EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR HEALTH AND FOOD SAFETY

Directorate F - Food and Veterinary Office

DG(SANTE) 2015-7370 - MR

FINAL REPORT OF AN AUDIT

CARRIED OUT IN

SPAIN

FROM 26 JANUARY 2015 TO 06 FEBRUARY 2015

IN ORDER TO

EVALUATE THE OPERATION OF OFFICIAL CONTROLS OVER THE POST-SLAUGHTER TRACEABILITY OF MEAT, MEAT PRODUCTS AND PREPARATIONS, COMPOSITE PRODUCTS

In response to information provided by the Competent Authority, any factual error noted in the draft report has been corrected; any clarification appears in the form of a footnote.

Executive Summary

An audit to Spain was carried out from 26 January to 6 February 2015. The main objective of the audit was to evaluate the operation of official controls over the traceability of meat (meat of domestic ungulates, poultry, lagomorphs and game meat), minced meat, mechanically separated meat (MSM), meat preparations, meat products (hereafter referred to as meat and products thereof), and composite products containing meat and products thereof and other ingredients. Particular attention was paid to the traceability, labelling and identification systems of meat and products thereof, and to composite products containing meat and products thereof and traceability of quantities of each ingredient used.

Within the scope of the audit, the official control plans are implemented as foreseen and official controls are carried out in accordance with documented procedures. Verification of the food business operator's (FBO's) traceability procedures and labelling was carried out as part of Hazard Analysis Critical Control Point audits, but the checklists used were not sufficiently detailed in relation to traceability controls which led to superficial results. In addition the competent Authority (CA) controls did not include systemic controls on quantitative traceability (quantities of meat and products thereof and other ingredients, received, used, dispatched and in stock). Verification of the use of additives, enzymes and flavourings was weak and insufficient attention was paid to rework batches.

While the routine CA controls found some non-compliances regarding traceability, labelling and use of additives, they did not detect a number of more serious, systematic deficiencies. In relation to the traceability exercises carried out as part of this audit (14 products selected at retail level), non-compliances were detected in nearly all cases concerning traceability, labelling and/or use of additives. Particular problems were noted where meat/products were moved between establishments belonging of the same group or when traders were involved in the supply chain.

Notwithstanding the above, examples of good practices were seen in one establishment visited, facilitating traceability of products along the production chain.

The report makes a number of recommendations to the Spanish CAs, aimed at rectifying these and other issues identified with a view to enhancing the implementing and control systems in place.

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ABBREVIATIONS AND DEFINITIONS USED IN THIS REPORT

Abbreviation	**Explanation**
AC	Autonomous Communities
AECOSAN	The Spanish Agency for Consumer Affairs, Food Safety and Nutrition (A*gencia Española de Seguridad Alimentaria y Nutrición)*
CA(s)	Competent Authority(ies)
CCA(s)	Central Competent Authority(ies)
COM	European Commission
EU	European Union
FBO(s)	Food Business Operator(s)
FVO	Food and Veterinary Office
HACCP	Hazard Analysis and Critical Control Points
MAGRAMA	Ministry of Agriculture, Food and Environment *(Ministerio de Agricultura, Alimentación y Medio Ambiente)*
MANCP	Multi-Annual National Control Plan
MSM	Mechanically Separated Meat

1 INTRODUCTION

This audit took place in Spain from 26 January to 6 February 2015 as part of the Food and Veterinary Office's (FVO) planned audit programme. The audit team comprised two auditors from the FVO.

The FVO audit team was accompanied throughout the audit by a representative of the Central Competent Authority (CCA), the Spanish Agency for Consume Affairs, Food Safety and Nutrition (AECOSAN - *Agencia Española de Seguridad Alimentaria y Nutrición*), and the representatives from the Competent Authorities (CAs) from the Autonomous Communities (AC) and Municipalities concerned.

An opening meeting was held in Madrid on 26 January 2015 with the CCA. At this meeting the FVO audit team confirmed the objectives of, and itinerary for the first week of the audit, and additional information required for its satisfactory completion was requested.

2 OBJECTIVES AND SCOPE

The objectives of the audit were to:

- evaluate the operation of official controls over the traceability of meat (meat of domestic ungulates, poultry, lagomorphs and game meat), minced meat, mechanically separated meat (MSM), meat preparations, meat products (hereafter referred to as meat and products thereof), and composite products containing meat and products thereof and other ingredients.
- evaluate the implementation of, and official control over, Union legislation on the labelling and identification systems of meat and products thereof.

Particular attention was paid to the following:

- Traceability, labelling and identification systems of meat and products thereof;
- Composite products containing meat and products thereof and traceability of quantities of each ingredient used.

In pursuit of these objectives, the audit itinerary included the following meetings and visits:

Meetings and visits			**comments**
CAs	Central		Initial and final meeting, one clarification meeting (video link)
	Regional	4	Meetings on the sites visited with representatives of the ACs and Municipalities concerned.

	Local		Meetings on the sites visited
Meat product processing establishments		6	Including evaluation of CA controls over production and/or storage of fresh meat, meat preparations, minced meat and/or MSM

3 LEGAL BASIS

The audit was carried out under the general provisions of Union legislation and, in particular, Article 45 of Regulation (EC) No 882/2004 of the European Parliament and of the Council on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules.

Full legal references are provided in section 9. Legal acts quoted in this report refer, where applicable, to the last amended version.

4 BACKGROUND

The FVO carried out a series of audits in certain Member States between 2009 and 2011 in order to evaluate the controls over the traceability of beef and beef products. Another series of audits was conducted in certain Member States between 2011 and 2012 in order to evaluate the official controls related to slaughter and processing of fresh meat, in particular fresh equine meat. Both series of audits resulted in overview reports (reference numbers DG(SANCO)/2012-6624 and 2013-6950 respectively) and are available on the Directorate-General for Health and Food Safety web-site: at:

http://ec.europa.eu/food/fvo/specialreports/overview_search_en.cfm

Recent events, including the horsemeat scandal, have highlighted deficiencies in the control of traceability of meat traded as a commodity on an European Union (EU) wide basis. Weaknesses in food business operators' (FBOs) compliance with their responsibilities and official controls, in particular with regard to traceability systems (qualitative and quantitative) and labelling requirements, were identified in several Member States.

This audit paid attention, in particular, to these areas in targeted food businesses.

5 FINDINGS AND CONCLUSIONS

5.1 COMPETENT AUTHORITIES

Legal requirements

Chapter II of Regulation (EC) No 882/2004.

Findings

1. At the opening meeting both, AECOSAN and the Ministry of Agriculture, Food and Environment (MAGRAMA - *Ministerio de Agricultura, Alimentación y Medio Ambiente*) confirmed that there were no major changes in the structure and organisation of both authorities as described in the country profile for Spain, except the creation of the AECOSAN.

2. The AECOSAN is the CCA in relation to the scope of the audit. The AECOSAN was established in 2014 through the merger of the former Spanish Agency for Food Safety and Nutrition (*Agencia Española de Seguridad Alimentaria y Nutrición*) and the National Consumers Institution. The AECOSAN is assigned to the Ministry of Health, Social Services and Equality, (*Ministerio de Sanidad, Servicios Social e Igualdad,*) through the Secretary General for Health and Consumer Affairs. Competences and responsibility for organising and carrying out official controls are vested in the ACs and in the local authorities, within their respective jurisdictions.

3. The Directorate General Food Industry *(Dirección General de la Industria Alimentaria)* of the MAGRAMA is responsible for controls over possible fraud at any point of the food chain. The controls are carried out by the ACs according to an annual control programme. The co-ordination between the MAGRAMA and the CAs of the ACs is organised through a working group. A communication network has been established between the different parties in order to disseminate information.

4. See footnote[1]

5. A more detailed description of the CA can be found in the country profile for Spain on the following website:

   http://ec.europa.eu/food/fvo/country_profiles/index.cfm

6. The FVO audit team received the following national legislation relevant for the objectives of the audit:
   - The Law 17/2011 of 5 July 2011 on food safety and nutrition forms the basic framework law on food safety. It lays down, among other requirements, rules for traceability and labelling (Article 6) and on the rapid alert system for food (Article

[1] In their response to the draft report the CAs provided clarification and the report was amended accordingly. As a result this paragraph has been deleted.

25). Chapter IX covers sanctions, which comprise the temporary closure of the establishments, suspension of the approval etc.

- The Royal Decree 1698/2003 of 12 December 2003, which lays down rules in relation to traceability and labelling of bovine meat, including minced meat and meat of fighting bulls. Article 7 of this Decree requires the CAs to include controls over traceability of bovine meat and labelling in the annual control plans.
- The Ordinance 12955 of 21 June 2001 of the Ministry of Health and Consumers sets out rules on specified risk material. The ordinance prohibits, for example, the use of bovine, ovine and caprine bones for the production of MSM.
- The Royal decree 474/2014 of 13 June 2014 lays down the national quality criteria for meat preparations and products that are produced in Spain and put on the national market.

7. The FVO audit team received information that a number of guidelines have been established, amongst them:
   - A guideline on traceability for FBOs and CAs - in place since in 2004.
   - A guidance on the use of additives in meat preparations- last revised 29 January 2015.
   - A guidance on the differentiation between meat products and meat preparations regarding the interpretation of Commission Regulation (EU) No 601/2014, which was prepared by the National Association of the Spanish Meat Industries.

Conclusions on Competent Authorities

8. The CAs responsible for official controls in the scope of the audit have been designated in compliance with Article 4(1) of Regulation (EC) No 882/2004. Within the scope of this audit, Union legislation is transposed, where applicable into national legislation.

5.2 OFFICIAL CONTROLS ON TRACEABILITY SYSTEMS, IDENTIFICATION MARKING AND LABELLING

Legal requirements

General requirements on traceability systems, identification marking and labelling are laid down in Regulations (EC) No 178/2002, (EC) No 931/2011, (EC) No 853/2004, (EC) No 854/2004 and (EU) No 1169/2011.

More specific traceability and/or labelling requirements are laid down in Regulations (EC) No 1760/2000, (EC) No 1825/2000, (EC) No 1332/2008, (EC) No 1333/2008 and (EC) No 1334/2008.

Audit findings

5.2.1 Organisation of official controls

9. The organisation and implementation of official controls is also described in the Country Profile for Spain.

10. The multi-annual national control plan (MANCP) 2011-2015 covers official controls of FBOs and over foodstuffs. Section III of the MANCP includes a programme for general hygiene controls, including (among others) controls on traceability and labelling, a programme for the control of systems based on Hazard Analysis and Critical Control Points (HACCP), and 10 control programmes based on the detection of specific hazards in foods by taking official samples for analysis (for example, controls on biological risks, additives and allergens).

11. The official controls in the establishments are carried out following the annual control plan. Based on the established risk analysis profile, official controls are carried out at FBOs at a frequency determined by the CAs of the ACs. Based on the results, official controls may be increased. Additional controls are performed for various reasons such as follow-up of consumer complaints and non-compliances identified during previous inspections.

12. The annual control plan includes audits of the FBOs' HACCP based procedures in place. Controls on traceability should cover one step forward and one step backward. Follow up of non-compliances during HACCP audits typically takes place during the next planned audit rather than during the next official controls. Depending on the infringements and on the AC, a special control unit may be set up to verify implementation of corrective measures.

13. In one AC, the FVO audit team noted that most inspection visits in one establishment visited were planned instead of being unannounced. The CA of the AC stated that visits in large-scale establishments are usually announced in advance. Provided the nature of the control permits and the inspector knows that the presence of a particular member of the business is advisable, visits to large-scale establishments may be arranged according to the CA, at the shortest notice possible.

14. The FVO audit team noted shortcomings in relation to follow-up of deficiencies in some of the establishments visited. For example, in one establishment, the CA had noted shortcomings in relation to traceability and critical control points but these shortcomings had not been followed up during follow-up visits although they were significant. In another establishment visited, no deadlines were given in the control reports seen and although shortcomings had been noted in relation to traceability, the CA had not required any actions to be taken in this respect.

15. The official staff use checklists for inspections and for the HACCP audits and more detailed explanatory documented control procedures are available for the staff. The checklists used for official controls included amongst other topics, labelling and traceability of food. The controls on labelling should comprise checking labelling at FBOs' premises, checking of commercial documents and controls on health and identification marks. In three of the four ACs visited, the CA did not have a special checklist or instructions for checking of additives. Evidence for official sampling on

additives was available in the ACs visited and for some other ACs.

- Checklists were completed and, where applicable, more detailed information was reported in annexed reports. Results of official controls are signed off by and are made available to the FBOs. The results are thereafter entered in the official database. In the establishments visited examples were seen of reduced or increased frequency of controls and ad-hoc inspections.
- The instructions do not require quantitative traceability of foodstuff. In-depth verification of traceability and controls on maximum permissible limits of additives was not performed often.
- With a view to justifying the use of certain additives in meat preparations such as chorizo, one AC informed the FVO audit team that in co-operation with the University, a quick test is being developed to determine if certain meat preparations keep the characteristics of fresh meat or not.

16. In one AC visited, the FVO audit team received detailed information on their 2015 sampling plan for the use of additives. The sampling plan comprises several additives (for example, sulphites, nitrates in meat products, phosphates in hamburger meat, colourants).

17. In one of the four ACs visited the 2013 internal audit programme included audits over official controls of the establishments producing additives and premixes of additives. Reports of the internal audits were provided to the FVO audit team, which included non-compliances and follow-up.

18. The AECOSAN provided the FVO audit team with summary results on controls planned and carried out in 2013 under programme 1, which is concerned with general controls on establishments (including traceability and labelling) at all stages of the food chain. A total of 92 013 official controls (inspections) were carried out across the total number of 54 911 establishments in existence in the meat and meat product sector. At these inspections, 1 397 and 1 595 breaches were detected related to traceability and labelling respectively. The numbers of various types of enforcement actions taken relating to the above shortcomings were 724 and 934, respectively.

19. Evidence of internal audits carried out by the CAs of the ACs on local CAs was available in the ACs visited and examples of audit reports were available.

20. The CAs of the ACs informed the FVO audit team that training covering meat traceability and labelling (for example, on general labelling requirements and on health claims) had been organised at AC level. One AC visited had not organised training on additives.
    - Most of the local CAs met during the audit had participated in training on traceability and labelling. Some of the local CA personnel met who were responsible for the controls in the establishments visited, had not participated in any training on additives, which was, for example, the case in one establishment where significant

non-compliances were identified during this audit on the FBO traceability system in place (see chapter 5.2.2.1).

Conclusions on organisation of official controls

21. The system of official controls is in place as described in the Country Profile for Spain. Within the scope of the audit, the official control plans are implemented as foreseen and official controls are carried out in accordance with documented procedures. Despite systems being in place, there are some shortcomings in their thoroughness and follow-up. Systems for training varied between ACs, with no training on the use of additives being provided in one etc. Some of the deficiencies identified could directly be contributed to insufficient training.

5.2.2 Implementation of official controls

22. During the first day of the visit, the FVO audit team selected some meat and products thereof at retail level. The CA was asked to trace back these 14 samples of meat to the slaughterhouse of origin based on available documentation. Furthermore, the CA was requested to provide documented evidence on the accuracy of the labelling of the goods selected, in relation to ingredients and composition.

23. During the second week, the results of this trace-back exercise were evaluated by the FVO audit team. In sub-section 5.2.2 below, paragraphs 24 to 29 summarise the CA findings and associated FVO observations. In addition, the FVO audit team selected four samples for supplementary, on-the-spot evaluation in the production establishments: the results of these evaluations are provided in paragraphs 30 to 37.

5.2.3 Official controls on food processing chain

24. The CA was able to provide information concerning the tracing to the establishments involved for all 14 samples.

25. The CA concluded for 13 of the samples that they had been produced in compliance with the FBOs' traceability procedures. For one sample, the CA found that the FBOs' traceability system was not reliable despite the latest CA controls as well as controls from an external control body being favourable. The CA initiated corrective actions in this establishment. For one sample, the CA did not identify the use of MSM, which was declared in the FBOs' production records as "BAADER" meat. In addition, the raw meat on the delivery documents was described as minced meat.

26. Thirteen samples were reported as being fully traceable by the CA although the CA had identified, for some of the samples, that there were some missing links in the documentation and/or the absence of traceability records for certain ingredients used. Most commercial documents were compliant with the requirements set out in Regulation (EU) No 931/2011, but in a few cases missing links remained unnoticed. For one of the

thirteen samples, the tracing took some additional time as traders were involved and the product moved between different ACs.

27. The CA reported that 13 samples were quantitatively traceable. However, for a number of samples, the CA had not correlated and verified the amounts produced against the raw material intake, the product recipes, the technical specifications of the additives and spice mixtures used. For some of the samples, technical specifications had been provided, but these had been updated after the actual date of production or were not detailed enough to facilitate calculation of the maximum level of certain additives.

28. The CA identified eight samples as compliant with the labelling requirements. The non-compliances identified by the CA were mainly related to ingredients (not corresponding to the actual use), and missing or wrong information on the use of allergens. For one sample, the CA considered their findings on labelling as inconclusive. The FVO audit team made some additional observations:
    - The label of a sample of burger meat did not mention the name of the species used. The label indicated only "lean" (magro) and "fat" (tocino).
    - One sample of rabbit meat contained voluntary labelling information on feeding and the animal welfare conditions of the rabbits. This information was not verified by the CA. Following the provision of additional information by the CA, it was possible to trace the rabbit meat cuts to the slaughterhouse of origin. This was also the case for another sample of cut lamb meat.

29. In relation to the use of additives, the CA considered that six samples were compliant with requirements. For two samples, additives were not used. For one sample, the CA evaluation was inconclusive as the FBO had not provided sufficient information to determine whether one ingredient should be considered as a technical agent or not. Non-compliances identified by the CA mainly concerned the following of the recipes and/or labelling.
    - The FVO audit team made the following additional observation for one sample (carpaccio). The CA did not receive information from the FBO to indicate that the meat loses the characteristics of fresh meat after marination, which would be necessary for it to be classified as a meat product – this would be necessary to justify the use of nitrates and nitrites. The production establishment is not approved as a meat processing plant, but as a cutting plant and for production of minced meat and meat preparations. The documents provided did not link all steps in the chain: the production records were not reliable as the production dates did not match the entry dates of the raw material used. The labelling was not correct concerning the amount of beef used. The CA could not explain why phosphates (E452) and carrageenan (E407), used as an anti-foaming agent in the brine, were not mentioned on the label.

30. The FVO audit team selected four out of fourteen dossiers on-the-spot, on which the CA had concluded that:
    - In three out of four cases, the food labelling was compliant.
    - In one out of four cases, the FBO's traceability system was not reliable.

- In two out of four cases, additives were not used. For the two other cases, the use of additives was compliant.

31. A number of additional observations were made by the FVO audit team concerning the tracing exercises, which are reported in the paragraphs below.

32. In one out of four cases, the CA had not checked the dispatch documents.

33. See footnote[2]

34. In one out of the four cases, the label indicated that the product was produced from poultry and turkey meat, but it also contained pork meat as a result of rework batches. The rework batches contained certain additives, including additives with a maximum level use, which were not specified from the label. Conversely, the label did indicate that the product could contain certain allergens and these would have originated from the rework batches. These shortcomings had not been noted by the CAs.

35. One of the four cases (a composite product containing meat) had not been verified in depth by the CA. The FVO audit team noted the following additional shortcomings: the FBO had not produced the product in line with updated product recipes; the amount of water used was not recorded and did not support the calculation of the percentages of ingredients used. The FBO did not have product specifications of certain ingredients available in order to justify the labelling of ingredients and additives used.

36. Two different approved establishments belonging to the same group and renting a separate cold store at a third location, with a different approval number, did not sufficiently distinguish the physical flow of the products. Consequently the links in the chain were easily lost.

37. The FVO audit team did not receive the specification of a raw material seen in one establishment visited although this was requested.

Conclusions on the implementation of official controls

38. The results of the traceability exercises conducted indicate that the official controls are partially effective, with the results that some serious and/or systemic deficiencies are not detected and acted upon.

39. The system in place is not well developed or implemented concerning quantitative traceability and controls on the use of additives, enzymes and flavourings.

40. Traceability and the effectiveness of official controls thereon are adversely affected when meat/products are moved between establishments belonging to the same group or where traders are involved in the supply chain.

[2] In their response to the draft report the CAs provided clarification and the report was amended accordingly. As a result this paragraph has been moved to section 5.3 Miscellaneous.

41. The time spent on the CA comprehensive control visits to check compliance with traceability, labelling and additive requirements was insufficient for these controls to be performed effectively.

5.2.3.1 Official controls on FBO's obligations

42. In contrast to the FVO findings during this audit, the results of most planned CA inspection visits did not indicate systemic non-compliances regarding traceability, labelling and use of additives.

43. In one establishment visited, the CA did not identify that the FBOs' traceability system in place was not robust enough to guarantee traceability of meat, additives and other ingredients used. For one product verified, the amount of meat of the batch of origin referred to was not sufficient to cover the entire day's production. Production records were not present for some of the additives and other ingredients used.

44. In a few establishments visited, spices, spice mixes and other ingredients no longer stored in their original packaging, remained unidentified.

45. The FVO audit team observed that in some establishments the flow charts of certain products examined were not up-to-date, specifications of ingredients and additive mixtures were not present or up-to-date. These shortcomings had not been recorded during official controls.

46. In one establishment the CA could not justify based on documentation available that the specific hygiene requirements for the use of MSM as laid down in Regulation (EC) No 853/2004 were followed.

47. For one establishment visited, the CA reaction to a Rapid Alert Notification in June 2014 was delayed (one allergen not specified on the label). The FBO decided to recall the products, but the CA did not follow-up on the destruction of the products recalled. Products from the same establishment were recalled in November 2014 in another Member State (development of mould due to absence of preservatives) and the FBO did not inform the CA. This incident only came to the attention of the CCA and AC following Rapid Alert information in January 2015, which was followed-up by the CA during an on-site inspection.

48. Although the traceability and labelling of cut beef was generally compliant, in one establishment visited, the CA did not identify that the label did not indicate the name and establishment of where secondary cutting took place.

49. The CA control reports for one establishment visited seen by the FVO audit team did not indicate that the commercial documents for frozen poultry carcasses lacked information on the expiry date or lot number and the storage condition.

50. In several establishments visited, the CA had paid insufficient attention to the traceability of rework batches and the verification of labelling used for the products

made therefrom. In one establishment this had led to wrong information on the label for the final consumer.

51. In one establishment visited, based on a complaint by another CA, the FBO sent samples of marinated meat preparations, including chorizo, to an accredited laboratory to provide evidence that the meat preparations had lost the characteristics of fresh meat in order to justify the use of nitrates and nitrites. However, the CA could not provide such evidence for another establishment producing one of the samples of chorizo containing nitrate and nitrite.

Conclusions on official controls on FBO's obligations

52. Insufficient time is allocated for official controls on traceability and labelling.

53. CA inspection visits were not effective in detecting systemic non-compliances regarding traceability, labelling and the use of additives.

5.3 MISCELLANEOUS

5.3.1 General and specific hygiene requirements

54. In two establishments visited, the FVO audit team identified non-compliances related to general and specific hygiene requirements, which had not been recorded in official control reports:
    - In one meat processing establishment visited, there was dirt, rust, flaking paint in different production and storage areas causing a potential risk of contamination of meat. The FVO audit team identified in this establishment that the FBO traceability system was not efficient.
    - In another establishment visited, the flow of products, storage of raw materials and ingredients, the hygienic operation and the cleaning of facilities was not at an acceptable standard. The animal by-product storage area was not under control: containers with animal by-products were stored outdoors at ambient temperatures and were not identified or sealed. In this establishment, the CA identified that the FBO traceability system was not reliable as a result of the sample exercise undertaken.

54(a) In one establishment visited, where the FVO evaluated the results of traceability exercise (one of the four on-the spot evaluations), the CA did not identify that the FBO procedure lacked testing of ready-to-eat products for *Listeria monocytogenes*. While the label stated that the product must be heated before consumption, consumers tend to eat the particular product (duck breast) semi cooked. The FBO had not yet carried out a shelf-life study to justify the expiry date[3].

[3] This paragraph was added in response to the CAs' comments to the draft report.

Conclusions on general and specific hygiene requirements

55. In general, notwithstanding observations in a few establishments, official controls on hygiene were effective.

5.3.2 Best practices

56. The FVO audit team noted the following best practices related to traceability:
    - In one cutting plant, tags with radio-frequency identification were used for electronic identification and tracking of all plastic crates. The system links the raw materials, the intermediate, and the finished and stored products until dispatch.

Conclusions on best practices

57. Examples of good practices were seen in one establishment visited, facilitating traceability of products along the production chain.

6 OVERALL CONCLUSIONS

Within the scope of the audit, the official controls plans are implemented as foreseen and official controls are carried out in accordance with documented procedures. Verification of the FBO's traceability procedures and labelling was carried out as part of HACCP audits, but the checklists used are not sufficiently detailed in relation to traceability controls which led to superficial results. In addition the CA controls did not include systematic controls on quantitative traceability (quantities of meat and products thereof and other ingredients, received, used, dispatched and in stock). Verification of the use of additives, enzymes and flavourings was weak and insufficient attention was paid to rework batches.

While the routine CA controls found some non-compliances regarding traceability, labelling and use of additives, they did not detect a number of more serious, systemic deficiencies. In relation to the traceability exercises carried out as part of this audit (14 products selected at retail level), non-compliances were detected in nearly all cases concerning traceability, labelling and/or use of additives. Particular problems were noted where meat/products was moved between establishments belonging to the same group or when traders were involved in the supply chain.

Notwithstanding the above, examples of good practices were seen in one establishment visited, facilitating traceability of products along the production chain.

7 CLOSING MEETING

A closing meeting was held on 6 February 2015 with the CCA, the AECOSAN and representatives of the CAs of the ACs and Municipalities concerned. At this meeting the FVO audit team presented the main findings and preliminary conclusions of the audit and

advised the CCA of the relevant time limits for the production of the report and their response.

The representatives of the CCA acknowledged the main findings and conclusions presented by the FVO audit team. In addition, information on action already taken and planned in order to address particular findings in the establishment was provided.

8 RECOMMENDATIONS

An action plan describing the action taken or planned in response to the recommendations of this report and setting out a time table to correct the deficiencies found should be presented to the Commission within 25 working days of receipt of the report.

No	Recommendations
1.	To further develop the system of official controls on traceability, labelling and the use of additives so as to meet the requirements set out in Articles 3.1 (risk based frequency of controls) and 8.1 (documented procedures and instructions) and 10 (control methods) of Regulation (EC) No 882/2004. *Recommendation based on conclusions No 21, No 38, No 39, No 40, No 41, No 52 and No 53.* *Associated findings No 13, No 14, No 15, No 50 and No 51.*
2.	To ensure that official controls on Food Business Operators include checks on compliance with the requirements of Article 18 of Regulation (EC) No 178/2002, with regard to traceability, including qualitative and quantitative aspects. *Recommendation based on conclusions No 21, No 38, No 39, No 40 and No 53.* *Associated findings No 15, No 25, No 26, No 27, No 28, No 29, No 32, No 33, No 35, No 42, No 44, No 49 and No 50.*
3.	To ensure that official controls include controls on the use of additives and ingredients in order to ensure compliance with the requirements laid down in Regulations (EC) No 1333/2008 and (EC) No 1334/2008. *Recommendation based on conclusions No 21, No 38, No 39, No 40, No 41 and No 53.* *Associated findings No 15, No 27, No 29, No 35 and No 42.*
4.	To ensure that official controls on Food Business Operators, producing foodstuffs for delivery to the ultimate consumer, include within their scope the relevant labelling requirements for such products laid down in Regulation (EU) No 1169/2011.

	Recommendation based on conclusions No 38 and No 53. *Associated findings No 28, No 29, No 33, No 34, No 35, No 42, No 48, No 49 and No 50.*
5.	To ensure, in line with the requirements of Article 6 of Regulation EC) No 882/2004, that staff carrying out official controls receive appropriate training for carrying out official controls within the scope of this audit, in particular, related to traceability (quantitative and qualitative), labelling and the use of additives. *Recommendation based on conclusion No 21.* *Associated finding No 20.*

ANNEX 1 – LEGAL REFERENCES

Legal Reference	Official Journal	Title
Reg. 1760/2000	OJ L 204, 11.8.2000, p. 1-10	Regulation (EC) No 1760/2000 of the European Parliament and of the Council of 17 July 2000 establishing a system for the identification and registration of bovine animals and regarding the labelling of beef and beef products and repealing Council Regulation (EC) No 820/97
Reg. 1825/2000	OJ L 216, 26.8.2000, p. 8-12	Commission Regulation (EC) No 1825/2000 of 25 August 2000 laying down detailed rules for the application of Regulation (EC) No 1760/2000 of the European Parliament and of the Council as regards the labelling of beef and beef products
Reg. 178/2002	OJ L 31, 1.2.2002, p. 1-24	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
Reg. 852/2004	OJ L 139, 30.4.2004, p. 1, Corrected and re-published in OJ L 226, 25.6.2004, p. 3	Regulation (EC) No 852/2004 of the European Parliament and of the Council of 29 April 2004 on the hygiene of foodstuffs
Reg. 853/2004	OJ L 139, 30.4.2004, p. 55, Corrected and re-published in OJ L 226, 25.6.2004, p. 22	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
Reg. 854/2004	OJ L 139, 30.4.2004, p. 206, Corrected and re-published in OJ L 226, 25.6.2004, p. 83	Regulation (EC) No 854/2004 of the European Parliament and of the Council of 29 April 2004 laying down specific rules for the organisation of official controls on products of animal origin intended for human consumption
Reg. 882/2004	OJ L 165, 30.4.2004, p. 1, Corrected and re-published in OJ L 191, 28.5.2004, p. 1	Regulation (EC) No 882/2004 of the European Parliament and of the Council of 29 April 2004 on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules

Reg. 2073/2005	OJ L 338, 22.12.2005, p. 1-26	Commission Regulation (EC) No 2073/2005 of 15 November 2005 on microbiological criteria for foodstuffs
Reg. 2074/2005	OJ L 338, 22.12.2005, p. 27-59	Commission Regulation (EC) No 2074/2005 of 5 December 2005 laying down implementing measures for certain products under Regulation (EC) No 853/2004 of the European Parliament and of the Council and for the organisation of official controls under Regulation (EC) No 854/2004 of the European Parliament and of the Council and Regulation (EC) No 882/2004 of the European Parliament and of the Council, derogating from Regulation (EC) No 852/2004 of the European Parliament and of the Council and amending Regulations (EC) No 853/2004 and (EC) No 854/2004
Reg. 1332/2008	OJ L 354, 31.12.2008, p. 7-15	Regulation (EC) No 1332/2008 of the European Parliament and of the Council of 16 December 2008 on food enzymes and amending Council Directive 83/417/EEC, Council Regulation (EC) No 1493/1999, Directive 2000/13/EC, Council Directive 2001/112/EC and Regulation (EC) No 258/97
Reg. 1333/2008	OJ L 354, 31.12.2008, p. 16-33	Regulation (EC) No 1333/2008 of the European Parliament and of the Council of 16 December 2008 on food additives
Reg. 1334/2008	OJ L 354, 31.12.2008, p. 34-50	Regulation (EC) No 1334/2008 of the European Parliament and of the Council of 16 December 2008 on flavourings and certain food ingredients with flavouring properties for use in and on foods and amending Council Regulation (EEC) No 1601/91, Regulations (EC) No 2232/96 and (EC) No 110/2008 and Directive 2000/13/EC
Reg. 1162/2009	OJ L 314, 1.12.2009, p. 10–12	Commission Regulation (EC) No 1162/2009 of 30 November 2009 laying down transitional measures for the implementation of Regulations (EC) No 853/2004, (EC) No 854/2004 and (EC) No 882/2004 of the European Parliament and of the Council

Reg. 931/2011	OJ L 242, 20.9.2011, p. 2-3	Commission Implementing Regulation (EU) No 931/2011 of 19 September 2011 on the traceability requirements set by Regulation (EC) No 178/2002 of the European Parliament and of the Council for food of animal origin
Dir. 92/118/EEC	OJ L 62, 15.3.1993, p. 49-68	Council Directive 92/118/EEC of 17 December 1992 laying down animal health and public health requirements governing trade in and imports into the Community of products not subject to the said requirements laid down in specific Community rules referred to in Annex A (I) to Directive 89/662/EEC and, as regards pathogens, to Directive 90/425/EEC
Dir. 96/22/EC	OJ L 125, 23.5.1996, p. 3-9	Council Directive 96/22/EC of 29 April 1996 concerning the prohibition on the use in stockfarming of certain substances having a hormonal or thyrostatic action and of beta-agonists, and repealing Directives 81/602/EEC, 88/146/EEC and 88/299/EEC
Dir. 96/23/EC	OJ L 125, 23.5.1996, p. 10-32	Council Directive 96/23/EC of 29 April 1996 on measures to monitor certain substances and residues thereof in live animals and animal products and repealing Directives 85/358/EEC and 86/469/EEC and Decisions 89/187/EEC and 91/664/EEC
Dir. 96/93/EC	OJ L 13, 16.1.1997, p. 28-30	Council Directive 96/93/EC of 17 December 1996 on the certification of animals and animal products
Dir. 97/78/EC	OJ L 24, 30.1.1998, p. 9-30	Council Directive 97/78/EC of 18 December 1997 laying down the principles governing the organisation of veterinary checks on products entering the Community from third countries
Dir. 98/83/EC	OJ L 330, 5.12.1998, p. 32-54	Council Directive 98/83/EC of 3 November 1998 on the quality of water intended for human consumption

Dir. 2000/13/EC	OJ L 109, 6.5.2000, p. 29-42	Directive 2000/13/EC of the European Parliament and of the Council of 20 March 2000 on the approximation of the laws of the Member States relating to the labelling, presentation and advertising of foodstuffs