ESA | EFTA Surveillance Authority

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Final report

EFTA Surveillance Authority's audit to

Norway to evaluate official controls related to poultry meat and poultry meat products from 20 - 29 June 2022

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. Information on the corrective actions already taken and planned are included in Annex 3 to the report.

Executive Summary

This report describes the outcome of an audit carried out by the EFTA Surveillance Authority (ESA) in Norway from 20 - 29 June 2022.

The objective of the audit was to verify compliance with the applicable European Economic Area (EEA) food safety legislation governing poultry meat and their products and the implementation of related official controls.

A system for risk based official controls in poultry slaughter and poultry processing establishments is currently being developed. The risk based official controls are planned on the basis of priorities set by the national competent authority (CA) and the use of a risk model which is based on the size and activity of the food business operator (FBO). This provides Norwegian Food Safety Authority (NFSA) staff with a baseline for the number of official controls to be completed annually in approved establishments. The frequency of these official controls is then finalised at regional level based on local knowledge and resource. However, the CA confirmed that the use of the risk model is not currently obligatory. These official controls do not currently ensure that the objectives of the hygiene legislation are fully met in poultry processing establishments as not all non-compliances related to e.g. general hygiene issues, infrastructure and animal by-products (ABPs) are being detected.

The audit team found that official controls related to ABPs are weak and do not ensure FBO compliance with the relevant Regulations. Consequently, official controls in this area do not ensure the prevention and minimisation of risks to human and animal health arising from ABPs.

There are currently no arrangements for routine verification of the implementation of official controls related to the production of poultry meat and poultry meat products at national level. This limits opportunities for the CA to ensure that official controls are implemented correctly or to continuously improve the official controls system.

CA allow slaughterhouse staff to assist in the performance of official controls related to post-mortem inspection in establishments slaughtering poultry. A system is in place to ensure they are appropriately trained and their supervision, on qualification, generally fulfils requirements.

There is limited central guidance available for CA staff on how to perform certain official controls in approved poultry processing establishments. Guidance has been developed at department level which is helpful, but the guidance tends to be incomplete or inconsistent across the regions. This weakens the quality and consistency of official controls in this sector.

CA have established procedures for the approval and listing of poultry processing establishments. Some discrepancies were observed in updating the official list of approved poultry establishments though the overall approval process was seen to work well.

The report includes a number of recommendations addressed to the Norwegian 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 20 to 29 June 2022. The audit team comprised two auditors from the EFTA Surveillance Authority (ESA).

ESA sent a pre-audit questionnaire to the Norwegian Food Safety Authority (NFSA) on 9 March 2022 and received the reply ('the pre-audit document') on 13 May 2022.

An opening meeting was held with representatives of both the Norwegian Ministry of Health and Care Services and the NFSA on 20 June 2022 at the NFSA's Head Office in Oslo. At that meeting, the audit team confirmed the objectives and the itinerary of the audit and the Norwegian representatives provided additional information to that set out in the pre-audit document.

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

A final meeting was held at the NFSA's Head Office in Oslo on 29 June 2022, 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 compliance with the applicable EEA food safety legislation governing production of poultry meat and their products and the implementation of related official controls.

The scope of the audit included:

- Slaughter and all stages of production of poultry meat and their products in approved establishments;
- Official controls related to poultry slaughter, cutting, meat preparations, meat products and mechanically separated meat (MSM) in large and small throughput establishments;
- Official controls at central and regional level, including verification and audits;
- Main categories of poultry (broiler chickens and turkeys).

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

Furthermore, the audit was conducted through data and document reviews, interviews with officials and other parties concerned and verifications on-the-spot to evaluate how the official controls are being implemented.

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

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

	Number	Comments
Competent authorities	7	An initial, clarification and final meeting between the audit team and the central NFSA. Meetings in four Regions to discuss the official controls at department level.
Poultry slaughterhouses, cutting and processing establishments	5	
Poultry cutting and processing establishment	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 the ESA's planned audit programme.

ESA carried out an audit regarding the application of EEA legislation related to food safety control systems in place governing the production and placing on the market of poultry meat and products in 2014. The final report from the 2014 audit can be found on the ESA website (www.eftasurv.int).

4.2 Information on trade

Information on the quantities of poultry meat traded within EEA countries and imported / exported from third countries was provided by the CA in the pre-audit documentation. See tables 2 and 3 below.

	2019		2020		2021	
	From Norway to other EEA countries	From EEA countries to Norway	From Norway to other EEA countries	From EEA countries to Norway	From Norway to other EEA countries	From EEA countries to Norway
Meat of Poultry origin (tons)	1001	980	1248	1152	1330	1435

Table 2: Quantities of poultry meat traded within the EEA

Table 3: Quantities of poultry meat imported /exported to /from Norway to /from third countries.

	2019		2020		2021	
	Import	Export	Import	Export	Import	Export
Meat of poultry origin (tons)	0	243.7	0	606.6	0	82.8

5 Findings and conclusions

5.1 Legislation and implementing measures

Legal Requirements

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

Findings

1. According to information provided by the Norwegian Food Safety Authority (NFSA) in response to ESA's pre-audit document, the relevant EEA legislation regarding poultry meat and poultry meat products is implemented in the Norwegian legal order.

Conclusions

2. The relevant EEA requirements related the production of poultry meat and poultry

meat products have been implemented in the Norwegian legal order.

5.2 Competent authorities

Legal Requirements

Articles 4(1), 5, 6, 138 and 139 of Regulation (EU) 2017/625

Article 13 and 14 of Regulation (EU) 2019/624.

Findings

5.2.1 Designation and organisation of competent authorities

3. Part 1 of Norway's country profile[1] describes the organisation of the Norwegian authorities and their control systems covering the whole chain of food animal production. The NFSA is the designated CA for food and feed safety, animal health and animal welfare.
4. The NFSA is organized into two administrative levels, the head office and the regions. The head office carries out directorate and governance tasks. The regional level consists of five regions, each divided into local departments. The regions are responsible for official control activities and the Director in each region is responsible for co-ordinating the activities of the local departments.

5.2.2 Personnel and training of staff

5. NFSA have developed a structured training course for both official veterinarians (OVs) and official auxiliaries (OAs) and these staff must pass a practical and theoretical test before being appointed. OV training is delivered by both NFSA staff and external providers and the course is currently being updated. Details of the course and training records for individual staff are kept in the RANSEL system (NFSAs e-training system).
6. CA confirmed that an inter-regional forum on poultry has been established and this allows officials to share information and exchange views e.g. in the development of the guidance on post-mortem inspection (PMI) conditions and judgements in poultry.
7. NFSA staff met were generally knowledgeable on requirements related to poultry slaughterhouses and poultry meat processing establishments. Some staff met confirmed their participation on Better Training for Safer Food ('BTSF') courses covering e.g. poultry animal health, animal by-products and Hazard Analysis and Critical Control Points (HACCP).
8. CA confirmed in the pre-audit document that slaughterhouse staff are appointed to assist OVs and OAs perform official controls related to post-mortem inspection of poultry in accordance with Article 18(3) of Regulation (EU) 2017/625.
9. NFSA confirmed a training programme for slaughterhouse staff, to allow them to carry out post-mortem inspection, has been developed in association with Animalia (the Norwegian Meat and Poultry Research Centre). A contract exists between the

[1] Country profile – Part 1 Norway, Competent authority control systems in the areas of food and feed safety, animal health and animal welfare

two organisations which clarifies the responsibilities and tasks for the delivery of the course.

10. The course consists of one week of theoretical training delivered by Animalia and a minimum of three weeks practical training under the supervision of NFSA staff in slaughterhouses. Guidance is available for NFSA staff to ensure uniform training is provided (ePhorte 2016/118269). The candidates must pass a theory and practical examination before they can carry out PMI without continuous supervision.
11. In all slaughterhouses visited by the audit team, sufficient numbers of trained slaughterhouse staff were performing post-mortem inspection under official supervision. Course certificates were available for all slaughterhouse staff requested by the audit team.

5.2.3 Audits and verification of effectiveness of official controls

12. According to the pre-audit document, there have been no internal audits performed in the poultry slaughter and processing sector within the past five years. Regional Directors of NFSA report to the NFSA's head office on implementation of the operational control plan (OTP - see paragraph 31) three times per year. CA confirmed no discussions involving the poultry processing sector had taken place during these meetings in the previous three years.
13. CA further confirmed that no verification of the priorities set by them in the OTP (related to the poultry processing sector) are carried out so NFSA head office are unsighted on whether the OTP requirements are met. In addition, there are currently no arrangements for routine verification of the implementation of official controls related to the production of poultry meat and poultry meat products at national level. National CA were unsighted on the non-compliances, observed by the audit team, in e.g. paragraphs 52, 53 and 71 of this report. This is not in compliance with Article 5(1)(a) of Regulation (EU) 2017/625.
14. A sample of audit reports carried out by NFSA staff based in the establishments visited by the audit team were reviewed. These reports were generally signed off at department level and did not always record non-compliances with implementation of hygiene requirements (see paragraphs 52 and 53).
15. CA advised that in one region visited, a decision had been taken at regional level to establish an audit team to perform all audits within the region rather than have the audits carried out by individual teams at department level.

5.2.4 Enforcement

16. Guidance on enforcement procedures covering all areas of NFSA supervisory work is described in the document "Administrative provision concerning infringement procedures" (ePhorte 2019/235152). The guidance includes, inter alia, instructions on: the proportionality of enforcement, verbal guidance; written advance warning of decisions, written decisions, emergency decisions (can be oral but must subsequently be confirmed in writing) and withdrawal of, for example, establishment approval.
17. The most recent (2020) Norwegian annual report on official controls (AROC) listed 60 non-compliances in approved establishments producing meat from poultry. CA confirmed, in the pre-audit document, that these related to e.g. general and specific requirements for food premises and equipment requirements and in most cases a decision had been issued by CA. In most cases no escalation of enforcement was required as the non-compliances were corrected.

18. The audit team reviewed official inspection reports for the slaughterhouses visited and noted several cases when adequate enforcement measures were taken by the CA in case of non-compliance, pursuant to Article 138 of Regulation (EU) 2017/625. These included cases where a decision had been issued in relation to microbiological criteria requirements and the need for effective sterilisation of equipment.

Conclusions

19. The CA responsible for official controls related to poultry meat and poultry meat products has been clearly designated.
20. Procedures for training NFSA staff are in place which should ensure they perform their official tasks related to poultry meat production competently. Similarly, procedures are in place to ensure that slaughterhouse staff are appropriately trained to assist with certain official controls. Their supervision, on qualification, generally fulfils requirements.
21. There are currently no arrangements for routine verification of the implementation of official controls related to the production of poultry meat and poultry meat products at national level resulting in the central and regional offices of the NFSA having limited oversight of these controls. This limits opportunities for the CA to ensure that official controls are implemented correctly or to improve the official controls system.
22. Enforcement procedures have been established and were appropriately used in establishments visited.

5.3 Organisation of official controls

Legal Requirements

Article 17 of Regulation (EC) No 178/2002, Articles 5, 9, 10, 13, 14, 18, 34 and 148 of Regulation (EU) 2017/625

Articles 10 to 14, 25, 43 and 45 of Regulation (EU) 2019/627

Findings

5.3.1 Ante-mortem inspection

23. CA confirmed, in the pre-audit document, that all ante-mortem inspection (AMI) of poultry intended for slaughter is carried out by an OV at the slaughterhouse. In addition, neither the NFSA official auxiliaries nor the slaughterhouse staff have a role in AMI in poultry slaughterhouses.
24. In all slaughterhouses visited by the audit team, AMI was seen to be performed by an OV in lairages of suitable infrastructure. Flocks were identifiable to producers and OVs had established systems locally to ensure flocks were subjected to AMI before they were slaughtered. This included official AMI sign off by the OVs to inform FBOs AMI had been completed and slaughter could proceed.

25. Food chain information was available for all flocks slaughtered (see paragraphs 54 - 56) and was reviewed by CA prior to slaughter. OVs were seen to perform AMI on a representative sample of birds from each flock as permitted by Article 11(1) of Regulation (EU) 2019/627.

5.3.2 Post-mortem inspection

26. According to the pre-audit document, slaughterhouse staff perform post-mortem inspection (PMI) in the majority of poultry slaughterhouses in Norway. This is carried out under the supervision of OVs and official auxiliaries (OAs). CA confirmed that slaughterhouse staff only perform PMI and do not perform any other official control duties e.g. sampling.
27. A guidance document on post-mortem conditions and decisions in poultry has been developed by CA (ePhorte 2017/92939). This document provides support to official staff when making post-mortem judgements by listing conditions along with the appropriate judgements and is based on the requirements of Article 45 of Regulation (EU) 2019/627.
28. In all slaughterhouses visited by the audit team, PMI was performed by slaughterhouse staff. Suitable inspection facilities were in place and the number of slaughterhouse staff present was considered sufficient by the audit team to allow for PMI relative to the speed of the slaughter line. Correlation between carcases and the accompanying offals was also considered satisfactory in the slaughterhouses visited.
29. Local guidance on how to conduct PMI was available in all slaughterhouses visited (see paragraphs 38 and 39) and systems were in place to ensure OVs or OAs performed daily inspections of the viscera and body cavities of a representative sample of each flock.
30. Arrangements were mostly in place to allow OVs or OAs to carry out a detailed inspection of a random sample of parts of birds or entire birds declared unfit for human consumption following post-mortem inspection by slaughterhouse staff, for each flock. However, in one region, OV confirmed they did not perform this detailed inspection on each flock. This is not in accordance with Article 25(1)(b) of Regulation (EU) 2019/627.

5.3.3 Risk based official controls and documented control procedures

31. According to the pre-audit document, there is a long term plan for official controls which describes priorities at national level. Each year, the NFSA's head office issues a budget disposal letter (BDL) based on this long term plan to the NFSA's regional offices which contains e.g. ongoing tasks and priorities. Based on BDL, an annual control plan (OTP) is developed which sets, inter alia, areas of official controls for prioritisation and minimum frequencies for these controls. Based on the OTP, the NFSA's regional offices develop their operational plan which sets targets to undertake controls of, or supervise, all parts of the food sector. For example, in 2021 the NFSA regional offices were required to evaluate pre-operational, operational and post-operational hygiene, water quality and traceability in slaughterhouses. In 2022, the requirement is to evaluate traceability and withdrawal systems and practices based on HACCP in food production establishments and slaughterhouses.
32. For the priority areas, guidance is provided to staff in the form of templates which include e.g. legal references and a description of their requirements.
33. CA confirmed that at the beginning of each year they meet with the regions to explain the priorities and the required frequency of controls outlined in the OTP. The

audit team saw an agenda from one such meeting specifically for official staff involved in poultry slaughterhouses and processing establishments.

34. In addition, CA confirmed a model for risk based official controls, to determine the frequency of official controls in registered and approved food establishments, is currently under development. The model is based on a series of tables (for different types of food establishment) which uses the activities and scale of production to assign an audit frequency to establishments. CA confirmed that the use of the risk model is not currently obligatory by regions and the audit team saw examples of the calculated frequency of controls being reduced at regional level and local staff attributed this to resource constraints.

35. This system for risk based official controls together with OTP requirements provides NFSA staff in poultry slaughter and poultry processing establishments with a baseline for the number of official controls to be completed annually in approved establishments. The frequency of these official controls is then finalised at Regional level based on local knowledge and resource.

36. In a region visited by the audit team, officials in one slaughterhouse were also providing FBO with a report based on their regular hygiene observations made during the preceding two month period. This was in addition to OTP requirements. In another region, officials did not complete the hygiene audit prioritised in the 2021 OTP. This had not been noted at central level.

37. According to the pre-audit document, a selection of guidance is available for officials working in poultry processing establishments. This includes, for example, generic guidance on how to carry out an inspection, a sampling instruction and guidance on the preparation, approval and control of inspection reports. In addition, technical guidance is available such as guidance on post-mortem judgements (ePhorte 2017/92939), guidance on Campylobacter sampling in slaughterhouses (ePhorte 2016/108483) and guidance on training of slaughterhouse staff (ePhorte 2016/118269).

38. However, CA confirmed that no central guidance is available for officials related to e.g. evaluation of FCI, ante-mortem inspection or how to perform post-mortem supervision of slaughterhouse staff. Instead, it is left to local staff to decide how to perform these official controls. In all slaughterhouses visited by the audit team (across four regions of Norway) officials had developed their own local guidance to address these issues.

39. However, inconsistencies in the local guidance was observed. For example, in two of the four regions visited by the audit team, department guidance included the requirement for OV or OA to carry out a detailed inspection of a random sample of parts of birds or entire birds declared unfit for human consumption following PMI from each flock as required by Article 25(1)(b) of Regulation (EU) 2019/627. In the other two regions, department guidance did not include this requirement.

40. Several staff interviewed considered that guidance was missing or incomplete in certain areas e.g. they were unsure how to react to information on high mortalities provided in FCI and considered guidance on process hygiene criteria requirements for Campylobacter in poultry could be improved.

5.3.4 Approval of food business operators

41. CA confirmed, in the pre-audit document, that guidance is available for officials on approval procedures to follow when dealing with FBOs producing foodstuffs of animal origin (ePhorte 2017/348). The guidance includes, inter alia, how to proceed with an approval, how the relevant regulations should be understood and how to

withdraw approval. CA further confirmed that official controls related to approval are carried out at department level.

42. In one recently approved establishment visited by the audit team, CA granted the establishment conditional approval followed by a prolongation of conditional approval and then full approval. All stages of approval involved an on-site visit and were performed within the timelines set by Article 148 of Regulation (EU) 2017/625.
43. Approval documentation for an additional two recently approved establishments was reviewed by the audit team. In both cases conditional and full approval had been granted within the correct timelines.
44. At the time of audit, three slaughterhouses were listed on the EEA list of approved establishments as poultry slaughterhouses despite not slaughtering poultry for at least the three previous years. This is not in accordance with NFSA guidance on approval procedures (which requires approval to be withdrawn if the activity no longer takes place) nor the requirement for CA to keep the approval of establishments under review in accordance with Article 148 of Regulation (EU) 2017/625.

Conclusions

45. Official controls related to AMI is performed satisfactorily. Official controls related to PMI are weakened in cases where officials do not routinely examine a random sample of parts of birds or entire birds declared unfit for human consumption following post-mortem inspection by slaughterhouse staff of each flock. This increases the possibility of unsafe food entering the human food chain and animal diseases not being detected.
46. There is incomplete guidance available to assist official staff perform their tasks. Guidance has been developed at department level which is helpful, but the guidance tends to be incomplete or inconsistent across the regions. This weakens the quality and consistency of official controls.
47. The competent authority is currently developing a risk based system for official controls in all approved and registered establishments. At present, its use is not obligatory. Consequently, the frequency of audits is determined more by regional resources rather than the calculated frequency of audit required using the risk based system. This tends to reduce the number of audits performed at establishment level.
48. CA have established procedures for the approval and listing of poultry processing establishments which overall, were seen to work well.

5.4 Official controls over Food Business Operators' compliance with hygiene rules at establishment level

Legal Requirements

Article 18 of Regulation (EU) 2017/625

Regulation (EC) No 2073/2005

Article 3, 9, 10, 35, 36, 40, 41 and 42 of Regulation (EU) 2019/627

Article 4 and 5 of Regulation (EC) No 852/2004, Article 3 and 5 and Annex II, Sections I and III and Annex III, Section II of Regulation (EC) No 853/2004

Chapters I and II of Annex VIII of Regulation (EU) 142/2011

Findings

5.4.1 General and specific hygiene rules

49. Official controls in respect of meat should include, inter alia, the verification of FBO compliance with requirements applicable to the hygiene of meat production, audits of good hygiene practice (GHP) and procedures based on HACCP principles and the handling and disposal of animal by-products as required by Article 18 of Regulation (EU) 2017/625.

50. Audits of good hygiene practices should verify that FBOs apply procedures continuously and properly concerning, inter alia, design and maintenance of premises and equipment, pre-operational, operational and post-operational hygiene and personal hygiene as required by Article 3 of Regulation (EU) 2019/627.

51. Recent reports on official controls, reviewed by the audit team for the establishments visited, identified certain non-compliances with e.g. sterilisers, HACCP plans which required updating and unsatisfactory microbiological results. Notification of decisions or decisions were issued in these examples.

52. However, not all hygiene deficiencies were being detected by officials. For example, the audit team observed, in the majority of regions visited, examples of poor control of waste water in processing areas, longstanding issues with poor cleaning of premises, issues with infrastructure such as missing panelling on walls and flaking paint and personal hygiene issues such as outside clothing not fully covered by personal protective clothing while in production areas.

53. The audit team identified, in all regions visited, non- compliances related to animal by-products (ABPs) which had not been detected by officials. These included ABPs stored in the same chill as food for human consumption, ABPs stored uncovered outside, no differentiation between the receptacles used to store ABP and food for human consumption in processing areas and a lack of labels attached to packaging or containers containing ABPs to indicate the category of ABP and that it was not for human consumption (category 3 ABP) or not for animal consumption (category 2 ABP). These findings are not in accordance with point 7(a) and (b) of Chapter IV of Section II of Annex III of Regulation (EC) 853/2004, point 1 of Section I of Chapter I and point 2 of Chapter II of Annex VIII of Regulation (EU) 142/2011 respectively.

5.4.2 Food chain information

54. In the majority of slaughterhouses visited by the audit team, food chain information (FCI) was made available to the official veterinarian no less than 24 hours before arrival of the poultry at the slaughterhouse. In one establishment visited, CA permitted FCI to arrive less than 24 hours before arrival of the poultry. Both situations are in accordance with Annex II, Section III (2) and (7) respectively of Regulation (EC) 853/2004.

55. FCI was provided both electronically or in hard copy. When sent electronically, the audit team saw arrangements for FCI to be sent by FBO to an official shared mail-box in order that all OVs with responsibilities in the slaughterhouse had access to the information.

56. Examples of FCI were seen by the audit team which contained all the relevant information as required by Annex II, Section III (3) of Regulation (EC) 853/2004. This included details of the regional animal health status of a flock due to an outbreak of highly pathogenic avian influenza (HPAI) and production data which recorded mortalities of 5.5 % and 8.29 % for flocks in two different regions.

57. In one of the regions, the OV confirmed they had not reacted to the high mortality as they had no guidance and were unsure of the significance of the mortality data.

5.4.3 Hazard analysis and critical control point (HACCP) based procedures

58. Official controls should include, inter alia, verification of compliance with procedures based on HACCP principles as required by Article 18(2)(d)(iii) of Regulation (EU) 2017/625.

59. According to the pre-audit document, NFSA audits had a focus on management systems based on HACCP in slaughterhouses during 2020 and the current 2022 OTP includes a requirement to verify that FBOs follow the principles based on HACCP. Recent audit reports for the establishments visited by the audit team included observations and notices of decision related to HACCP.

60. However, pre-requisite requirements were not always fully implemented by FBOs e.g. cleaning, handling of waste and infrastructure (see paragraphs 52 and 53) and this was not always detected by officials.

5.4.4 Microbiological criteria

61. Norway has an established Salmonella national control programme (SNCP) which includes, inter alia, live poultry. All poultry slaughter flocks are sampled for Salmonella 10 – 19 days before slaughter. The Norwegian Veterinary Institute (NVI) issues an annual report summarising the findings of the SNCP and the most recent 2021 report documents that Norwegian poultry flocks have a low Salmonella prevalence (https://www.vetinst.no/en/surveillance-programmes/salmonella).

62. CA confirmed no official Salmonella sampling is carried out in poultry slaughterhouses.

63. An internal NFSA document on the frequency of sampling for Salmonella in carcases, minced meat, meat preparations and fresh poultry meat (ref. 2014/104686) was sent to the Regions in 2017. This document confirms that, based on the SNCP and the low prevalence of Salmonella in Norway, the frequency of FBO sampling for Salmonella analyses of carcases, minced meat, meat preparations and fresh poultry meat can be reduced to once per month. This is in accordance with Chapter 3.2 of Annex I of Regulation (EC) No. 2073/2005.

64. Examples of FBO laboratory reports for Salmonella sampling were seen by the audit team and the Nordic committee on food analysis (NMKL) methods used corresponded to the analytical reference methods in Chapters 1 and 2 of Annex I of Regulation (EC) No. 2073/2005.

65. CA confirmed they verify the correct implementation by FBOs of process hygiene requirements for Salmonella by collecting the total number and the number of Salmonella-positive samples taken in the SNCP (see paragraph 61). This is in accordance with Article 35(1)(c) of Regulation (EU) 2019/627.

66. The pre-audit document confirmed Norway has an established surveillance programme for Campylobacter in broiler flocks. All broiler flocks slaughtered up to 50 days of age during the period May – October are sampled on farm prior to slaughter with results available as part of food chain information or via a restricted portal in the NVI website.

67. A guide on process hygiene criteria requirements for Campylobacter analysis in carcases of broilers at slaughter has been provided to FBOs by the CA. This document describes the steps FBOs must take to meet the process hygiene criteria requirements. The document also confirms that broilers, aged 50 days old or less,

which are part of the (on farm) surveillance programme for Campylobacter do not require to be included in any slaughterhouse sampling plan.

68. Flocks slaughtered older than 50 days and any flock of unknown Campylobacter status should be included in the slaughterhouse sampling plan for Campylobacter.

69. Guidance for NFSA staff (e-Phorte 2020/96792) requires official follow up on FBO actions related to the slaughter of Campylobacter positive flocks and the slaughter of flocks of unknown Campylobacter status. This requires FBO to heat treat or freeze (for at least three weeks) the poultry meat. In one establishment visited by the audit team, officials had carried out an audit to ensure a Campylobacter flock had been appropriately heat treated / frozen. In other establishments visited, officials confirmed this was not done.

70. Examples of FBO sample plans and laboratory reports for Campylobacter were seen and considered satisfactory by the audit team. The NMKL method used corresponded to the analytical reference methods in Chapter 2 of Annex I of Regulation (EC) No. 2073/2005.

71. Training provided to official staff in 2021 included, inter alia, a requirement for staff to verify that slaughterhouses comply with the process hygiene criterion for broiler carcases. Notwithstanding, in two regions visited by the audit team, OVs confirmed they did not review FBO Campylobacter results. Consequently, in the absence of official sampling, there is incomplete verification by CA of the correct implementation by FBOs of the process hygiene criterion for Campylobacter on carcases of broilers as required by Article 36(1) of Regulation (EU) 2019/627.

5.4.5 Identification marking

72. In all establishments visited by the audit team, the identification mark applied to a random selection of finished product was reviewed. In one establishment visited, the form of the identification mark did not include “EFTA” as required by an adaptation to Regulation (EC) No 853/2004 listed in Annex I to the EEA Agreement (Veterinary and Phytosanitary Matters). This had not been detected by the CA. In all other establishments visited, the form of the identification mark used on poultry meat complied with Annex II, Section I(B) of Regulation (EC) No 853/2004 as adapted.

Conclusions

73. Official controls related to animal by-products are weak and do not ensure FBO compliance with the relevant Regulations. Consequently, official controls in this area do not ensure the prevention and minimisation of risks to human and animal health arising from animal by-products.

74. Official controls related to general hygiene issues do not detect all non-compliances which may increase the possibility of unsafe food entering the human food chain.

75. Controls over food chain information and identification marking of final product are generally satisfactory.

76. The frequency of Salmonella and Campylobacter sampling in slaughterhouses has been reduced, as permitted, when a national control programme in place. However, CA do not verify that slaughterhouses comply with the process hygiene criterion requirements for Campylobacter in broiler carcases. This prevents the CA from authenticating if corrective actions are / are not required by the FBO in order to maintain the hygiene of the process in compliance with food law.

6 Final meeting

A final meeting was held on 29 June 2022 at the NFSA's Head Office in Oslo with representatives from the Norwegian Ministry of Health and Care Services and the NFSA. At this meeting, the audit team presented its main findings and preliminary conclusions of the audit. The Competent Authority did not express any disagreement with the findings and preliminary conclusions.

7 Recommendations

In order to facilitate the follow-up of the recommendations hereunder, Norway should notify the Authority no later than 5 December 2022 of additional corrective actions planned or already taken other than those already indicated in the reply to the draft ESA report. In case no additional corrective actions have been planned, ESA should be informed of this. ESA 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	The NFSA should ensure that all food business operators meet their obligations on the control of animal by-products to include the correct labelling and storage of animal by-products. Recommendation based on conclusion: 73 Associated finding: 53. Legal basis for recommendation: point 7(a) and (b) of Chapter IV of Section II of Annex III of Regulation (EC) 853/2004, point 1 of Section I of Chapter I and point 2 of Chapter II of Annex VIII of Regulation (EU) 142/2011.
2	The NFSA should verify the correct implementation by food business operators of the process hygiene criterion for Campylobacter on carcases of broilers. Recommendation based on conclusion: 76 Associated finding: 71. Legal basis for recommendation: Article 36(1) of Regulation (EU) 2019/627.
3	The NFSA should have procedures and / or arrangements in place to ensure the effectiveness and appropriateness of official controls. Recommendation based on conclusion: 21, 45, 46, 73, 74 and 76. Associated findings: 12, 13, 36, 52, 53 and 71. Legal basis for recommendation: Article 5(1)(a) of Regulation (EU) No 2017/625.
4	The NFSA should ensure that the official veterinarian or official auxiliary carry out a detailed inspection of a random sample of parts of birds or entire birds declared

	unfit for human consumption following post-mortem inspection from each flock. Recommendation based on conclusion: 45. Associated finding: 30. Legal basis for recommendation: Article 25(1)(b) of Regulation (EU) 2019/627.
5	The NFSA should ensure that official controls are performed in accordance with documented procedures. Recommendation based on conclusion: 46. Associated finding: 38, 39, 40 and 57. Legal basis for recommendation: Article 12(1) of Regulation (EU) No 2017/625.

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

ABP	Animal by-products
Animalia	Norwegian Meat and Poultry Research Centre
AMI	Ante-mortem inspection
AROC	Annual report on official controls
BDL	Budget Disposal Letter
BTSF	Better Training for Safer Food
CA	Competent Authority
EC	European Community
ESA	EFTA Surveillance Authority
EEA	European Economic Area
EEA Agreement	Agreement on the European Economic Area
EU	European Union
FBO	Food Business Operator
FCI	Food chain information
HACCP	Hazard analysis and critical control point
HPAI	Highly pathogenic avian influenza
MANCP	Single integrated multi annual national control plan
MATS	NFSA's case processing and decision support tool
MSM	Mechanically separated meat
NFSA	Norwegian Food Safety Authority
NMKL	Nordic committee on food analysis
NVI	Norwegian Veterinary Institute
OA	Official auxiliary
OCR	Regulation (EU) 2017/625 – "Official Control Regulation"
OTP	Operational control plan
OV	Official veterinarian
PMI	Post-mortem inspection
RANSEL	NFSA e-training system

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 in 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 specific and sectoral adaptations referred to in Annex I to that Agreement;

b) The Act referred to at Point 13 in 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 specific and sectoral adaptations referred to in Annex I to that Agreement;

c) The Act referred to at Point 16 in 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 specific and sectoral 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 specific and sectoral adaptations referred to in Annex I to that Agreement;

e) The Act referred to at Point 11by in 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 amended and as adapted to the EEA Agreement by the specific and sectoral adaptations referred to in Annex I to that Agreement;

f) The Act referred to at Point 11bk in 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 amended and as adapted to the EEA Agreement by the specific and sectoral adaptations referred to in Annex I to that Agreement;

g) The Act referred to at Point 52 in Part 6.2 of Chapter I of Annex I to the EEA Agreement, Commission Regulation (EC) No 2073/2005 of 5 December 2005 on

microbiological criteria for foodstuffs, as amended and as adapted to the EEA Agreement by the sectoral adaptations referred to in Annex I to that Agreement;

h) The Act referred to at Point 9c in Part 7.1 of Chapter I of Annex I to the EEA Agreement, Commission Regulation (EU) No 142/2011 of 25 February 2011 implementing Regulation (EC) No 1069/2009 of the European Parliament and of the Council laying down health rules as regards animal by-products and derived products not intended for human consumption and implementing Council Directive 97/78/EC as regards certain samples and items exempt from veterinary checks at the border under that Directive, as amended and as adapted to the EEA Agreement by the specific and sectoral adaptations referred to in Annex I to that Agreement.

Annex 3 – Preliminary Action Plan

No	Recommendation from ESA	Action planned	Suggested time aspect
1	The NFSA should ensure that all food business operators meet their obligations on the control of animal by-products to include the correct labelling and storage if animal by-products. *Recommendation based on conclusion: 73* *Associated finding: 53.* Legal basis for recommendation: point7(a) and (b) of Chapter IV of Section II of Annex III of Regulation (EC) 853/2004, point 1 of Section I of Chapter I and point 2 of Chapter II of Annex VIII of Regulation (EU) 142/2011.	The most serious deviations found during the ESA inspection, related to finding 53, have already been followed up by advanced warning. <u>New webinar on animal by-products</u> -Includes both red and white meat. <u>Update the NFSAs course on upgrading the official veterinarians and official auxiliaries</u> -The NFSAs courses, that include the training on how to handle animal by-products, have been updated. 2022-08-25-Håndteri ng av animalske biprc <u>New guideline on slaughter hygiene for white meat -</u> -The guideline will include supervision of the FBOs handling of animal by-products. -After the publishing of the new guideline, the NFSAs headquarters will arrange training for the Regions on this matter.	Completed. Takes place on 29th of September 2022. Completed. March 2023. April 2023.

2	The NFSA should verify the correct implementation by food business operators of the process hygiene criterion for Campylobacter on carcases of broilers. *Recommendation based on conclusion: 76* *Associated finding: 71.* Legal basis for recommendation: Article 36(1) of Regulation (EU) 2019/627.	After the end of the audit, the Regions have verified the process hygiene criterion for Campylobacter on carcases of broilers. The results were satisfactory. <u>Update the NFSAs course on upgrading the official veterinarians and official auxiliaries</u> -The NFSAs course will be updated with the NFSAs obligations when it comes to verification of the slaughterhouses' sampling of process hygiene criterion for Campylobacter on carcases of broilers. -After the update of the course, the NFSAs headquarters will arrange a training for the Regions on this matter. <u>New guideline on slaughter hygiene for white meat -</u> -The guideline will include verification of the process hygiene criterion for Campylobacter on carcases of broilers. -After the publishing of the new guideline, the NFSAs headquarters will arrange training for the Regions on this matter.	Completed. March 2023. April 2023.
3	The NFSA should have procedures and / or arrangements in place to ensure the effectiveness and appropriateness of official controls. *Recommendation based on conclusion: 21, 45, 46, 73, 74 and 76.* *Associated findings: 12, 13, 36, 52, 53 and 71.* Legal basis for recommendation: Article 5(1)(a) of Regulation (EU) No 2017/625.	<u>Effectiveness</u> We have several ongoing initiatives that will contribute to ensure effectiveness of official control. This year we have allocated resources to collect, analyse and use data in a better way to work with the effectiveness of official control. In addition, we have ongoing work with “autonomous product teams” to give the inspectors better digital applications to use while on official control. We have also started to upgrade our management model,	

		reference 2022/41644 (MDS). Due to the reorganization, and the fact that we have a higher turnover than normal, this work is delayed. Hopefully, we will have procedures and / or arrangements in place to ensure the effectiveness of official control with effect from 2024. <u>New guideline on slaughter hygiene for white meat -</u> -The guideline will include procedures and / or arrangements in place to ensure the effectiveness and appropriateness of official controls. -After the publishing of the new guideline, the NFSAs headquarters will arrange training for the Regions on this matter.	April 2023
4	The NFSA should ensure that the official veterinarian or official auxiliary carry out a detailed inspection of a random sample of parts of birds or entire birds declared unfit for human consumption following post-mortem inspection from each flock. *Recommendation based on conclusion: 45.* *Associated finding: 30.* Legal basis for recommendation: Article 25(1)(b) of Regulation (EU) 2019/627.	<u>New guideline on slaughter hygiene for white meat</u> -The guideline will include supervision of the FBOs handling of inspection of a random sample of parts of birds, or entire birds, declared unfit for human consumption following post-mortem inspection from each flock. -After the publishing of the new guideline, the NFSAs headquarters will arrange training for the Regions on this matter.	March 2023. April 2023.

5	The NFSA should ensure that official controls are performed in accordance with documented procedures. *Recommendation based on conclusion: 46.* *Associated finding: 38, 39, 40 and 57.* Legal basis for recommendation: Article 12(1) of Regulation (EU) No 2017/625.	The NFSA will establish control verification procedures. A working group in the NFSA Head office, Regulations and Control Department will perform the task.	December 2022.