audit to
Iceland
from 4 to 13 October 2021
on animal welfare at the time of killing

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 in Iceland from 4 to 13 October 2021 on animal welfare at the time of killing.

The main objective of the audit was to evaluate the assurances given by official controls regarding the business operators' compliance with applicable EEA legislative requirements and to evaluate whether official controls on animal welfare at the time of killing are effective in ensuring that animals are spared any avoidable pain, distress, or suffering during their killing and related operations.

The audit team found that several improvements in the performance of the official controls to ensure better compliance with the relevant EEA provisions had been made since the previous audit carried out by the Authority on the same topic in 2014. However, certain issues need to be further addressed. These include:

- *risk based planning for official controls on animal welfare;*
- *examination of business operators' own control systems;*
- *training of staff involved in official controls;*

- *amending of the Multi-annual national control programme to include of provisions on animal welfare at the time of killing;*
- *credibility of the certificates of competence issued to business operator staff;*
- *verification of compliance with requirements of Regulation (EC) No 1099/2009 and in particular regarding obligations of business operators.*

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 4 to 13 October 2021. The audit team comprised two auditors from the EFTA Surveillance Authority ('the Authority').

A pre-audit questionnaire was sent by the Authority to the Icelandic Ministry of Industries and Innovation ('the Moll') on 29 July 2021. A reply ('the pre-audit document') was provided on 17 September 2021.

The opening meeting was held with representatives of both the Icelandic Food and Veterinary Authority ('MAST') and the Moll on 4 October 2021 at MAST's office in Hafnarfjörður. At the meeting, the audit team confirmed the objectives and the itinerary of the audit and the Icelandic representatives provided additional information to that set out in the pre-audit document.

Throughout the audit, a representative of MAST accompanied the audit team.

A final meeting was held at MAST's office in Hafnarfjörður on 13 October 2021, 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 Scope and Objective of the audit

The main objective of the audit is to evaluate the effectiveness of official controls on business operators ('BOs') to ensure that animals are spared any avoidable pain, distress, or suffering during their killing and related operations. In particular:

- to evaluate the assurances given by official controls regarding business operators' compliance with applicable requirements of Regulation (EC) No 1099/2009; and
- to evaluate whether official controls on animal welfare at the time of killing, carried out in accordance with Regulation (EU) No 2017/625 of the European Parliament and of the Council, are suitable to ensure the effective implementation of Regulation (EC) No 1099/2009; and
- to evaluate compliance of Iceland and its competent authorities with specific requirements of Regulation (EC) No 1099/2009, such as guides to good practice, scientific support, certificates of competence and the effectiveness of the implementation of those requirements.

The scope of this audit included:

- main farmed species (poultry, porcine, bovine, ovine, caprine and equine);
- large and small throughput slaughterhouses;
- all operations, facilities and equipment related to slaughtering;
- BOs' systems for ensuring compliance with Regulation (EC) No 1099/2009 requirements; and
- official controls at central and district level, including verification and audits.

Regulation (EC) No 1099/2009 provided for a transition period for some requirements related to lairage facilities and stunning equipment that ended on 8 December 2019. The audit provided an opportunity to check how competent authorities implemented the requirements under this transition and their approach to official controls thereof.

The assessment was carried out based on, and related to, the EEA legislation referred to in Annex 2 to this report. The assessment was further based on the pre-audit document.

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

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

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

	Number	Comments
Competent authorities	6	An initial and a final meeting between the audit team and MAST in Hafnarfjörður. Additional meeting with MAST was held to seek further clarification on the system of official controls. Meetings in three MAST District Veterinary offices to discuss the official controls at District level.
Pig slaughterhouses	2	One using gas stunning and the other using electrical stunning of pigs.
Sheep slaughterhouse	1	Seasonal sheep slaughterhouse using electrical stunning.
Cattle slaughterhouses	2	Both using captive bolt stunning
Poultry slaughterhouse	1	Using electrical water bath stunning

3 Legal basis for the audit

The legal basis for the audit was:

- a) Point 4 of the Introductory Part of Chapter I of Annex I to the EEA Agreement;
- b) Article 1(e) of Protocol 1 to the Agreement between the EFTA States on the Establishment of a Surveillance Authority and a Court of Justice (Surveillance and Court Agreement);
- c) Regulation (EC) No 1099/2009 on the protection of animals at the time of killing;
- d) Article 116 of 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, as adapted to the EEA Agreement by the sectoral adaptations referred to in Annex I to that Agreement.

Legislation relevant to this audit is listed in Annex 2.

4 Background - Previous audits

The audit was a part of the Authority's control programme.

The Authority last carried out an audit regarding the application of EEA legislation related to animal welfare at the time of killing in Iceland in 2014 ('the 2014 audit'). The present audit has allowed the Authority to assess the implementation of corrective actions following 2014 report. The final report from the 2014 audit can be found on the Authority's website (www.eftasurv.int).

5 Findings and conclusions

5.1 Official controls

5.1.1 Framework for controls

Legal Requirements

Articles 4(1) and (2), 5(4), 14(a), and 110 of Regulation (EU) No 2017/625

Articles 6(4), 14(1), 15(1), 21, 28 and 29 and Annex II of Regulation (EC) No 1099/2009

Article 13 and Annex II of Regulation (EU) 2019/624

Findings

1. The Moll is the responsible Ministry for transposition of EEA legislation concerning issues related to animal welfare. It is responsible for implementation and application of regulations based on IS Act No 55/2013 on animal welfare. Regulation (EC) No 1099/2009 is implemented in national legislation by Regulation IS No 911/2012, based on IS Act No 55/2013.
2. Chapter X of IS Act No 55/2013 lays down rules on penalties applicable for infringements of Regulation (EC) No 1099/2009. MAST is responsible for the enforcement of both IS Act No 55/2013 and Regulation IS No 911/2012.
3. According to the transitional provision laid down in Article 29(1) of Regulation (EC) No 1099/2009, subject to Article 28(1) of the same Regulation, requirements

of Directive 93/119/EC on protection of animals at the time of slaughter and killing concerning layout, construction and equipment of slaughterhouses continued to apply until 8 December 2019 ('the transitional deadline') in the case of establishments that were operating before 1 January 2013. Due to the fact that Directive 93/119/EC was not applicable in Iceland, however, certain additional requirements listed in IS Act No 911/2012 instead applied until the transitional deadline 8 December 2019, including requirements for stunning equipment and for lairages. These additional requirements provided for certain conditions of Annex II of Regulation (EC) No 1099/2009 to be implemented in Iceland before the transitional deadline.

4. According to information provided by Iceland in response to the pre-audit document, stricter national rules than required by Regulation (EC) No 1099/2009, have been adopted in Iceland since Article 21 of IS Act No 55/2013 requires that animals shall be stunned without exception when killed. This requirement includes animals which are subject to particular methods of slaughter prescribed by religious rites, for which Article 4(4) of Regulation (EC) No 1099/2009 provide an exemption regarding stunning before being killed.
5. MAST has issued several guidance notes and check lists to help staff perform official controls of animal welfare requirements at slaughter and during related procedures. These include inspection manuals for slaughter of red meat animals and poultry and check lists for routine daily checks in slaughterhouses. The audit team noted that the system of official controls described in the manuals does not include the examination of controls that operators have put in place, as required by Article 14(a) of Regulation (EU) No 2017/625.
6. Inspection manuals include guidance for MAST staff on how to perform animal welfare checks at slaughter and related operations, including a decision tree on enforcement action to be taken when certain non-compliances are detected. The audit team noted that the inspection manual for poultry only lists irregularities related to handling of birds before stunning and checking of birds after scalding as serious non-compliances. Under the inspection manual, non-compliances related to stunning and bleeding are not regarded as serious non-compliances. A similar finding was detected during MAST's internal audit in 2016 concerning the instruction manual for red meat animals. In the case of the instruction manual for red meat animals, this was consequently corrected by classifying all non-compliances which might cause unnecessary suffering to animals as serious non-compliances.
7. Certain requirements in the inspection manuals go beyond the legal requirements of Regulation (EC) No 1099/2009, such as defining stocking densities for birds transported in crates. However, certain omissions were noted by the audit team in these documents, such as the absence of specific requirements for audio and visual alarms if the duration of exposure to key stunning parameters falls below the required level and the absence of equipment to record these key parameters, as required by Article 14 and Points 4.1. and 6.2. of Annex II of Regulation (EC) 1099/2009.
8. Additionally, the inspection manual for poultry states that only one carotid artery requires to be cut for bleeding. This is contrary to Article 15 and Point 3.2. of Annex III of Regulation (EC) 1099/2009 which requires both carotid arteries or the vessels from which they arise to be systematically severed.

9. Daily controls in slaughterhouses, which includes the protection of animals, are carried out by an official veterinarian ('OV'), using MAST's checklist GAT—021.3.0 BIs for poultry and GAT-019.4.0 BIs for other species. These controls include checks in lairages, checks of effective stunning and other parameters needed to ensure welfare of animals. The check list also includes a requirement to verify own checks of effective stunning and sticking undertaken by each BO. In one district visited, these controls were carried out on a weekly basis. In two other districts visited, however, the controls were not routinely performed. In one district, the OV confirmed that standard operating procedures ('SOPs') are checked only if the OV detects an irregularity during daily checks. In a second district, the OV confirmed that the BO did not make a SOP available on request, contrary to Article 6(4) of Regulation (EC) 1099/2009, when a non-compliance was detected by the OV during an official control.
10. In addition to daily checks, regular checks, based on risk assessment, are performed in slaughterhouses by staff belonging to MAST's food controls team. A representative of that team explained that assessment of welfare at slaughter needs to be undertaken, in the course of these regular checks, at least once a year. The audit team saw evidence that these checks were performed in all slaughterhouses visited.
11. MAST staff met were generally knowledgeable about the requirements related to animal welfare at slaughter and related operations. Staff were offered different training possibilities, including participation in Better Training for Safer Food ('BTSF') courses and attending the e-learning BTSF courses. Some OVs mentioned that they had also participated in on-line courses organised for BOs staff for the purpose of such staff receiving a certificate of competence. However, not all OVs in the slaughterhouses had been trained and kept up to date in their area of competence, as required by Article 5(4) of Regulation (EU) 2017/625. MAST confirmed that they had not yet fully implemented specific training requirements for its staff as defined in Article 13 and Annex II of Regulation (EU) No 2019/624. Lack of adequate training, as required by Points 3.(s), 5. and 6. of Chapter I of Annex II of Regulation (EU) 2019/624, contributed to the fact that some non-compliances had not been detected by the OVs (see points 31, 59). The Authority's report from the 2014 audit had previously recommended that training of OVs in slaughterhouses needed to be strengthened.
12. The Multi-annual national control plan ('MANCP') for the period from 2017 to 2020 does not include information on official controls of animal welfare at slaughter or during related operations, as required by Article 110 of Regulation (EC) 2017/625. Furthermore, annual MANCP reports covering the same period provide no information related to animal welfare at slaughter and no evaluation of the effectiveness of official controls on animal welfare in slaughterhouses is done, as required by Article 113 of Regulation (EC) 2017/625. MAST explained that information on official controls concerning animal health and animal welfare were mostly omitted in the current version of MANCP due to a lack of resources and that the MANCP has not been amended and republished since 2017. MAST explained that, according to its new strategy and organisation chart applying from 1 October 2021, more resources will be dedicated to preparation of the MANCP. The Authority report from the 2014 audit previously recommended that a MANCP be prepared.
13. The national audit programme includes internal audits of official controls of BOs' compliance with requirements concerning animal welfare during slaughter. The last audit on this topic was carried out in 2016 and nine recommendations were issued, mostly concerning written documentation used in slaughterhouses and follow-up of

any non-compliances detected. MAST confirmed that all recommendations from this internal audit had been followed up and closed.

14. MAST confirmed that no mobile slaughterhouses are approved for use in Iceland.

5.1.2 *Scientific support and guides to good practice*

Legal Requirements

Articles 13 and 20 of Regulation (EC) No 1099/2009

Findings

15. In the reply to the pre-audit document, the audit team was informed that MAST uses guidelines issued by the European Food Safety Authority ('EFSA') and that they have on a few occasions requested scientific support from other EEA states and members of the Network of the Scientific National Contact Points under Article 20(2) of Regulation (EC) 1099/2009.

16. In the reply to the pre-audit document, the audit team was informed that no 'Guide to Good Practice on the protection of animals at the time of killing in slaughterhouses' was developed by BOs as provided by Article 13(2) of Regulation (EC) No 1099/2009, nor has the competent authority developed and published its own guides to good practice as permitted by Article 13(4) of the same Regulation. However, it has been noted that MAST had distributed several guides and instructions from other EEA states and EFSA to its staff in slaughterhouses and to BOs, accompanied by a disclaimer that they need to be adapted to specific Icelandic legal requirements. The aim was to use these guides as training material.

17. In addition, the audit team noted that a guide to protection of sheep during transport had been developed by MAST and is available on the MAST website. This guidance include good practices on unloading and handling of sheep at a slaughterhouse.

5.1.3 *Provision of certificates of competence*

Legal Requirements

Articles 7 and 21 of Regulation (EC) No 1099/2009

Findings

18. MAST is the competent authority responsible for the tasks specified in Article 21(1) of Regulation (EC) No 1099/2009

19. Iceland does not recognise qualifications obtained for purposes other than those stated in Articles 7 of Regulation (EC) N0 1099/2009 as equivalent to certificates of competence referred to in Article 21 of that Regulation. However, Iceland is accepting certificates of competence issued by EU member states, pursuant to Article 21(4) of Regulation (EC) No 1099/2009.

20. MAST confirmed that the organisation of training referred to in Article 21 of Regulation (EC) No 1099/2009 has not been delegated to any other body or entity as permitted by Article 21(2). MAST does, however, have an agreement with a

Norwegian non-governmental organisation ('NGO') to use their e-learning course materials for the theoretical part of the training and in organising the theoretical exam on which basis certificates of competence are delivered.

21. Practical evaluation of this training is always carried out by an OV working at MAST. The Senior Veterinary Officer for Meat Inspection is responsible for issuing certificates of competence and for the practical arrangements of the e-learning course, including registration of the attendees and monitoring performance in final exams.
22. The audit team was informed that the e-learning course is not generally available in the Icelandic language. Although MAST arranges for translation into Icelandic of written materials from the course provided by the NGO, the exam following the e-learning course is only available in English and Norwegian. One BO explained that, for their staff who do not speak English, the exams are sat in a group with BO's Quality Manager acting as a translator. In these circumstances, it is not ensured that answers are provided individually by each person taking the exam, which is not consistent with the requirement at Article 21(1)(b) of Regulation (EC) No 1099/2009 that the certificate of competence is delivered to a person after passing an independent final examination. The audit team was informed that this arrangement has only recently been put in place; previously, the exams were supervised by MAST staff.
23. BO staff involved in slaughter of animals and related operations held valid certificates of competence in most of the slaughterhouses visited by the audit team. However, in one slaughterhouse, the Quality Manager who monitors the effectiveness of stunning on behalf of the BO had no certificate of competence. The audit team noted that the Animal Welfare Officer ('AWO') for this BO, who was in possession of the certificate of competence, did not in fact monitor effectiveness of stunning. This is contrary to the requirement of Article 7(2)(d) of Regulation (EC) No 1099/2009 that BOs shall ensure that only persons holding a valid certificate of competence carry out specific slaughter operations, including the assessment of effective stunning.
24. The audit team visited another slaughterhouse performing seasonal slaughter of sheep (from September to October). The BO explained that due to the high turnover of staff it is not always possible to ensure that certificates of competence are obtained in a timely manner. The audit team noted that one staff member was working in the lairage with a temporary certificate as provided for in Article 21(5) of Regulation (EC) No 1099/2009. However, the audit team also noted that the same person had previously worked in the lairage during the 2020 slaughter season without a certificate of competence. Again, this is contrary to the requirement in Article 7(2)(a) of Regulation (EC) No 1099/2009 that BOs shall ensure that only persons holding a valid certificate of competence carry out specific slaughter operations, including the handling and care of animals before they are restrained.
25. In the same slaughterhouse, three members of staff obtained certificates of competence in the week prior to this audit. No temporary certificates were issued for these staff before that, meaning they too were working without a certificate of competence for almost two months.
26. A welfare related incident was detected by the OV in 2020 in a slaughterhouse, where an operative, without a certificate of competence, inhumanely treated animals in lairage (evidence found during post-mortem examination of number of pigs having been beaten with a stick). A non-compliance report was written by the

OV and brought to the attention of the District Veterinary Officer who initiated an enforcement procedure, which was still ongoing during the audit.

5.1.4 *Planning of controls*

Legal Requirements

Articles 9, 10 of Regulation (EU) No 2017/625

Articles 3(1) and (2), 4, 5(2)(c)(iv) and (3)(b), 7, 8(a), 13, 14 and Point 3. (a) to (s) of Chapter I and Point 5. of Chapter II of Annex II of Regulation (EU) No 2019/624

Findings

27. At the time of the audit, there were 13 red meat (mostly multispecies) and three poultry slaughterhouses operational in Iceland. Four red meat and two poultry slaughterhouses were visited during the audit.

28. According to information provided by Iceland, MAST has implemented a risk classification system for official controls of BOs which is generally based on production levels and historical BO compliance records. The audit team noted that the general risk classification system does not take into account identified risks associated with animal welfare at the time of killing and during related operations. In the Authority's report of the 2014 audit, it was noted that MAST had stated that the risk classification system regarding animal welfare in slaughterhouses, designed to form the basis for appropriate control frequency, was in preparation. A request to ensure that official controls are carried out on a risk basis taking into account identified risks associated with animals, pursuant to Article 9(1) of Regulation (EC) 2017/625, was also the subject of a recommendation in the report of the 2014 audit. At the time of this audit, however, such risks are still not taken into account in performing official controls on a risk basis.

5.1.5 *Controls on business operators' obligations*

Legal Requirements

Articles 5(1)(h), 12(1), 13, 14(a), 15(1), (2) 18(1), (2), 137 and 138 of Regulation (EU) No 2017/625

Articles 4, 5, 6, 8, 14, 15, 16 and 17 and Annexes I, II and III of Regulation (EC) No 1099/2009

Findings

29. The audit team visited six slaughterhouses and reviewed several BO's SOPs relating to the protection of animals at the time of killing.

30. The audit team noted that MAST's inspection manuals do not include the requirement to examine BOs' own controls, as required by Article 14(a) of Regulation (EU) No 2017/625, and the OVs were in general not aware of the content of the BOs' SOPs concerning killing and related procedures. As a result they were not always able to verify compliance with BO obligations under Articles 4, 5, 6, 15, 16 and Annexes I, II and III of Regulation (EC) No 1099/2009. Some OVs

explained that they would refer to the BOs' SOPs only if they found non-compliances during their own daily checks.

31. The audit team noted that SOPs did not cover all the relevant requirements of Regulation (EC) 1099/2009. This was not detected by official controls performed in these establishments and, as a result, no related enforcement action had been taken by the OVs.

Shortcomings in SOPs included:

- Incorrect description of the positioning of the captive bolt to ensure effective stunning, without taking into account manufacturers' recommendation, contrary to Article 6(2)(a) and (b) of Regulation (EC) 1099/2009;
- Lack of checks to ensure that animals do not present any signs of consciousness or sensibility in the period between the end of the stunning process and death, as required by Article 5(1) of Regulation (EC) 1099/2009;
- Lack of checks to ensure that no further dressing is performed until the absence of signs of life of the animals has been verified, as required by Article 15 and Point 3.2 of Annex III of Regulation (EC) 1099/2009;
- Lack of requirements for recording stunning parameters for electric and gas stunners and absence of an alarm system in case of non-effective stunning or incorrect gas concentration as required by Article 14 and Points 4.1 and 6.2 of Annex II of Regulation (EC) 1099/2009;
- Lack of indication with visible signs of the date and time of arrival of animals in lairages and the maximum number of animals to be kept, as required by Point 2.3. of Annex III, of Regulation (EC) No 1099/2009.

32. Regular risk based official controls performed by MAST's food control team did not always include the examination of SOPs related to animal welfare. A specific requirement to check BOs' own controls in relation to welfare during regular risk based checks was introduced by MAST in 2020.

33. The audit team reviewed several official inspection reports for the slaughterhouses visited and noted several cases when adequate enforcement measures were taken by the OVs in case of non-compliance, pursuant to Articles 137 and 138 of Regulation (EU) 2017/625. These included cases where:

- severe animal abuse by an unqualified BO member of staff was detected and followed up;
- an OV requested change of the SOP regarding adequate back-up stunning equipment where the SOP was deficient on this point and the SOP was updated;
- an OV requested that food have to be provided to animals not slaughtered within 12 hours of their arrival, which was previously not the case.

34. However, in certain cases the enforcement measures taken by the OVs did not ensure that the operator remedied the non-compliance and prevented further occurrences of such non-compliance, as required by Article 138(1)(b) of Regulation

(EU) No 2017/625. In addition, the OVs did not always follow MAST's procedures for enforcement (detailed in Document LBE-173.2.0 Bls.).

Examples of such cases include the following:

- In one slaughterhouse in 2020, the OV issued a non-compliance notice three times over a period of three weeks concerning the absence of establishment of stocking densities for horse pens in the lairage and the requirement to feed animals kept in the lairage for more than 12 hours before slaughter. MAST's procedures for enforcement in case of non-compliance requires that if the same non-compliance is detected a second time then a non-compliance report should be issued and the District Veterinary Officer should be notified. The latter should take action to ensure that the non-compliance is rectified. This procedure was not followed by the OV.
 - In the same slaughterhouse, a member of the MAST's food control team recorded the same non-compliance as described above during three regular risk based checks from March to July 2021. The non-compliance was finally addressed by the BO in September 2021, more than a year after first non-compliance notice issued by the OV.
 - In one slaughterhouse, live birds were left in a stunner after a power break down and were not removed by the BO. The OV requested access to the BO's SOP for removing birds from a slaughter line and from a water bath stunner. Access to the SOPs was denied by the BO, contrary to Article 6(4) of Regulation (EC) 1099/2009. No action was taken by the OV to enforce this requirement.
 - In one slaughterhouse, the OV confirmed that when he asked for the manufacturer's instruction for the water bath stunner to verify if they comply with the requirements of Article 8 Regulation (EC) 1099/2009, the BO refused to make it available to him and no further action was taken by the OV.
35. The audit team noted that there was good co-operation and information exchange between OVs and BOs in certain cases when non-compliances were detected during BOs' own checks. For example, when BOs detected that animals could not be brought to a slaughter line without causing them unnecessary pain and distress, they would routinely inform the OVs in order for them to check the animals and take a decision on further actions. The audit team saw examples where animals which were not fit to walk from a lairage to the slaughter line were killed on the spot in the lairage. The relevant OV was also fully briefed when a vehicle transporting animals to a slaughterhouse broke down, causing increased mortality of animals.

Conclusions

36. MAST has established a solid framework for official controls at the central level. This, together with comprehensive guidance and instructions, facilitates implementation of the relevant official control requirements at operational level. However, the absence of animal welfare criteria in the risk-based planning of official controls, omission of certain requirements and inconsistent training of OVs related to animal welfare at slaughter may lead to situations where not all animal

welfare problems are identified during regular official controls.

37. The MANCP and the annual reports do not include official controls of animal welfare at slaughter. No evaluation of the effectiveness of official controls on animal welfare in slaughterhouses is done by MAST thereby limiting the opportunity to modify the MANCP in this regard in subsequent years.
38. MAST requests scientific support and passes this information on to its staff at operational level.
39. No Guides to Good Practice on the protection of animals at the time of killing in slaughterhouses' have been developed by BOs or MAST. MAST fills this gap, to a certain extent, by providing BOs with guidelines and information from other EEA states and EFSA.
40. The CA have established a training course for personnel involved in killing and related operations and a system for delivery of certificates of competence for BOs' staff. However, their credibility is undermined by the fact that the on-line final exam on which basis certificates of competence are issued is not always done in a way which would guarantee that the staff who passed the exam provided the answers individually. In addition, the lack of certificates of competence for some BO staff cannot ensure that animal welfare requirements are respected.
41. Daily checks by the OVs were performed in accordance with CAs planned arrangements, i.e. at least one daily control. However, OVs were mostly focusing on their own daily checks and did not pay sufficient attention to verification of BOs' own obligations. BOs SOPs were not always complete and did not contain all requirements to safeguard the welfare of animals to ensure that they are spared any avoidable pain, distress, or suffering during their killing and related operations.
42. In some cases of non-compliance, the OVs did not follow MAST's own procedures on enforcement and/or no or delayed actions were taken to remedy the non-compliance.

5.2 Layout, construction, equipment and approval of slaughterhouses

Legal Requirements

Articles 6, 8, 9, 14 and 29 and Annex II of Regulation (EC) No 1099/2009

Article 148 of Regulation (EU) No 2017/625

Findings

43. The audit team noted that no actions had been taken by MAST to inform its staff about the expiry on 8 December 2019 of the transitional period established under Article 29(1) of Regulation (EC) No 1099/2009 for application of the requirements under Article 14 and Annex II of the same Regulation concerning layout and construction of slaughterhouses and the equipment used therein. MAST staff met by the audit team explained that they were not aware of this transitional period, the ending of this transitional period and subsequent implications to the structural changes required, such as audio and visual alarms if the duration of exposure to key stunning parameters falls below the required level and equipment to record

these key parameters. However, they confirmed that they checked most remaining requirements of Annex II of Regulation (EC) No 1099/2009 during official controls.

44. In a reply to the pre-audit document, MAST informed the audit team that no new slaughterhouses were approved during the transitional period. The audit team saw evidence that new equipment was installed during the transitional period in slaughterhouses and refurbishments were made, such as a new water bath stunner and new conveyor belt in a poultry slaughterhouse. However, the new water bath stunner installed in 2014 do not comply with the requirements of Article 14 and Annex II of Regulation (EC) No 1099/2009.

Maintenance of stunning equipment:

45. The audit team noted that MAST does not verify that the instructions for use of restraining and stunning equipment comply with the requirements of Article 8 of Regulation (EC) 1099/2009 or that those instructions are published on manufacturers' websites as required by the same Article.
46. OVs were in general not aware of manufacturers' recommendations which, in the case of stunning, must be taken into account when BOs' draft their SOPs, pursuant to Article 6(2)(a) of Regulation (EC) 1099/2009;
47. Records of maintenance were mostly kept by BOs and made available to the audit team. However, the OVs met confirmed that they do not routinely check the maintenance records. One OV confirmed that they routinely checked the cleanliness and appearance of electrical stunning tongs and would ask for maintenance records only if they detected any problems with this equipment.
48. MAST informed the audit team that the stunning equipment used in Iceland for depopulation of sheep was manufactured in Iceland. This stunning equipment is an air-driven penetrative captive bolt, which is still in use for depopulation organised by MAST. No instruction manual was made available by the manufacturer on its own website and no maintenance records were made available to the audit team for this stunning equipment, contrary to Article 8 of Regulation (EC) 1099/2009.

Conclusions

49. MAST staff are not aware of all relevant requirements of Annex II of Regulation (EC) No 1099/2009 concerning equipment in use in slaughterhouses, consequently these are not consistently implemented. This leads to an increased risk that stunning operations do not ensure that all animals are stunned properly before being slaughtered.
50. Stunning equipment which does not meet relevant Annex II legal requirements concerning stunning parameters prevents the stunning operator being aware of instances when the stunning equipment malfunctions and does not produce an effective stun. In addition, it is not possible for BOs or OVs to perform retrospective checks to verify that the parameters applied met the minimum legal requirements.
51. OVs did not routinely verify that stunning equipment is maintained in accordance with the manufacturer's instructions. Poorly maintained stunning equipment can result in ineffective stunning leading to unnecessary pain, distress or suffering of

animals.

5.3 Handling and restraining operations at slaughterhouses

Legal Requirements

Article 15 of Regulation (EC) No 1099/2009

Findings

52. In all slaughterhouses visited by the audit team, the procedures for reception, handling and restraining of animals were well managed by BO staff. These procedures were described in the relevant BOs' SOPs and were generally in line with legal requirements.
53. The Authority's report from the 2014 audit and MAST's internal audit report from 2016 both mention lack of arrangements for feeding of animals in the lairage if they stay for more than 12 hours and the need for access to clean water at all times. The audit team noted that in all red meat slaughterhouses arrangements related to feeding were implemented and drinking water is available in all pens and easily accessible to all animals.
54. Lairages were in general satisfactory in all slaughterhouses visited. However, in three out of four red meat slaughterhouses, there were no visible signs displaying maximum capacities for the pens for different species/categories of mammals or the date and time of arrival of such animals, contrary to Article 15 and Point 2.3. of Annex III of Regulation (EC) No 1099/2009. The audit team noted that in the relevant slaughterhouses the OV's were not aware of this requirement. In one of the slaughterhouses, the stocking densities had been defined in the BO's SOPs and from these figures it was clear, when the audit team was present, that one pen with pigs was overstocked.
55. Use of electric prods was not evident in any of the slaughterhouses visited by the audit team, which is regarded as a good practice. MAST explained that they are not aware of any Icelandic slaughterhouse using electric prods.

Conclusions

56. Handling and restraining operations were performed well in all cases observed. The lairages in general met the requirements with the exception of lack of signage clearly displaying the maximum capacity for pens and date and time of arrival of animals. This increases the likelihood of overstocking of pens (noted by the audit team in one case) and makes it difficult for the animals to lie down at the same time and to access water.

5.4 Stunning operations

Legal Requirements

Articles 3, 4(1), 5, 6, 9 and 16 of Regulation (EC) No 1099/2009

Findings

5.4.1 *Stunning methods and checks on stunning*

57. Stunning procedures and their effectiveness are regularly checked by the OV's during their daily checks and recorded in the checklists.
58. SOPs in all slaughterhouses visited contained descriptions of stunning and bleeding procedures, including stunning parameters to be used for each category of animals, as required by Article 6(2) of Regulation (EC) No 1099/2009. SOPs also describe the use of the back-up stunning equipment, which was present and satisfactorily maintained in all slaughterhouses visited pursuant to Article 9(2) of Regulation (EC) No 1099/2009. It was noted that SOPs did not require any routine checks by the operator who performs stunning to verify if the stunning was effective and if there is a need to apply back-up equipment pursuant to Articles 5 and 16 of Regulation (EC) No 1099/2009.
59. BO staff should carry out regular checks on a sample of animals to ensure that the animals do not present any signs of consciousness or sensibility in the period between the end of the stunning process and death, pursuant to Article 5 of Regulation (EC) No 1099/2009. These checks were observed in the majority of slaughterhouses visited by the audit team. However, in both bovine slaughterhouses visited, it was noted that the person responsible for slaughter started dressing the animals before bleeding was finished without verifying the absence of signs of life, contrary to Article 15 and Point 3.2. of Annex III of Regulation (EC) No 1099/2009. No actions were taken by the OV's in these slaughterhouses to verify that dressing procedures only start when animals do not present any signs of life.
60. In one of the above mentioned bovine slaughterhouses, the requirement to check for signs of life before dressing commenced was not described in the SOP and this omission from the SOP was not detected during official controls. In the second slaughterhouse, the SOP contained a provision that dressing can start 40 seconds after sticking. The OV was not aware of the dressing timing provision in the SOP and could not confirm that 40 seconds after sticking the animals would not have any signs of life.
61. In a pig slaughterhouse, the operator using electric tongs for stunning pigs did not always position the tongs in an optimal position to ensure an effective stun, i.e. to span the brain. In some cases, tongs were first applied on the chin or neck, and only later placed in the position which spanned the brain. Such misplacement of the tongs causes painful electric shocks before stunning. In addition, in a poultry slaughterhouse the birds congested the entrance to the water bath with the result that some birds received a pre-stun shock. This is contrary to Article 3 of Regulation (EC) No 1099/2009 which requires that animals shall be spared any avoidable pain, distress or suffering during their killing and related operations. No actions were taken by the OV's in either of these cases.

5.4.2 *Slaughter without stunning*

Findings

62. Slaughter of animals without stunning is not allowed in Iceland. Article 21 of IS Act No 55/2013 on welfare of animals requires that animals shall be stunned without exceptions when killed.

Conclusions

63. Systems for checking stunning procedures put in place by BOs generally ensures that animals are effectively stunned before slaughter. However, inadequate or inappropriate provisions in the BO's SOPs in the pre- and post- stun phase combined with insufficient control and enforcement of relevant requirements by OV's results in animals suffering unnecessary pain and distress in some instances.

5.5 Killing animals outside of slaughterhouses

Article 3(1), 4(1) and 7(1) of Regulation (EC) No 1099/2009

Findings

64. The killing outside of slaughterhouses of animals that are unfit for human consumption is generally defined in the IS Act 55/201 on animal welfare. This Act requires that animals must be stunned before being bled, except where the killing method used produces immediate loss of consciousness, as required by Article 4(1) of Regulation (EC) No 1099/2009. Following the killing procedure, the death of the animal must be confirmed. For birds, cervical dislocation is allowed. Specific requirements concerning killing of animals are further defined for each species in national farm animal welfare legislation and follow the general provision of Article 3(1) of Regulation (EC) No 1099/2009.

65. The audit team was informed that killing of animals outside of slaughterhouses is undertaken by farmers using their own equipment and that those farmers have received training/information about how to carry out killing, as required by Article 7(1) of Regulation (EC) No 1099/2009. This arrangements were not further investigated by the audit team.

66. Procedures and requirements for killing of non-production animals and animals unfit for human consumption, if done as provided for in the national legislation, ensures that animals are spared any avoidable pain, distress or suffering during killing.

6 Final meeting

A final meeting was held on 13 October 2021 at MAST's office in in Hafnarfjörður with representatives from MAST and the Moll. At this meeting, the audit team presented its main findings and preliminary conclusions of the audit.

At the meeting, the audit team also explained that, based on a more detailed assessment of the information received during the audit, additional findings and conclusions could be included in the report.

During this meeting, MAST did not express any disagreement with the findings and preliminary conclusions of the audit team.

7 Recommendations

In order to facilitate the follow-up of the recommendations hereunder, Iceland should notify the Authority no later than 20 March 2022, by way of written evidence, of additional

corrective actions planned or 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 advised. The Authority 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	<p>MAST should ensure that all official staff in slaughterhouses are trained and kept up to date in their area of competence. In particular, OVs should have an adequate knowledge of animal welfare at the level of production, transport and slaughter.</p> <p>Recommendation based on conclusion: 36</p> <p>Associated findings: 11, 43</p> <p>Legal basis for recommendation: Article 5(4) of Regulation (EU) 2017/625 and Article 13 and Annex II of Regulation (EU) 2019/624, in particular (regarding OVs) Points 3.(s), 5. and 6. of Chapter I of Annex II.</p>
2	<p>MAST should ensure that official controls on animal welfare at the time of killing are among those official controls planned and performed on the basis of a MANCP.</p> <p>Recommendation based on conclusion: 37</p> <p>Associated findings: 12</p> <p>Legal basis for recommendation: Articles 109 and 110 of Regulation (EU) 2017/625</p>
3	<p>MAST should ensure that official controls are carried out on a risk basis taking into account identified risks associated with animal welfare at the time of killing and related operations.</p> <p>Recommendation based on conclusion: 36</p> <p>Associated findings: 28</p> <p>Legal basis for recommendation: Article 9(1)(a)(iv) of Regulation (EC) 2017/625</p>
4	<p>MAST should ensure that those slaughter operations defined in Article 7(2) of Regulation (EC) No 1099/2009 are only carried out by persons holding a certificate of competence and that certificates of competence are delivered to relevant persons only after they have passed an independent final examination.</p> <p>Recommendation based on conclusion: 40</p> <p>Associated findings: 22, 23, 24, 25, 26</p> <p>Legal basis for recommendation: Articles 7(2) and 21(1)(b) of Regulation (EC) No 1099/2009</p>
5	<p>MAST should ensure that official controls are performed in line with requirements of Article 18 of Regulation (EU) No 2017/625 and that methods and techniques for official controls include the requirements of Article 14 of Regulation (EU) No 2017/625 and in particular the examination of the controls that operators have put in place and the results obtained.</p>

	<p>Recommendation based on conclusion: 41, 49, 50, 51, 56, 63</p> <p>Associated findings: 30, 31, 32, 45, 46, 47, 54, 59, 60, 61</p> <p>Legal basis for recommendation: Articles 14 and 18 of Regulation (EU) No 2017/625</p>
6	<p>MAST should ensure that when they identify a non-compliance, they take action to ensure that the operator remedies the situation and prevents further occurrences of such non-compliance.</p> <p>Recommendation based on conclusion: 42</p> <p>Associated findings: 34</p> <p>Legal basis for recommendations: Article 138(1)(b) of Regulation (EU) 2017/625</p>
7	<p>MAST should ensure that all business operators meet their obligations on the protection of animals at the time of killing.</p> <p>Recommendation based on conclusion: 49, 50, 56, 63</p> <p>Associated findings: 30, 31, 44, 46, 56, 57, 59</p> <p>Legal basis for recommendation: Article 4, 5, 6, 14, 15, 16 and Annexes I, II and III of Regulation (EC) No 1099/2009</p>

Annex 1 - List of abbreviations used in the report

AWO	Animal Welfare Officer
Authority	EFTA Surveillance Authority
BO	Business Operator
BTSF	Better Training for Safer Food
CA	Competent Authority
CCA	Central Competent Authority
EC	European Community
EEA	European Economic Area
EEA Agreement	Agreement on the European Economic Area
EFSA	European Food Safety Authority
EU	European Union
MANCP	Single integrated multi annual national control plan
MAST	The Icelandic Food and Veterinary Authority
Moll	Ministry of Industries and Innovation
NGO	Non-governmental organisation
OV	Official veterinarian
SOP	Standard operating procedure

Annex 2 - Relevant legislation

The following EEA legislation was taken into account in the context of the audit:

- a) The Act referred to at Point 11b. of Part 1.1. of Chapter I of Annex I to the EEA Agreement, 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, as amended and as adapted to the EEA Agreement by the sectoral and the specific adaptations referred to in Annex I to that Agreement;
- b) The Act referred to at Point 2a. of Part 9.1. of Chapter I of Annex I to the EEA Agreement, Council Regulation (EC) No 1099/2009 of 24 September 2009 on the protection of animals at the time of killing, as amended and as adapted to the EEA Agreement by the sectoral adaptations referred to in Annex I to that Agreement;
- c) The Act referred to at Point 16. of Part 6.1. of Chapter I of Annex I to the EEA Agreement, Regulation (EC) No 852/2004 of the European Parliament and of the Council of 29 April 2004 on the hygiene of foodstuffs, as amended and as adapted to the EEA Agreement by the sectoral and the specific adaptations referred to in Annex I to that Agreement;
- d) The Act referred to at Point 17. in Part 6.1. of Chapter I of Annex I to the EEA Agreement, Regulation (EC) No 853/2004 of the European Parliament and of the Council of 29 April 2004 laying down specific hygiene rules for food of animal origin, as amended and as adapted to the EEA Agreement by the sectoral and the specific adaptations referred to in Annex I to that Agreement;
- e) The Act referred to at Point 13. of Part 7.1. of Chapter I of Annex I to the EEA Agreement, Regulation (EC) No 178/2002 of the European Parliament and of the Council of 28 January 2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety, as amended and as adapted to the EEA Agreement by the sectoral and the specific adaptations referred to in Annex I to that Agreement.
- f) The Act referred to at Point 11by. of Part 1.1. of Chapter I of Annex I to the EEA Agreement, Commission Delegated Regulation (EU) 2019/624 of 8 February 2019 concerning specific rules for the performance of official controls on the production of meat and for production and relaying areas of live bivalve molluscs in accordance with Regulation (EU) 2017/625 of the European Parliament and of the Council, as adapted to the EEA Agreement by the sectoral and the specific adaptations referred to in Annex I to that Agreement; and
- g) The Act referred to at Point 11bk. of Part 1.1. of Chapter I of Annex I to the EEA Agreement, Commission Implementing Regulation (EU) 2019/627 of 15 March

2019 laying down uniform practical arrangements for the performance of official controls on products of animal origin intended for human consumption in accordance with Regulation (EU) 2017/625 of the European Parliament and of the Council and amending Commission Regulation (EC) No 2074/2005 as regards official controls, as adapted to the EEA Agreement by the sectoral and the specific adaptations referred to in Annex I to that Agreement.

Annex 3 - Iceland's comments to draft report

Attachment #2

MAST commend on finding no. 17 in Draft report on animal welfare at the time of killing

The Icelandic version of the guidelines on protection of sheep during transport was originally submitted to ESA as Attachment 15 to the Pre-mission questionnaire. During the visit to Sjórnugrís in the beginning of the audit the Senior Veterinary Officer for Meat Inspection showed the English version of the guidelines to the audit team on the internet. In finding no. 17 it is however stated that:

“In addition, the team noted, in one district visited, that a guide to protection of sheep during transport had been developed by an OV and is available on the MAST website. The guidance include good practices on unloading and handling of sheep at a slaughterhouse.”

The guidelines were not developed by this single OV in the NA-district but developed in co-operation by the Senior Veterinary Officer for Meat Inspection, the Senior Veterinary Officer for Cattle and Sheep and the OV in question. This misunderstanding was corrected by the senior veterinary Officer for Meat Inspection during the final meeting and is iterated here.

The guidelines are available both in Icelandic and English and final version of the guidelines are accessible on MAST website:

<https://www.mast.is/static/files/leidbeiningar/Slaturhus/leidbeiningar-um-flutning-saudfjar-i-slaturhus-20210826.pdf>

https://www.mast.is/static/files/leidbeiningar/Slaturhus/as_transport-guide-sheep-070921.pdf

Annex 4 - Iceland's action plan for corrective measures

Attachment #1

Annex 1 TOC – Table of corrective actions ESA mission 2021

No	Recommendation	Reaction of Icelandic authorities	Date of compliance	Comment/attachment
1	<p>MAST should ensure that all official staff in slaughterhouses are trained and kept up to date in their area of competence. In particular, OVs should have an adequate knowledge of animal welfare at the level of production, transport and slaughter.</p> <p>Recommendation based on conclusion: 36</p> <p>Associated findings: 11, 43</p> <p>Legal basis for recommendation: Article 5(4) of Regulation (EU) 2017/625 and Article 13 and Annex II of Regulation (EU) 2019/624, in particular (regarding OVs) Points 3.(s), 5. and 6. of Chapter I of Annex II.</p>	<p>The goal of Matvælastofnun (CA) is to ensure that only qualified veterinarians are appointed as official veterinarians and as part of that plan the training of unexperienced official veterinarians (and other official control staff) will take into consideration the following:</p> <ul style="list-style-type: none"> • Measure the need for training • Set up a training framework for each official • Evaluation of the training <p>in line with Art. 5(4) of Regulation (EU) 2017/625 and Art. 13 and Annex II of Reg. (EU)2019/624, in particular (regarding OVs) Points 3(s), 5 and 6 of Chapter I of Annex II will be included in this review</p> <p>To achieve this goal MAST is, and has been reviewing, the entire training structure/model within MAST and the starting point was to establish and issue a Training Programme in November 2020, LBE-198 and an accompanying procedure VRF-043 in April 2021. These two documents will form the basis for the future training structure that MAST intends to implement and finalize at the latest by the end of August 2023.</p> <p>As part of that work MAST has identified the following milestones:</p> <p>February 2022</p> <p>A new computer system in place that will enable MAST to identify training required for position / everyone within MAST and keep track of training needs, completion of training and a list of competencies for each individual working for MAST.</p>	February 2022	

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		<p>May 2022</p> <p>Scrutiny of training needs and training material needed for different positions within MAST identified both for initial and recurrent training.</p> <p>August 2022</p> <p>Guidance on the responsibilities of directors to ensure their staff members receive necessary training and for that purpose how to evaluate the competencies of the staff and training needs. Also, who should provide theoretical (on-site or e-learning) and on the job training and how to confirm the competence.</p> <p>October 2022</p> <p>Training material, courses and related tests have been uploaded in the system and introduced to all directors with employees under their supervision for review.</p> <p>February 2023</p> <p>MAST training system implemented but under constant review.</p>	<p>May 2022</p> <p>August 2022</p> <p>October 2022</p> <p>February 2023</p>	
2	<p>MAST should ensure that official controls on animal welfare at the time of killing are among those official controls planned and performed on the basis of a MANCP.</p> <p>Recommendation based on conclusion: 37</p> <p>Associated findings: 12</p>	<p>Animal welfare at the time of killing will be included in MANCP as follows:</p> <p>4.6.6. Velferð dýra við aflifun</p> <p>Reglugerð 911/2012 um vernd dýra við aflifun.</p> <p>Daglegt eftirlit við slátrun fer fram skv. skoðunarhandbókum, þar sem fram koma gæðaskjöl sem unnið er eftir. Daglegt eftirlit er ekki byggt á kerfisbundinni áhættugreiningu. Daglegt eftirlit í slátruhúsum fer skv. skoðunarhandbókunum „Daglegt eftirlit</p>	End January 2022	

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	<p>Legal basis for recommendation: Articles 109 and 110 of Regulation (EU) 2017/625</p>	<p>við slátrun á sauðfé, svinum og stórgripum“ og „Daglegt eftirlit við slátrun alifugla“.</p> <p>Reglubundið eftirlit í slátruhúsum er áhættumiðað skv. áhættu- og frammistöðuflokkun fôður- og matvælafyrirtækja undir eftirliti MAST og miðast við áhættu vegna matvæla, en ekki vegna dýravelferðar. Reglubundið eftirlit í slátruhúsum fer skv. skoðunarhandbókinni „Matvæli úr dýrarikinu“. Eftirlitsskýrsla er gerð við reglubundið eftirlit, þar sem farið er yfir niðurstöður úr daglegu eftirliti, frávikaskýrslur og hvort athugasemdum hefur verið sinnt og þeim framfylgt.</p> <p>Eftirfylgni, þvingunaraðgerðir fer eftir kafla 1.5.2 í Skoðunarhandbók fyrir matvæli úr dýrarikinu. Eftirfylgni með frávikum úr daglegu eftirliti skal vera skv. LBE-166/LBE-173. Sjá LBE-124.</p> <p>Samræming á eftirliti með velferð við aflifun dýra er</p> <ul style="list-style-type: none"> • innan tegundar er hjá sérgreinadýralækni tegundar, ef aflifun fer fram utan slátruhúss. • Í slátruhúsum og flutningi á slátruhús fellur á sérgreinadýralækni velferðar slátrurdýra. <p>A link with the updated MANCP will be shared with ESA as soon as it has been published on the MAST website end of January 2022</p>		
3	<p>MAST should ensure that official controls are carried out on a risk basis taking into account identified risks associated with animal welfare at the</p>	<p>In general risk classification of establishments will include animal welfare and will be reviewed.</p> <p>Procedures for follow-up on animal welfare cases at the time of killing will be improved and staff trained to follow the procedure when needed.</p>	<p>December 31st 2022</p> <p>August 31st 2022</p>	

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	<p>time of killing and related operations.</p> <p>Recommendation based on conclusion: 36</p> <p>Associated findings: 28</p> <p>Legal basis for recommendation: Article 9(1)(a)(iv) of Regulation (EC) 2017/625</p>			
4	<p>MAST should ensure that those slaughter operations defined in Article 7(2) of Regulation (EC) No 1099/2009 are only carried out by persons holding a certificate of competence and that certificates of competence are delivered to relevant persons only after they have passed an independent final examination.</p> <p>Recommendation based on conclusion: 40</p> <p>Associated findings: 22, 23, 24, 25, 26</p>	<p>MAST will change the procedure of the e-tests back to what they used to be. Meaning that the e-tests will be opened manually by Veterinary officer for meat inspection and an employee of MAST will be present while the slaughterhouse workers finish the e-tests. The animal welfare officer or the quality manager of the slaughterhouse will be allowed to translate the questions on the e-tests in cases where the slaughterhouse workers are not fluent in English or Icelandic, but the employee of MAST will ensure that this assistance is only in the form of translation and not any other kind of help. This requires cooperation with Animalia and their agreement on changing their data system. It will be made sure that the e-course and e-tests are available both in Icelandic and English.</p>	<p>August 31st 2022</p>	

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	Legal basis for recommendation: Articles 7(2) and 21(1)(b) of Regulation (EC) No 1099/2009			
5	<p>MAST should ensure that official controls are performed in line with requirements of Article 18 of Regulation (EU) No 2017/625 and that methods and techniques for official controls include the requirements of Article 14 of Regulation (EU) No 2017/625 and in particular the examination of the controls that operators have put in place and the results obtained.</p> <p>Recommendation based on conclusion: 41, 49, 50, 51, 56, 63</p> <p>Associated findings: 30, 31, 32, 45, 46, 47, 54, 59, 60, 61</p> <p>Legal basis for recommendation: Articles</p>	<p>Inspections manuals for daily inspection at slaughterhouses and related check lists will be updated and OV trained to perform the official controls required by this recommendation.</p> <p>Regular inspections will cover some of the official controls that can be checked regularly (accessibility of manuals for stunning equipment, maintenance of stunning equipment other than what is controlled during daily inspections).</p>	December 31 st 2022	December 31 st 2022

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	14 and 18 of Regulation (EU) No 2017/625			
6	<p>MAST should ensure that when they identify a non-compliance, they take action to ensure that the operator remedies the situation and prevents further occurrences of such non-compliance.</p> <p>Recommendation based on conclusion: 42</p> <p>Associated findings: 34</p> <p>Legal basis for recommendations: Article 138(1)(b) of Regulation (EU) 2017/625</p>	<p>Procedures for reactions to non-compliances during daily inspections at slaughterhouses are already in place (LBE-166/LBE-173). DVOs and OVs will be trained in following the procedure.</p>	August 31 st 2022	
7	<p>MAST should ensure that all business operators meet their obligations on the protection of animals at the time of killing.</p> <p>Recommendation based on conclusion: 49, 50, 56, 63</p>	<p>A letter will be sent to FBOs informing them that their stunning equipment has to fulfill the requirements of EC 1099/2009 and that their SOPs regarding protection of animals at the time of killing has to fulfill the requirements of EC 1099/2009 and EC 2017/625 and that these SOPs are accessible to MAST staff at all times.</p>	<p>Letter to the FBOs will be sent 30th of April 2022 the latest</p> <p>FBOs corrective actions should be finalized by 31st December 2022</p>	

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Associated findings: 30, 31, 44, 46, 56, 57, 59 Legal basis for recommendation: Article 4, 5, 6, 14, 15, 16 and Annexes I, II and III of Regulation (EC) No 1099/2009			
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