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FINAL REPORT OF A MISSION CARRIED OUT IN THE CZECH REPUBLIC FROM 01 SEPTEMBER TO 12 SEPTEMBER 2008 IN ORDER TO EVALUATE THE FOLLOW-UP ACTION TAKEN BY THE COMPETENT AUTHORITIES WITH REGARD TO OFFICIAL CONTROLS RELATED TO THE SAFETY OF FOOD OF ANIMAL ORIGIN, IN PARTICULAR MEAT AND MILK

Please note that factual errors in the draft report have been corrected. A clarification provided by the Competent Authority is given in an endnote.

Executive Summary

This mission was a follow-up to the previous FVO mission to the Czech Republic reference number DG(SANCO)8177/2006 carried out from 24 April to 5 May 2006. The mission team evaluated the follow-up action taken by the competent authorities (CA) with regard to official controls related to the safety of food of animal origin, in particular meat and milk.

The Czech Veterinary Service is well organised and improvements were seen in several areas but some problems remain in particular in relation to the audit, official controls, registration and approval of establishments.

The mission team found that there was progress in the preparation of guidelines implementing the EU hygiene regulations and in the legislative process regarding Decrees. Considerable improvement was seen in identification marking and in the identification of animal by-products.

The Czech Veterinary Service have introduced, in general, a well organised external and internal audit system. However, the different approach for the conduct, follow-up and management of audit hampers the development of a harmonised approach.

The audit of good hygiene practices could not verify that the Food Business Operators (FBOs) apply procedures continuously and properly as laid down in Article 4 of Regulation (EC) No 854/2004, The establishments received high scores on the basis of the audit, however, deficiencies were found by the mission team.

Official controls are carried out regularly but not on a risk basis as laid down in Article 3 of Regulation (EC) No 882/2004. The frequency of official inspections is high; however, not all the shortcomings found by the mission team were identified by the Official Veterinarians (OV) during their inspections.

No changes have been made since the previous mission as the CA has no procedure in place to review the system and verify the effectiveness of official control according to Article 8 of Regulation (EC) No 882/2004.

The official certification in the case of exports to the Russian Federation did not fulfil the provisions laid dawn in Article 30 of Regulation (EC) No 882/2004 as the final certificates were issued without supporting pre-export certificates.

The system of registration and approval of establishment is basically in line with EU requirements. However the conditional approval is not in line with the requirements of Article 31 of Regulation (EC) No 882/2004. The list of wild game collection and examination centres was not updated and the hunting associations operate chillers for wild game collection, however, these are not registered by the CA and do not fulfil the requirements according to Article 4 of Regulation (EC) 853/2004.

Although the general hygiene requirements were largely in line with EU requirements deficiencies were identified in relation to microbiological tests of carcasses and the frequency of microbiological control.

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ABBREVIATIONS & SPECIAL TERMS USED IN THE REPORT

Abbreviation	Explanation
ABP	Animal by-product
AW	Animal Welfare
CA(s)	Competent authority (ies)
CAFIA	Czech Agricultural and Food Inspection Authority (*Státni zemědělská a potravinářská inspekce*)
CCA	Central Competent Authority
CCP	Critical Control Point
CZ	Czech Republic
DVI	District Veterinary Inspectorate
EU	European Union
FBO	Food Business Operator
FVO	Food and Veterinary Office
HACCP	Hazard Analysis and Critical Control Points
MA	Ministry of Agriculture (*Ministerstvo zemědělství*)
OV	Official Veterinarian
RVA	Regional Veterinary Authority
SVA CR	State Veterinary Administration of the Czech Republic (*Státni veterinární správa*)
TBC	Total Bacterial Count
WGCEC	Wild Game Collection and Examination Centre

1 INTRODUCTION

The mission took place in the Czech Republic (CZ) from 1 to 12 September 2008, as part of the planned mission programme of the Food and Veterinary Office (FVO). The mission team comprised 2 FVO inspectors and was accompanied during the whole mission by representatives from the central competent authority (CCA), the State Veterinary Administration of the Czech Republic (SVA CR) (*Státni veterinární správa*) and from the Ministry of Agriculture (MA) (*Ministerstvo zemědělství*).

At the opening meeting, the objectives, itinerary, and reporting procedures were confirmed, and information complementary to that received in the course of the preparation of the mission was requested by the mission team.

2 OBJECTIVES OF THE MISSION

The objectives of the mission were the evaluation of the follow-up action taken by the competent authorities with regard to:

- CA organisation and operation,
- official controls over FBOs' compliance with general and specific rules on the hygiene of food of animal origin,
- the implementation of these rules by FBOs,
- the correct implementation of the chain of certification.

In particular, controls over meat, milk and their products in the framework of Regulations (EC) No 178/2002, No 852/2004, No 853/2004, No 854/2004 and No 882/2004 were subject to the evaluation.

In pursuit of these objectives, the mission itinerary included the following:

Competent authorities			Comments
Competent authorities	Central	√	Opening and closing meeting
	Regional	**4**	Hradec Kralove, Pardubice, Ostrava, Olomouc
	Local	√	District Veterinary Inspection (DVI) and OV in establishments visited, 1 DVI office, 1 Regional Veterinary Authority (RVA) office
Food production/processing / distribution - Activities			
Slaughterhouses		**2**	1 low capacity approved for national market, one medium capacity approved for EU
Cutting plants		**2**	1 combined with meat production, one with cold store
Meat product plant		**1**	with cutting
Minced meat/meat preparations plant		**1**	independent minced meat/meat preparations plant
Milk processing plants		**3**	
Wild game handling establishment		**1**	
Storage establishment		**1**	combined with cutting plant
Holdings		**1**	dairy farm

3 LEGAL BASIS FOR THE MISSION

The mission was carried out under the general provisions of Community legislation and, in particular Article 45 of Regulation (EC) No 882/2004.

A full list of the legal instruments referred to in this report is provided in Annex 1. Legal acts quoted in this report refer, where applicable, to the last amended version.

4 BACKGROUND

The previous FVO mission in the evaluated sectors was carried out from 24 April to 05 May 2006 (ref. number DG(SANCO)/8177/2006) and the following recommendations were made:

1. To finalise the updating of legislation, instructions and guidelines in line with the requirements of the new EU hygiene legislation.
2. To implements the audit system in accordance with Article 4(6) of Council Regulation (EC) No 882/2004.
3. To modify the official control system in line with the requirements of the new EU hygiene legislation.
4. To issue practical instructions to the RVAs in order to harmonise the implementation of Article 3 of Council Regulation (EC) No 854/2004 and Article 31 of Council Regulation (EC) No 882/2004 with regard to approval of food businesses.
5. To ensure that only fully compliant establishments are approved in accordance with Article 3 of Council Regulation (EC) No 854/2004.
6. To ensure that FBOs comply with the general and specific hygiene requirements laid down in Council Regulations (EC) No 852/2004 and 853/2004 respectively.
7. To improve the official controls over the use of identification marks in the approved establishments and in particular ensure that old identification marks are removed from re-usable crates and containers.
8. To adjust the procedures for audit of good hygiene practices and HACCP-based procedures to better reflect serious shortcomings in the final compliance rating.
9. To improve the control of animal identification at slaughterhouse level, to be fully in compliance with Annex I, Section II, Chapter III, point 1 of Council Regulation (EC) No 854/2004.
10. To take the necessary measures to bring the controls and identification of animal by-products in line with Council Regulation (EC) No 1774/2002.

The action plan received in response to the above recommendations provided satisfactory guarantees.

The final report of the FVO mission DG(SANCO)/8177/2006 is available on the following web page:

http://europa.eu.int/comm/food/fs/inspections/index_en.html

5 MAIN FINDINGS

5.1 COMPETENT AUTHORITIES

5.1.1 Designation of competent authorities and operational criteria

There has been no change in the designation of CAs since the previous mission.

5.1.1.1 Co-ordination of competent authorities

Observations

- No changes have been made since the previous mission concerning the co-ordination of the CAs. The SVA CR is the CCA responsible for the organisation, execution and supervision of internal audits and official controls in the meat and milk sector. The Food Authority, as an integral part of the MA, carries out the co-ordination between the different inspection bodies concerning food and feed hygiene.
- An establishment was visited producing meat preparation and tortellini. Tortellini production is under the responsibility of the CAFIA. In this particular case, the SVA CR carried out the official controls and, based on an oral agreement with CAFIA, the SVA CR also supervised tortellini production. However there was only an oral exchange of information on the outcome of audits and inspection.

5.1.1.2 Legal powers

In the response to recommendation 1 of the previous report the CCA indicated that guidelines implementing new legislation have been issued and the legislative process regarding Decrees is in progress.

There is a new Decree No 289/2007, which has cancelled 3 national Decrees transposing the repealed EU Directives, in particular, Decree No. 201/2003 on processing poultry meat, meat of lagomorphs, farmed game meat and wild game meat, Decree No 202/2003 on processing fresh meat, minced meat, meat preparation and meat products and Decree No 203/2003 on processing milk and milk products.

There is a new amendment to the Veterinary Act No. 182/2008. It was published in July 2008 and contains new definitions such as:

- small quantities of primary products,

- trained person involved in hunting.

There is a draft Decree under discussion on retail activities at farm level, giving the

opportunity to process food in small scale establishments.

Observations

- The Guidance Document 1/2006 on the audit of establishments was modified after 1 year in operation. The new Guideline is 1/2007 and the audits on food businesses have taken place according to it.

The CCA stated that reviewing instructions in the Guideline No. 5/2006 on how to proceed with registration and approval of establishments is an ongoing process.

5.1.1.3 Audits of the competent authorities

In recommendation 2 the CCA was requested to implement an audit system as laid down in Article 4(6) of Regulation (EC) No 882/2004. According to the action plan an external company carried out an audit on SVA CR in 2007 and the CCA received a certificate (ISO 9001) which is valid for 3 years. The external body examines and supervises the CCAs' activities and results every year.

This systematic examination also covers the internal audit system where the Department of Internal Audit and Control in SVA CR performs audits on RVAs.(see Endnote)

5.1.1.4 Other criteria

The staffing situation was satisfactory at central and regional level.

Observations

- In remote mountainous areas the RVAs have problems to recruit sufficient numbers of veterinarians especially for inspection tasks.
- The OVs met were experienced and they have access to specific veterinary and laboratory databases to carry out their duties efficiently.

5.1.2 Staff performing official controls

No change has taken place concerning the SVA CR which provides for an annual training plan and conducts general and specific training courses for their staff.

Observations

- The training plan for 2008 was available in the regions visited. Information about the participation of the veterinarians in different courses can be obtained from an IT system at regional level. There are meetings organised according to specific needs and considered as additional training in the regional offices. For these types of meetings, minutes were prepared, distributed and the list of participants was available.
- The veterinarians are in general motivated and they presented up to date knowledge about their tasks, however, some shortcomings were seen during the mission. In one establishment visited, for example, the OV had no knowledge about the

microbiological criteria laid down in Regulation (EC) No 2073/2005.

5.1.3 General obligations with regard to the organisation of official controls

5.1.3.1 Organisation of official controls

In response to recommendation 3 there have been some changes as the RVAs create the plan for official control on the basis of the Multi-Annual National Control Plan (MANCP) and determine the minimum level of official controls depending on the type of establishment. The CCA stated that verification on the spot by SVA CR headquarters is performed.

5.1.3.2 Periodicity and frequency of the official controls

In the CZ there are 14 RVAs and they have the responsibility to organise audits on food businesses as required by Regulation (EC) No 854/2004. The RVAs make plans for this type of audit every year.

In addition the establishments were visited regularly by the OVs of the DVI and the plan for a minimum level of official inspection was provided by the competent RVA according to the MANCP. The district veterinarians can ask for modification and on the basis of their request the frequency of official control may be increased or decreased. However, there is no system to assess risks and the official controls are not carried out on a risk basis.

The mission team was informed that the RVA may increase the inspection frequency on the basis of the audit result, but no evidence of such an increase was seen. Although the dairy establishments visited had been classified differently in the audit, the minimum level of official control was identical (12 per year).

There were more official inspections carried out than the minimum level foreseen in all establishments visited.

The following data was received about the official controls carried out in 2007:

Type of establishment	Planned inspections according to the MANCP	Inspections carried out	Percentage according to the plan **(%)**
Slaughterhouse	2 868	6 534	**271**
Cutting Plant	5 183	20 730	**400**
Cold Store	1 416	3 936	**278**
Plant producing Meat Products	5 421	14 689	**271**
Plant producing Meat Preparations	1 892	8 941	**451**
Dairy plants	1 564	3 607	**228**
Milk product establishments	86	105	**121**

Microbiological testing and other sampling activities were included in the statistics as inspections by the CCA which explains this extremely high performance of official control. There were several cases when the inspection reports focused only on specific issues. In one SH visited the OV produced 4 official inspection reports about different actions in 1 day. In some cases the time period which the OV spent on inspection of the establishment was very short (e.g. 35 minutes).

It was explained that they do not use risk assessment as a term but they have a system. There is a Client database which is part of the Information System of the SVA and was introduced 4 years ago. The new version, which is only 6 months old was meant to generate the frequency of the official control. In one region the document presented from the Client database showed seriously low numbers of official controls carried out this year. It was explained that the document is not reliable because the database mentioned did not work well at that moment. Later another document was provided to the mission team with an acceptable level of official control in the same region.

5.1.3.3 Procedure to review the system

No changes have been made since the previous mission as no procedure is in place to review the system and verify the effectiveness of official control as laid down in Article 8 of Regulation (EC) No 882/2004.

The mission team in the establishments visited did not see evidence of the random official control verification on the spot by SVA CR headquarters. In some cases the OV was accompanied by the head of the DVI and/or RVA to where she or he was assigned to.

5.1.4 Control and verification procedures

5.1.4.1 Procedures on tasks, responsibilities and duties of staff

No changes have been made since the previous FVO mission. The responsibilities and duties of staff carrying out official controls are well defined.

5.1.4.2 Actions following official controls

The OV records the findings in the inspection report. In case of serious deficiencies the operator is immediately informed and asked for corrective actions and the RVA is informed in parallel. According to the national legislation the FBO has 5 days to comment or present his objections. The RVAs initiate the administrative procedures for sanctions using the Veterinary Act as a legal basis.

The veterinary inspector can impose fine on the spot if the amount is less than 10 000 Czech Crown.

5.1.4.3 Verification procedures

Observations

- There is no procedure in place to verify the effectiveness of the official controls.

5.1.5 Reports

The CA draws up reports (protocols) on the official controls and when they are carried out. A copy is provided for the FBO.

Observations

- The reports reviewed have the same structure and contain information about the purpose, time spent, control methods applied, results and, where it is appropriate, the FBO's obligations and actions to remedy the shortcomings.
- During the official inspection the OVs often used check lists and attached them to the report. The animal by-product (ABP) inspections in food producing establishments are carried out quarterly and for this the OVs used a special check list.
- Check lists were not always used and attached for other type of official controls in milk and meat establishments.
- On a farm visited a check list was used which was established and circulated as an aid by the CCA and it was modified according to the specific needs of that area.

5.2 OFFICIAL CERTIFICATION

According to the information provided by the CCA there were no changes in the system of official certification since the previous mission.

Observations

- The mission team evaluated 2 cases of official certification to the Russian Federation. In both cases the certificates did not contain a seal number and the final certificates were issued without supporting pre-export certificates for the ingredients of animal origin produced in other Member States. One consignment was seen that had been detained by the OV as the pre-export certificate was not available. No export certificate had been issued for this consignment.

5.3 REGISTRATION AND APPROVAL OF ESTABLISHMENTS

In response to recommendation 4 the CCA issued the guideline No 5/2006 on approval and registration of food businesses. It was stated that this document is under continuous review.

5.3.1 Registration of establishments

Observations

There are no milk collection centres in the CZ according to the CCA.

It was clarified during the initial meeting that there is no registered game collection centre in CZ.

Hunting associations which operate chillers for wild game carcasses are not registered. No official information about the number of these chillers is available.

5.3.2 Approval of establishments

Observations

- There are 3 categories of food establishments in CZ – conditionally approved, approved only for national market and approved for the EU. The establishments approved for the national market can be upgraded, closed or can operate in the retail sector.
- In case of one low capacity slaughterhouse visited the FBO planned to construct a butcher shop on the same site and continue as a retail business after 31 December 2009. The CCA however explained that a slaughterhouse must be always approved and cannot operate as a retail shop for which only registration is required. The CCA also mentioned that in the case of cutting plants if the capacity is less than 5 tonnes per week the cutting plant is regarded as a retail shop.
- The following data was received from the CCA:
    - In CZ there are 1 417 establishments approved for EU, 41 approved conditionally and 773 which were approved only for national market.
    - From the 41 conditionally approved establishments 1 has been approved since 2006, 6 since 2007 and 4 in 2008, which have been in this status for more than 6 months. This type of approval is not in line with Article 31 2(d) of Regulation (EC) No 882/2004.
- During the final meeting the CCA handed over an updated list consisting of only 27 conditionally approved establishments. Ten copies of approvals were attached to

this list. On the new list 1 establishment was conditionally approved for more than 6 month and 1 for exactly 6 months. Five establishments from the first list were not on the second one and a copy of their approval was not attached either.

- According to the CCA all the high capacity establishments are EU approved and have been audited at least once.
- One of the establishments visited producing foodstuffs from already processed food of animal origin was approved as a dairy plant as the FBO intended to export to third countries. The relevant requirements for approved establishments were taken into account by the CA.
- One dairy establishment visited carried out activities as a cold store for third parties despite the fact that it was not approved for this activity. According to the CCA any establishments with cold storage activities for its own production could also carry out this activity for third parties without specific approval for cold storage.
- One meat preparation establishment was approved for blast freezing activities although this activity took place in a different establishment, belonging to the same FBO, but registered by CAFIA.
- An EU approved wild game processing establishment was supplied with carcasses by 4 Wild Game Collection and Examination Centres (WGCECs). Three out of the 4 WGCECs had been approved in 2003 on the basis of repealed EU legislation. None of the 4 WGCECs was on the list of approved WGCECs presented by the CCA.

5.3.3 National measures and derogations

Observations

- The CA informed the mission team that national legislation was being prepared setting the requirements applicable to dairy farms processing their own milk, producing small quantities of fermented products and selling them directly to the final consumer. At the time of the mission, the definition of "small quantities" was still under discussion. This legislation has not been finalised yet and the CCA stated that it may be applicable from the end of this year.

5.4 APPLICATION OF HYGIENE RULES AT ESTABLISHMENT LEVEL AND OFFICIAL CONTROLS

5.4.1 Food business operators' obligations

5.4.1.1 General hygiene requirements

Observations

- Most of the establishments visited presented an acceptable level of general hygiene

and largely complied with requirements as set out in Regulation (EC) No 852/2004. They have in principle satisfactory structures. With some exceptions, maintenance and cleanliness were satisfactory.

- Old identification marks from re-usable crates and containers were usually removed.
- The mission team found improvement and progress in the field of identification of ABPs. Containers for ABP were clearly marked and labelled for different categories.
- Pest and insects control in the establishments visited was in place but was not always satisfactory. In 2 cases the bait stations were damaged or empty, insects were found inside the building.
- A potable water check was carried out in accredited laboratories according to national legislation. The samples were not always tested for all parameters as is laid down in Council Directive 98/83/EC. In 1 establishment the health authority took samples twice in the kitchen of the social part and only 1 microbiological sample was taken from the production area by the FBO. In 1 region the sampling plans were available and the samples were taken in the production area largely according to the Directive mentioned.
- The main part of the activities was abandoned in one of the dairy establishments visited and only one part of the premises continued the operations. The physical separation on-the-spot between the part of the premises covered by the approval document and the abandoned part was not clear.
- Pallets coming directly from the ingredient's storage room were kept in the production area in 1 of the dairy establishments visited.
- In 1 dairy establishment visited, ingredients with an expired use by date of several months were used in the production. The FBO extended their validity on the basis of microbiological analyses carried out in its own laboratory. In this establishment, the same policy was applied to ingredients with elapsed best before date. The OV was aware of this practice.
- Microbiological testing was carried out in accordance with Regulation (EC) No 2073/2005 in the dairy establishments.
- In the slaughterhouses, cutting plants, establishments producing meat product and meat preparation visited the microbiological programmes were in place, however in both slaughterhouses visited the microbiological tests of carcasses were not in line with Regulation (EC) No 2073/2005.
- The sampling frequency was reduced because of the low production level and the reduced frequency continued while the production increased in 1 slaughterhouse. The documentation relating to 6 weeks consecutive results before the reduction of sampling frequency was not available. In some cases the test results were evaluated by the laboratory.
- In the second establishment the frequency of testing and the analyses were not in line with Regulation (EC) No 2073/2005.

- The meat preparations were not subject to microbiological testing in 1 slaughterhouse with multiple activities.

5.4.1.2 Specific requirements

In the majority of the establishments visited no serious shortcomings were found in relation to specific hygiene requirements. However in 5 establishments, some significant deficiencies were detected by the mission team.

Observations

In 1 of the dairy establishments visited, the FBO was not aware of the animal health status of the 3 holdings located in 2 neighbouring Member States delivering raw milk to its establishment. The lack of this information had not been noted by the OV responsible for the establishment. According to the CA, this type of information is not required. However, the CA contacted the authorities of 1 of the countries, who send an official animal health statement of the two farms located in their territory, and found an animal health status statement in the accompanying documents of each individual consignment from the other country.

- Workers crossed from the dirty area to the clean part and *vice versa* in one slaughterhouse visited. In the slaughter line there was no disinfection of saws and knives were used without disinfection. The carcasses in the chiller were visibly contaminated with bristles, dirt from the skin and faecal particles in 1 slaughterhouse.

5.4.1.3 HACCP based systems

Observations

- In general HACCP systems and documentation were available and implemented in the establishments visited.
- However, in 1 slaughterhouse with multiple activities, the CCPs were set up only in places where the temperature has to be under control. In addition according to the HACCP programme the temperature of the product (for example salami pizza) has to be controlled, however, the temperature has never been measured or documented.
- In 1 meat preparation establishment the FBO applied time separation between the processing of vegetable origin products and blast freezing of packed meat but the HACCP procedure did not include any information about this time separation.

5.4.1.4 Identification marking

Observations

- In 1 dairy establishment milk powder in bags from another dairy plant did not bear an identification mark. The CCA took immediate action and contacted the dairy plant of origin to confirm the suitability of this milk powder for human consumption.

5.4.1.5 Traceability and labelling

Observations

- In 1slaughterhouse visited with multiple activities, there was no traceability system in place; only a few production records were kept by the FBO and mistakes in this data were detected by the mission team.
- Deficiencies in the traceability system were noted by the mission team in 1 meat products establishment visited. The FBO remarked that a computerised traceability system was to be implemented in the near future.
- In 1 dairy establishment visited, lactose produced in October 2007 was labelled with a production date of August 2008, which was the date when the product was packed after being 9 months in storage. The CCA declared that the national legislation considers packing as one of the steps of the production chain, therefore this kind of practice is allowed in the country.

5.4.2 Official controls at establishments for verification of food business operators' compliance

- The official controls were carried out and documented. The findings were communicated to the FBO who was requested to correct deficiencies. In some cases follow-up inspections were not carried out or were left until the next regular inspection.

5.4.2.1 Audits of good hygiene practices and HACCP-based procedures

Observations

- With 1 exception all the establishments visited have been audited since 2006. The CCA informed the mission team that the wild game establishments are audited on the same basis as the red meat establishments.
- The guidance document was modified in 2007 and the mission team found 2 different systems.
- In 2006 different types of check lists were used for auditing the establishments and in most cases they were classified into category 2 (suitable). In the next report of the audit carried out in 2007 there was usually no remark about the rectification of problems found in 2006.
- In this modified guidance document the establishments are classified into 4 categories: very good; good; good with additional needs for an official check; and bad.
- The auditors were always from the same region, although at least one auditor from a different district was involved. The report was always prepared and the check list was attached to it.
- The audit team always sent the report to the FBO. In one region the FBOs were informed about the result of the audit first by a hand written summary of the

deficiencies. Without any written procedure they had to present an action plan within 1 month.

- The follow-up inspections were not always carried out.
- In the 4 regions visited the mission team identified several shortcomings related to the use of expired products, deficiencies in HACCP and microbiological testing which were not identified by the audit team. In general the establishments received high scores in spite of the problems revealed. The establishments' classification was not always consistent as some of them received high scores but were not classified accordingly.
- The result of the audit had no influence on the frequency of the official control.
- The CA audits did not address any of the deficiencies in relation to the application of Regulation (EC) No 2073/2005 (see section 5.4.1.1).

5.4.2.2 Controls over the application of identification marks

Observation

- Considerable improvements were seen in the removal of old identification marks from re-usable crates and containers.

5.4.2.3 Verification of traceability requirements

Observations

- The traceability system was not always checked and verified by the OV in one slaughterhouse and meat products establishment. See also point 5.4.1.5.

5.4.3 Official inspection tasks in establishments

- According to the information received from the CCA food chain information has to be provided for all types of animals being sent for slaughter.

5.4.3.1 Ante-mortem inspection and Post-mortem inspection

Observations

- Animals arriving at the slaughterhouses visited were accompanied by food chain information. This document was available and was checked by the OV before slaughter. No problem of identification of animals was seen in the 2 slaughterhouses visited. The OV cross checked illegible tattoos after scalding.
- Post-mortem examination of pig spleens was not carried out in 1 slaughterhouse visited.
- In the case of wild game the post-mortem examination is carried out partly in a wild game collection and examination centre and completed after the dehiding process in a wild game processing establishment.

5.4.3.2 Health marking

Observations

- In 1 slaughterhouse visited the health mark was applied before the result of the *Trichinella* test become available and the release form for carcasses was completed without documented *Trichinella* test result. No procedure was established to prevent loading of carcasses before the result of *Trichinella* testing became available.
- In a wild game processing establishment the OV accepted an oval stamp on a declaration form accompanying the wild game carcasses, although the post-mortem examination was not finalised. The OV had information about the validity of these oval stamps and the approval situation only by phone and by consulting with a web site. On the web site up-dated information was not available during the FVO visit. See also point 5.3.2.

5.4.3.3 Animal welfare at the time of slaughter or killing

Observations

- In 1 slaughterhouse visited the stunning equipment control panel was not checked during stunning. It was difficult to see the screen and there was no audible device to indicate the length of time of its application to an animal as required by Council Directive 93/119/EC (Annex C, Point 3, A.2 (b)).

5.4.3.4 Criteria for raw milk

Observations

- Hygiene during milking was inspected in milking holdings by OV at least once per year according to the minimum frequency established. The use of a specific checklist prepared at central level during official controls was optional. In the dairy farm visited the check list was used, updated and modified according to the particular needs.
- In the dairy establishments visited criteria for raw milk was tested in accordance with the legislative requirements.

5.4.4 Action in case of non-compliance

Observations

- In the RVA office visited documentation about sanctions are kept on a separate file. Some examples were presented in relation to sanction imposed, for example, insufficient surface testing or slaughtering of a pregnant sow.

6 CONCLUSIONS

The Czech Veterinary Service is well organised and improvements were seen in several

areas. Some problems remain unsolved, in particular, in relation to the audit, official controls, registration and approval of establishments.

6.1 COMPETENT AUTHORITIES

The internal audits of the SVA CR did not address that the RVAs have different approaches for conduct, follow-up and management of audit of establishments and moreover all auditors on the RVA team are from the same region, which can hamper the development of a harmonised approach.

The procedures and demonstration taken for audits in the framework of Regulation (EC) No 854/2004 did not include all aspects of Article 4 of this Regulation and the audit of good hygiene practices could not verify that the FBOs apply procedures continuously and properly as required by Article 4 of Regulation (EC) No 854/2004. On the basis of the audit, the establishments received high scores, although deficiencies were found by the mission team.

Official controls are carried out regularly but not on a risk basis as laid down in Article 3 of Regulation (EC) No 882/2004. The inspection frequency is high; however not all the shortcomings found by the mission team were identified by the OV during their inspections.

No changes have been made since the previous mission as the CA has no procedure in place to review the system and to verify the effectiveness of official controls according to Article 8 of Regulation (EC) No 882/2004.

6.2 OFFICIAL CERTIFICATION

The official certification in the case of exports to the Russian Federation did not fulfil the provisions laid down in the Memorandum on veterinary certification of animals and animal products to be exported from the EC to Russia and Article 30 of Regulation (EC) No 882/2004.

6.3 REGISTRATION AND APPROVAL OF ESTABLISHMENTS

Conditional approval is not in line with the requirements of Article 31 of Regulation (EC) No 882/2004.

The list of wild game collection and examination centres were not updated as it is required by Article 31 (2) (f) of Regulation (EC) No 882/2004.

Hunting associations operate chillers for wild game collection however these are not registered by the CA according to Article 4 of Regulation (EC) 853/2004.

6.4 APPLICATION OF HYGIENE RULES AT ESTABLISHMENT LEVEL AND OFFICIAL CONTROLS

Microbiological tests of carcasses and the frequency of microbiological control were not carried out in the slaughterhouses visited according to Regulation (EC) No 2073/2005.

6.5 OVERALL CONCLUSION

The competent authority of the Czech Republic has responded satisfactorily to all the recommendations of the previous report. Action was taken with satisfactory results for 5 of the 10 recommendations. However, shortcomings remained with regard to registration and approval of establishments and official controls.

7 CLOSING MEETING

A closing meeting was held on 12 September with the representatives of the CCA, during which the mission team presented its initial findings.

The CCA were of the opinion that the expired products found in the dairy establishment are considered as stable products therefore the information contained on the label should be “best before date” and not “use by date”.

The CCA stated that the blast freezing activity was under the supervision of the veterinary service, however, documentation to this effect was not presented.

The CCA clarified that the significance of the oval stamp on the declaration accompanying the wild game carcasses is to confirm that *Trichinella* testing has been completed.

The CCA provided a new list of conditionally approved establishments.

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, and a description of the actions taken to correct the deficiencies found should be presented to the Commission within 25 working days of receipt of the report.

No.	Recommendation
1	To adjust the procedure for the audit of good hygiene practices and HACCP based on procedures to detect serious shortcomings. To reflect in the final compliance rate the actual situation and to take all aspects into account according to Article 4 of Regulation (EC) No 854/2004.
2	To ensure that official controls are carried out on a risk basis and with appropriate frequency in accordance with Article 3 of Regulation (EC) No 882/2004.
3	To have procedures in place to verify the effectiveness of official controls in accordance with Article 8 of Regulation (EC) No 882/2004.
4	To ensure that official certification is accurate and authentic as required by Article 30 of Regulation (EC) No 882/2004.
5	To review establishments currently conditionally approved in line with Article 31 of Regulation (EC) No 882/2004.

No.	Recommendation
6	To maintain up-to-date lists of approved establishments and make them available as required by Article 31 (2) (f) of Regulation (EC) No 882/2004.
7	To implement Article 4 of Regulation (EC) No 853/2004 with regard to registration of food businesses in particular the wild game collection centres.
8	To take the necessary measures to bring the microbiological controls fully in line with Regulation (EC) No 2073/2005.

The competent authority's response to the recommendations can be found at:

http://ec.europa.eu/food/fvo/ap/ap_the_czech_republic_7939_2008.pdf

9 ENDNOTES

Concerning	Detail
Section 5.1.1.3	In their response to the draft report, the Czech CCA noted that the review of the audit system is provided by the new methodical instruction issued by the SVA CR regarding audit procedures.

ANNEX 1 - LIST OF LEGISLATION REFERENCED IN THE REPORT

Reference	OJ Ref.	Detail
Directive 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
Directive 93/119/EC	OJ L 340, 31.12.1993, p. 21–34	Council Directive 93/119/EC of 22 December 1993 on the protection of animals at the time of slaughter or killing
Directive 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
Directive 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
Directive 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
Directive 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
Regulation (EC) No 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
Regulation	OJ L 338,	Commission Regulation (EC) No 2075/2005 of 5

Reference	OJ Ref.	Detail
(EC) No 2075/2005	22.12.2005, p. 60–82	December 2005 laying down specific rules on official controls for Trichinella in meat
Regulation (EC) No 2076/2005	OJ L 338, 22.12.2005, p. 83–88	Commission Regulation (EC) No 2076/2005 of 5 December 2005 laying down transitional arrangements 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 and amending Regulations (EC) No 853/2004 and (EC) No 854/2004
Regulation (EC) No 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
Regulation (EC) No 1774/2002	OJ L 273, 10.10.2002, p. 1–95	Regulation (EC) No 1774/2002 of the European Parliament and of the Council of 3 October 2002 laying down health rules concerning animal by-products not intended for human consumption
Regulation (EC) No 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
Regulation (EC) No 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
Regulation (EC) No 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

Reference	OJ Ref.	Detail
Regulation (EC) No 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
Regulation (EC) No 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