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EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR HEALTH AND FOOD SAFETY

Health and Food Audits and Analysis

DG(SANTE) 2024-8030

# FINAL REPORT OF AN AUDIT OF BULGARIA CARRIED OUT FROM 27 MAY TO 11 JUNE 2024 IN ORDER TO EVALUATE THE CONTROL SYSTEMS IN PLACE GOVERNING SLAUGHTER HYGIENE AND MEAT INSPECTION REQUIREMENTS

***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***

*This report describes the outcome of an audit carried out in Bulgaria by the Directorate-General for Health and Food Safety from 27 May to 11 June 2024. The objective of the audit was to evaluate the operation of official controls and the enforcement of the applicable European Union requirements on slaughter hygiene and meat inspection for bovine, ovine, porcine and poultry.*

*The audit found that the structure and organisation of the Competent Authority are adequate and provide a suitable basis for the performance of its tasks in the areas covered by this audit.*

*The official control system for the production of red meat and poultry meat comprises almost all the elements laid down in EU legislation. However, its effectiveness is seriously compromised because the detection and/or recording of non-compliances during the official controls is limited, the enforcement measures taken when non-compliances are detected are also limited, there is a lack of documented procedures/instructions for the staff performing the official controls and, in addition, some official tasks are not carried out in accordance with EU rules.*

*Although mechanisms are in place to provide assurances on the effectiveness of the official controls, they do not work properly as they do not detect some shortcomings in the performance of official controls or, when they do, they do not take appropriate measures to correct them.*

*The report contains recommendations to the central competent authority to address the shortcomings identified.*

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**ABBREVIATIONS AND DEFINITIONS USED IN THIS REPORT**

| **Abbreviation** | **Explanation** |
|---|---|
| AMI | *Ante-mortem* inspection |
| BFSA | Bulgarian Food Safety Agency |
| CA(s) | Competent Authority(ies) |
| CCA | Central Competent Authority |
| DG Health and Food Safety | Directorate-General for Health and Food Safety of the European Commission |
| DG VOC | Directorate General for Verification of Official Controls |
| EU | European Union |
| FBO(s) | Food Business Operator(s) |
| FCI | Food Chain Information |
| HACCP | Hazard Analysis and Critical Control Point |
| MANCP | Multi-annual national control plan |
| OA(s) | Official Auxiliary(es) |
| OV(s) | Official Veterinarian(s) |
| PMI | *Post-mortem* inspection |
| RFSD | Regional Food Safety Directorates |

# 1 INTRODUCTION

The audit took place from 27 May to 11 June 2024 as part of the work programme of the European Commission's Directorate-General for Health and Food Safety (DG Health and Food Safety) and included remote meetings via videoconference as well as on-site visits. The audit team comprised two auditors from DG Health and Food Safety and was accompanied throughout the audit by representatives of the central competent authority (CCA), the Bulgarian Food Safety Agency (BFSA). In addition, representatives of the Regional Food Safety Directorates (RFSDs) involved in the control systems accompanied the audit team during the relevant parts of the audit.

An opening meeting was held remotely with the CCA and regional representatives on 27 May. At this meeting, the audit team confirmed the objectives and scope of, and itinerary for, the audit, and additional information required for the satisfactory completion of the audit was requested.

# 2 OBJECTIVES AND SCOPE

The main objective of the audit was to evaluate the operation of official controls and the enforcement of the applicable European Union (EU) requirements on slaughter hygiene and meat inspection for bovine, ovine, porcine and poultry.

In terms of scope, the audit covered:

- the organisation and competencies of the competent authorities (CAs), including oversight and enforcement, related to the official controls at establishment level.
- the CAs' performance in terms of the design and on-the-ground implementation of the official control systems covering the production, of beef, sheep meat, pork (hereinafter named as red meat) and poultry meat.

This included the gathering of relevant information and verification, as appropriate, by means of interviews/discussions, review of documents and records, and on-the-spot visits.

The table below lists the sites visited and the meetings held, in order to achieve the above-mentioned objective:

| COMPETENT AUTHORITY | | |
|---|---|---|
| Central | 4 | Opening, closing and other technical meetings, via videoconference. |
| Regional | 6 | With officials from 4 regions (2 videoconferences and 4 on-site meetings at the slaughterhouses). |
| Local | 4 | With official veterinarians (OVs) performing their duties in slaughterhouses. |
| FOOD BUSINESS ESTABLISHMENTS | | |

| | | |
|---|---|---|
| Slaughterhouses | 4 | Three medium/small capacity establishments slaughtering cattle and pigs and one large/medium capacity slaughtering poultry |

## 3 Legal Basis

The audit was carried out under the general provisions of EU legislation and, in particular Articles 116, 117 and 119 of Regulation (EU) 2017/625 of the European Parliament and of the Council (Official Controls Regulation).

EU legislation ([1]) relevant to the audit is listed in the Annex to this report.

## 4 Background

This audit took place in the context of the enactment of Regulation (EU) 2017/625, Commission Delegated Regulation (EU) 2019/624 and Commission Implementing Regulation (EU) 2019/627 and is part of a series of audits that DG Health and Food Safety initiated with the aim to assess the performance of the CAs in the area of official controls at slaughterhouse level. After several years where the focus was on bovine meat, this has now been extended to cover pigs, sheep, and poultry species.

The table below indicates the number of cattle, sheep and goats, pigs and poultry slaughtered in Bulgaria during the previous years, according to data provided by the CCA:

| YEAR | CATTLE | SHEEP and GOATS | PIGS | POULTRY |
|---|---|---|---|---|
| **2022** | 36,094 | 158,368 | 1232,520 | 66,423,668 |
| **2023** | 34,597 | 159,516 | 1208,435 | 60,031,987 |

## 5 Findings and Conclusions

### 5.1 Legislation and implementing measures

**Legal requirements**

Article 291(1) of the Treaty on the Functioning of the European Union and Article 1(3)(d) and (4) of Regulation (EC) No 853/2004 of the European Parliament and of the Council.

Article 5(1)(g) and (h) and Article 18(1) of Regulation (EU) 2017/625.

([1]) EU legal texts quoted in this document refer to the last amended version.

**Findings**

1. National legislation related to the sector audited is in place and covers the relevant controls related to the production of red and poultry meat. Of particular importance is the Agricultural Food Chain Management Act, in force since 20 June 2020, that establishes the BFSA as the CA responsible for the performance of official controls on, amongst others, meat establishments and slaughterhouses. This Act also defines the official tasks of the CA and the different responsibilities for each of the government levels.

2. The CCA has not issued instructions or standard procedures covering the technical aspects within the scope of this audit. For the official controls at slaughterhouses, there are no guidance/instructions on *ante-mortem* inspections (AMI), on animal welfare controls and on the verification of food business operators' (FBOs) self-control systems. The current instructions on *post-mortem* inspection (PMI), have not been updated to take into account the last changes in EU legislation. During the visits at the slaughterhouses the audit team noted that the official controls were not effective and there is no consistency in the way they are carried out (see paragraphs 28, 30, 33, 36, 38, 45, 50 and 52).

3. The CCA informed the audit team that national legislation is in place adapting the specific hygiene requirements laid down in Annex III to Regulation (EC) No 853/2004 for slaughterhouses attached to farms with seasonal activity (e.g. during the Easter period). These measures have been notified to Commission and the Member States. According to the data provided by the CCA, of the 109 red meat approved slaughterhouses in the country, there are 26 establishments that apply these derogations.

**Conclusions on legislation and implementing measures.**

4. The official control system is supported by national legislation covering the relevant aspects within the scope of the audit. However, the absence of guidance documents/instructions for the official staff compromises the guarantees that official controls are effective and are carried out in a uniform and consistent way.

5. A number of slaughterhouses make use of the flexibility arrangements (adaptations) provided for in Regulation (EC) No 853/2004 and, in line with EU legislation, the applicable rules have been notified to the relevant Commission services.

## 5.2 COMPETENT AUTHORITIES

**Legal requirements**

Articles 4, 5, 6, 9, 12, 138 and 139 of Regulation (EU) 2017/625.

Article 13 of Regulation (EU) 2019/624.

**Findings**

*5.2.1 Structure and organisation*

6. An overview of how control systems are organised is provided in the Multi-annual National Control Plan (MANCP) of Bulgaria which can be found under the 'Member State Links' tab on the following web page: [https://ec.europa.eu/food/audits-analysis/country/profile/details/BG](https://ec.europa.eu/food/audits-analysis/country/profile/details/BG)

7. The CA operates at two levels: a central level, represented by the BFSA headquarters, and a regional level, represented by the 28 RFSDs. The latter are responsible for the planning and implementation of official controls, the training of their staff and the approval of establishments.

8. It is the CCA's responsibility to provide, through its different directorates, methodological support and guidance to the RFSDs and perform internal audits for the verification of the official controls. The CCA does not engage in official controls and activities related with the approval of food business establishments. They play a role in official controls in case of unplanned events, such as RASFF notifications.

*5.2.2 Impartiality, freedom from conflict of interest,*

9. The Agricultural Food Chain Management Act provides the necessary powers to the CA to carry out the official controls along the entire chain of meat production.

10. Specific measures regarding independence and conflict of interest, are laid down in the Law on Conflict of Interest and the Law on the Civil Service and are described in the MANCP. No official control tasks have been delegated.

*5.2.3 Staffing and equipment.*

11. According to information provided by the CA, the staffing numbers are adequate for the implementation of official controls. The audit team noted that all the establishments visited had a sufficient number of OVs present to carry out the official controls as intended. In Bulgaria, in total, 6 official auxiliaries (OAs) work in poultry slaughterhouses supporting the OVs.

12. The CCA informed the audit team that several checklists are available for use by the OVs during official controls. The audit team noted that the checklists have not been updated since 2014 and they are not usually used by the OVs during their controls. The audit team assessed one checklist for official controls in poultry slaughterhouses and noted that it mainly reported the requirements laid down in Regulations (EC) Nos 853/2004 and 854/2004 and did not provide technical assistance to the OVs.

*5.2.4 Training*

13. The BFSA organises trainings for officials at central and regional level. Additional training sessions are also organised by the regional level, and regular information-sharing

meetings are held once or twice per year. According to the information provided by the BFSA and the RFSDs visited, several trainings were organised the last three years including sessions on meat inspection, official controls and animal welfare controls in slaughterhouses.

14. The audit team noted during the on-the-spot visits that the officials did not have a sufficient level of knowledge of specific legal requirements to perform their duties properly, in particular concerning PMI, hazard analysis and critical control point (HACCP) systems and the protection of animals at the time of killing (see also paragraphs 33, 36, 38, 48, 49 and 50).

*5.2.5 Supervision and audits*

15. Within the RFSDs, there are food safety departments. The heads of these departments are responsible for verifying the OVs' performance at the slaughterhouses. This verification includes on-the-spot visits during which, an assessment of the establishments' conditions is also carried out. Following the verification and assessment a report, with the outcome, must be prepared. Evidence of these reports were seen by the audit team during the on-the-spot visits.

16. At the beginning of 2024 there was a reorganisation within BFSA. The Directorate General for verification of official controls (DG VOC), that performed internal audits and supervisory controls over the work of RFSDs, was replaced by the Directorate for Audits of Official Controls. This new Directorate, under the authority of the executive director of the BFSA and reporting directly to him, is now responsible to carry out commodity specific audits to RFSDs on the basis of a risk-based multi-annual programme. The supervisory controls over the work of RFSDs are planned to be repeated in the future directly by the food department of the BSFA.

17. The audit team was informed that between 2021 and 2023 four internal audits on official controls at meat establishments (including slaughterhouses) were carried out in four RFSDs. The audit reports seen were, in general, well-structured, detailed and provided a clear description of the issues identified, including the non-compliances and weaknesses in the implementation of official controls and the performance of OVs/regional inspectors. According to these reports the most common non-compliances found were the non-detection and/or recording of non-compliances by regional inspectors and the lack of adequate enforcement measures.

18. The audit reports were communicated to the RFSD concerned, which should develop an action plan with the corrective actions to be implemented for addressing the issues identified. The executive director of BFSA is responsible for the enforcement of these actions. The CAs explained that further follow up visits in the RFSDs where problems were noted were also planned. At the time of this audit the visits had not taken place yet. The CAs also stated that the conclusions from the audits carried out were also communicated to the rest of the RFSDs in order to draw their attention to the systemic issues iden-

tified. However, the audit team noted in the four regions visited, that were not audited by the BFSA, non-compliances similar to the ones described in paragraph 17.

*5.2.6 Enforcement*

19. There is legislation and procedures in place for taking enforcement actions when non-compliances are identified by the CA. The OV has the legal power to apply different enforcement measures, depending on the severity of the issues detected. The OVs showed, in general, a good knowledge of the enforcement system and of the different options available to them. In the establishments visited, the audit team had the opportunity to examinate the few cases of the enforcement actions that had been recorded.

20. In some of the establishments visited, the audit team identified a significant number of longstanding non-compliances that had not been previously identified or recorded neither by the OVs during their daily presence nor by the RFSD during their inspections (see paragraph 15) and therefore no enforcement measures had been applied to resolve them. In particular, in one slaughterhouse that the audit team selected, serious non-compliances as regards the sanitary and maintenance conditions were observed. The OVs and the RFSD inspectors responsible for the controls at this establishment explained that they had also detected some of these problems in the past. However, they did not record them in the reports. The OVs added that, in some cases, they had verbally requested the FBO to repair certain parts of the establishment (e.g. the lairage). Despite that, the FBO took no action to resolve the non-compliances observed, the OVs did not impose subsequent enforcement actions and, as a result, the situation remained unchanged.

21. In the same establishment above-mentioned, the FBO refused to facilitate access to the audit team and CAs to three locked chilling rooms, two of them directly connected to the slaughter area. The OVs that were permanently present in the establishment for the last 4 months had no access to these parts of the premises. The OVs did not consider this situation could be an issue as the FBO told them that these chilling rooms did not belong to the approved part of the establishment and, therefore, had been locked. The CA managed to get access to one of the chilling rooms, breaking the lock, in the presence of the audit team. This was a cold store where large quantities of frozen meat/meat products (aprox. 10 tonnes) were stored in a way which rendered the meat and products unfit for human consumption. The other two chilling rooms were opened when the audit team was not present (i.e. during lunch time). When the team came back to the slaughterhouse, got access to the rooms and found that one was empty and, the other one was filled with transport cages. In relation to that establishment, and subsequent to the audit team visit, the CA committed to applying enforcement actions. Evidence of the actions taken were provided to the audit team before the end of the audit (condemnation of the meat in question and temporary suspension of this establishment's activities).

**Conclusions on competent authorities**

22. The official control system includes a clear designation, structure and organisation of the CAs responsible for the official controls that provides a suitable basis for the CA to deliver adequate controls in the areas within the scope of this audit. There is a sufficient number of official staff that have the legal power and authority to carry out official controls. Legislation is in place to provide assurances that official staff are free from any conflict of interest.

23. A training system is in place however the findings of this audit indicate that this training is not effective or sufficient to ensure adequate knowledge of official inspectors responsible for the official controls in slaughterhouses.

24. Mechanisms are in place to provide guarantees about the effectiveness of the official controls. However, these mechanisms are not working properly because the supervision system over the OVs' performance is not able to uncover the weaknesses in the official controls and, when shortcomings are identified during the internal audits, these remain unsolved.

25. The system in place provides official staff with the authority to enforce legal requirements. However, the effectiveness of this system is compromised because the official controls are not able to detect non-compliances, or they do not record them and so, enforcement actions are not imposed. Moreover, when non compliances are detected, officials do not always impose enforcement actions to solve the issues.

## 5.3 ORGANISATION AND IMPLEMENTATION OF OFFICIAL CONTROLS

### *5.3.1 Official controls at slaughterhouse level*

**Legal requirements**

Article 18 of Regulation (EU) 2017/625.

Articles 3, 4, 5, 6, 7 and 8 of Regulation (EU) 2019/624.

Articles 10 to 21, 23 to 25, 29, 30, 31, 33, 34 and 43 of Regulation (EU) 2019/627.

**Findings**

*Ante-mortem inspection*

26. In all the red meat and poultry slaughterhouses visited, the AMI was carried out by OVs, who were, in the poultry slaughterhouse, assisted by OAs for the performance of particular tasks.

27. AMI consists of controls on animal welfare during transport and unloading, physical checks and controls on identification of animals and on the documents accompanying

them. In the event of animals not identified prior to slaughter, the OVs were aware of the actions they should take.

28. None of the OVs in the slaughterhouses visited recorded the outcome of the AMI on-the-spot. Therefore, information about the animals that passed satisfactorily the AMI is not transferred to the slaughterhouse (no system of positive release existed). This system does not provide guarantees that only those animals that had been subject to AMI and had been declared fit for slaughter could be processed by the FBO. The CA explained that this is the common practice in smaller slaughterhouses as there is direct communication between the OVs carrying out AMI and the OVs in the PMI positions. The audit team noted that the CA has not issued any instruction/procedure requiring OVs performing AMI to keep records of the outcome (e.g. record all the relevant findings of AMI) and pass this information to the slaughterhouse operator before accepting the animals for slaughter.

29. At the slaughterhouses visited it was observed that in the logbooks, that are filled out once the slaughter has taken place, the information concerning the identification of the animals and the final AMI decision were recorded (fit for slaughter or not). No further details in relation to animal health or welfare were indicated.

30. In all the slaughterhouses (for domestic ungulates) visited, the porcine animals were routinely washed with pressurized water before the entrance to the slaughter line. This was also the case for bovines if they were very dirty. In one establishment it was noted that the bovines were slaughtered and de-hided while they were still wet posing an increased risk of contamination of the carcass. These practices were neither detailed in the FBO's self-control systems nor questioned by the OVs. The audit team noted that none of the FBOs implemented any written procedures in order to ensure that live animals are clean and to deal with excessively soiled animals. Moreover, the OVs met did not verify the FBOs' obligation in this regard during the AMI. This is not in line with Article 11(4) of Regulation (EU) 2019/627.

31. In the slaughterhouses visited, the OVs were aware of the requirement to carry out animal welfare checks and to take suitable action when needed. Animal welfare checks were also included in the planned thematic controls (see also paragraph 43) with a minimum frequency of two controls per year. The CCA had not issued any instructions to assist the OVs on the performance of these duties.

32. The audit team observed some non-compliances in relation to the animal welfare in the slaughterhouses for ungulates visited that had not been previously noted/recorded, neither by the OVs nor by the RFSDs during their visits. In all the slaughterhouses visited the maximum number of animals allowed in each of the pens in the lairage was not clearly indicated, contrary to what point 2.3 of Annex III to Regulation (EC) No 1099/2009 requires. In one establishment the floor in the lairage was particularly damaged and could lead to the severe injury of the ungulates. In addition, the areas for the isolation and clinical inspection of suspected animals were not indicated or not existed.

33. Serious deficiencies were noted during the stunning and killing of birds in the poultry slaughterhouse visited. The audit team noted that a high percentage of animals showed signs of consciousness after the stunning process (e.g. birds lifting their heads, showing extensive flapping of wings, having their eyes open) and this is contrary to the requirements of Article 4(1) of Regulation (EC) No 1099/2009. The audit team requested the examination of a stunned bird from the line and observed clear signs of consciousness of the animal (opening and closing of its mouth, shaking its head, reacting to touching). Neither the FBO nor the CA recognised these signs as improper stunning. In their opinion, those signs were part of the normal behaviour of stunned birds. In addition, the audit team noted that most of the birds suffered pre-stunning electrical shocks when entering the water bath, as the wings and the body of the birds were touching the water of the stunner before their heads, and there was no 'breast comforter' available. All these observations are contrary to requirements provided in Regulation (EC) No 1099/2009. No corrective actions were requested (i.e. stopping the line) by the CAs in this slaughterhouse during these findings.

*Post-mortem inspection*

34. The PMI is carried out always by OVs. In some of the poultry slaughterhouses they are assisted, for particular tasks, by OAs. All the establishments visited had a sufficient number of OVs to carry out the PMI.

35. At the slaughterhouses for ungulates visited, the practical arrangements for PMI were not fully in line with the requirements of Regulation (EU) 2019/627: there was not a clear PMI point, with adequate working conditions and with the necessary equipment (adequate lighting, equipment for the recording of the PMI results, equipment for the disinfection of the OV's knives, dedicated wash-hand basins), designated. As a consequence, the OV could not easily perform a visual examination of all the external surfaces and of the cavities of bovine carcases. Moreover, as the OV was carrying out the PMI checks in different locations in the slaughter line, it was not clear the point in the slaughter line where the carcases are declared fit for human consumption (e.g. before or after the washing by the FBO). In one of the establishments the OV had to move to a separate room for the examination of the heads of bovine carcases, as this was the location decided by the FBO, making difficult the correlation between carcases and heads.

36. The audit team observed that different systems/methods applied during the PMI in the slaughterhouses for domestic ungulates visited and there are not specific instructions for official staff on how the PMI should be done. For example, the audit team noted:

- Different incisions carried out in the different slaughterhouses by the OVs during the PMI. The OVs interviewed provided different information as regards the compulsory incisions and checks (visual checks, palpations) of carcases required by EU legislation.

- In one of the two bovine slaughterhouses the incisions of the masseters were not made in parallel to the mandible and there was one incision instead of the two required by EU legislation in the outer masseters.

- Some organs (i.e., stomachs and intestines) were not always subject to PMI as they were discarded immediately after evisceration.

- In the porcine slaughterhouse, there was no correlation of carcases and offal (kidneys, spleen, stomachs and intestines) during the PMI,

- In certain cases, the PMI was limited to visual inspection of organs and no palpation was carried out.

37. In the same slaughterhouses the OVs did not have an adequate system to record PMI details. In all the cases observed the total quantities of condemnations were recorded in the PMI logbook. However, the specific reasons for which a carcase/meat have been condemned and the link to a particular batch of animals was not reported (e.g. it was documented the total weight of offal rejected due to pneumonia or ascites without describing the exact offal). Therefore, the system in place does not allow the FBOs and OVs to provide feedback on information that could affect human or animal health, or compromise animal welfare, to other interested parties (e.g. FBO responsible for the holding of provenance, CAs responsible for supervising these holding). The CA explained that currently there is no instruction or template model on how and when the communication with the holding of provenance should take place.

38. Serious deviations from the requirements of the EU legislation on PMI were noted by the audit team in the poultry slaughterhouse visited. More in particular:

- The PMI was carried out by the OVs (with the support of slaughterhouse staff). There was no designated and suitably equipped area for the PMI (lack of equipment for the recording of the results and the disinfection of the knives, no mirror for the inspection of all the external surfaces, no additional lighting, etc.).

- There was no PMI of the offal. The offal was collected and transferred to a separate part of the establishment to be washed. There was no correlation between carcases and offal. The livers and intestines of the birds were discarded immediately after evisceration.

- There was no recording of the PMI results (neither by the slaughterhouse staff nor by the OV). No relevant information on the cause and the exact quantities of the meat condemned was recorded in the PMI logbook.

- After the PMI, the carcases (or part of them), declared unfit for human consumption, were collected by the slaughterhouse staff to be disposed. The OV (or the OA) did not carry out (or did not record) any inspection of a sample of these carcases (or parts of them), contrary to Article 25(1) of Regulation (EU) 2019/627. In addition, there was no daily inspection of the viscera and body cavities of a representative sample of each flock by the OV (or an OA) as also required by the same Article.

### *5.3.2 Official controls over food business operators' obligations*

*Food Chain Information (FCI) and animal identification*

**Legal requirements**

Article 3 of Regulation (EC) No 853/2004 in conjunction with its Annex II Section III and Article 9 and 10, 40, 41 42 and 43.1 of Regulation (EU) 2019/627.

**Findings**

39. An electronic document must be generated through an integrated information system of the BFSA for the movement of animals for slaughter from the farm of origin to the slaughterhouse. This document, called the veterinary certificate, is drawn up by the private veterinarian of the holding and includes information on the holding (registration number), the farmer and the driver/vehicle, the identification (individual or group) and number of animals intended for slaughter, the clinical condition, the results of any diagnostic tests carried out and the slaughterhouse where the animals will be delivered.

40. Moreover, and in addition to the food chain information (FCI) document signed by the farmer, the farm veterinarian certifies in an additional document that the lot of animals has not been treated with veterinary medicinal products or that their withdrawal periods have expired.

41. The OVs routinely check that FBOs receive and deal with FCI and the accompanying documentation. The controls on animal identification form part of the AMI carried out by the OVs in the lairage. All OVs met had a suitable knowledge of the relevant requirements. In the case of the bovine slaughterhouses visited, the OV checked that all the animals were properly identified and accompanied by a passport.

*General and specific hygiene requirements*

**Legal requirements**

Article 4 of Regulation (EC) No 852/2004, Article 3 of Regulation (EC) No 853/2004 and Article 46 of Regulation (EU) 2019/627.

**Findings**

42. The frequency of official controls carried out by the RFSDs is based on risk. The audit team was informed that a new instruction for determining the risk of food establishments was being applied since January 2024. For establishments producing food of animal origin the risk assessment is drawn up by an inspection team of two inspectors, one of whom has been appointed by the Director of the RFSDs to carry out official controls

there. For slaughterhouses, these inspection teams include the OVs responsible for the official controls at these premises.

43. The official control plan for each slaughterhouse, drafted also by the OV, should include several topics of control during the year (thematic controls). Examples of these topics are the animal welfare conditions during transport and killing, traceability, good manufacturing practices and good hygienic practices and the temperature control. The general and specific hygiene requirements the FBOs of the slaughterhouses must comply with, are always included in the topics checked during these controls. All the activities of an approved slaughterhouse must be subject to a full inspection once a year. The audit team noted that the planned frequency was achieved in the establishments visited.

44. In all but one of the establishments visited, the premises, facilities and hygiene practices were in general satisfactory. However, some deficiencies were noted by the audit team that had not previously been observed/recorded by the CAs (e.g. cleaning of the floor with high pressure splashing water, while exposed carcasses were present, with risk of contamination of meat, dirty overhead rails above exposed meat, lack of cleaning and disinfection of footwear of the workers entering the facilities).

45. Serious non-compliances were noted in one slaughterhouse of domestic ungulates which had not been detected and/or recorded previously by any level of official controls, neither by the OV not the RFSD (see also paragraphs 20 and 21). More specifically the audit team noted: damage to the floors, walls and the ceiling in the evisceration and areas for further processing of the carcases, rusty equipment above exposed meat, damaged equipment in several parts of the establishment, broken surfaces, dirty chillers with surfaces not able to be suitably cleaned and/ or disinfected, gaps between the floors and the external doors, not allowing suitable pest control, and bad hygiene standards in several parts on the establishment that were linked to the slaughterhouse and were approved for cutting and preparation of meat.

46. In addition to the thematic controls and the AMI and PMI, the OVs are also tasked with the daily monitoring of the hygiene conditions during slaughtering operations, imposing enforcement measures when necessary. The audit team received some written examples of notices (prescriptions) issued by the OVs as evidence of such enforcement actions in the establishments visited. It was noted that they referred to the cleaning of the premises or the hygiene practices and not to the long-standing deficiencies described above.

*Hazard Analysis and Critical Control Point (HACCP)*

**Legal requirements**

Article 5 of Regulation (EC) No 852/2004.

**Findings**

47. During the approval process of a new establishment the RFSD should carry out a thorough audit of the FBO's HACCP-based procedures as part of their food safety management system. Once the final approval is granted, the FBOs' HACCP system is audited by the RFSD every two years. A general HACCP checklist should be used during these audits. The audit team noted that this checklist is not suitable for assessment of HACCP systems in slaughterhouses as it referred to risks and activities not present in these establishments (e.g. processing activities).

48. In the establishments visited, the FBOs considered the chilling temperatures of meat as the most important points to control. In all but one of the establishments the evisceration (and the risk of faecal contamination) was not considered as a control point in the HACCP systems assessed. In all the establishments visited, the corrective action provided for in the HACCP plans in case of faecal contamination of carcases was the cleaning with water.

49. In all but one of the establishments visited the cleanliness of live animals before slaughter was not taken into consideration in the HACCP plans. This was monitored in one of the establishments even though that procedure was not included in the HACCP plan, which also did not include clear instructions or corrective actions. This establishment was approved in 2022 and, in this regard, no observations were noted by the CA.

50. According to the information provided by the CA, and in addition to the RFSD audits, the FBOs own-checks are evaluated during the OV's thematic inspections. The audit and inspection reports the CA shared with the audit team did not include any remark concerning the above-mentioned aspects. The BFSA explained that there are no guidelines concerning assessment of HACCP systems available for the regional inspectors or the OVs.

*Microbiological criteria*

**Legal requirements**

Article 35 and 36 of Regulation (EU) 2019/627.

Commission Regulation (EC) No 2073/2005.

**Findings**

51. All the FBOs at the establishments visited had a microbiological sampling plan in place. This plan is verified by the OVs during their thematic controls. There are no official instructions in place to assist the OVs on this verification and on the subsequent official actions needed in case of non-compliance.

52. The audit team noted that in two of the domestic ungulate slaughterhouses visited the OVs had detected (during the last inspections carried out in 2024) that the frequency of the microbiological sampling for process hygiene criteria on meat was not in line with Regulation (EC) No 2073/2005. In response, action plans were provided by the FBOs to

correct this non-compliance. In one of these cases the OV accepted a fortnightly (and not weekly) frequency for the sampling of carcases for *Salmonella*, *Enterobacteriaceae* and *aerobic colony count* despite the fact that no negative results in thirty (or six) consecutive weeks had been obtained previously. Moreover, the deadline for the FBO to comply with this obligation was 7 months. To be also noted that in the HACCP plan of this establishment, approved in 2022, the relevant sampling frequency was one sample per month and that was accepted by the CA during the approval procedure.

53. The RFSDs, based on BFSA guidelines, implement an official microbiological sampling and testing programme. In the case of red meat carcases, five sample units are taken by the OV and analysed for *Salmonella*, *Enterobacteriaceae* and for *aerobic colony counts*. For broiler carcases, neck skin samples are collected and analysed for *Salmonella* and *Campylobacter*. The annual number of samples per slaughterhouse are calculated by the RFSDs on the basis of the slaughterhouse's throughput data of the previous year.

54. The audit team noted that the sampling target was achieved in all the RFSDs visited. In the slaughterhouses visited the official sampling did not reveal any non-compliant results.

55. No positive analyses results for *Salmonella* and *Campylobacter* were obtained in the FBO's own-check controls carried out the last three years, in the poultry slaughterhouse visited.

*Traceability, labelling and health marking*

56. The audit team noted that the traceability of animals and carcases are verified during AMI, PMI, the OV`s thematic inspections and during RSFD audits. Evidence of these verifications was seen in all the slaughterhouses visited.

57. The national legislation establishes the procedure for the health marking of carcases intended for human consumption. This legislation allows the application of a health mark before the Trichinella (pigs) or transmissible spongiform encephalopathy (bovine older than 30 months) examination results are available, if the procedures in place, authorised by the OV, ensure traceability of all parts of the carcases, and provide guarantees that no part of the examined carcases bearing the health mark leaves the slaughterhouse until a negative result is obtained.

58. The health mark is affixed by an OV or official auxiliary under the responsibility of the OV. In the case of carcases of species susceptible to *Trichinella* infection, the OV can delegate this task to slaughterhouse staff in the presence and under his supervision. In all the slaughterhouses visited, the carcases checked by the audit team in the chiller and after PMI had legible health marks.

**Conclusions on organisation and implementation of official controls**

59. An official control plan, based on risk, is implemented by the CA. However, the limited

detection and/or recording of non-compliances at establishment level and, consequently, the lack of enforcement actions to correct the non-compliant situations compromise the effectiveness of the control system in place. In this regard, significant shortcomings in relation to the sanitary conditions and to the animal welfare conditions were noted that had not been previously identified or recorded in any level of official control.

60. The control system in place includes taking official samples for microbiological analyses in order to assess the safety of red meat and poultry meat.

61. Certain official controls at slaughterhouse level are not carried out in line with the EU requirements. In particular, the serious deviations from the legally required practical arrangements concerning PMI and the controls on HACCP-based procedures undermine the reliability of the OVs' decision on the fitness of meat for human consumption.

62. The AMI and the controls on FCI, animal identification and traceability are in general in line with the EU requirements. However, the lack of procedures for suitable recording and communication of AMI and PMI results by the OVs has, as a consequence, that no feedback is provided to the competent authorities and operators at primary production level in order to take appropriate actions when these inspections reveal a disease or condition that might affect human or animal health or animal welfare.

## 6 OVERALL CONCLUSION

The structure and organisation of the Competent Authority are adequate and provide a suitable basis for the performance of its tasks in the areas covered by this audit.

The official control system for the production of red meat and poultry meat comprises almost all the elements laid down in EU legislation. However, its effectiveness is seriously compromised because the detection and/or recording of non-compliances during the official controls is limited, the enforcement measures taken when non-compliances are detected are also limited, there is a lack of documented procedures/instructions for the staff performing the official controls and, in addition, some official tasks are not carried out in accordance with EU rules.

Although mechanisms are in place to provide assurances on the effectiveness of the official controls, they do not work properly as they do not detect some shortcomings in the performance of official controls or, when they do, they do not take appropriate measures to correct them.

## 7 CLOSING MEETING

A closing meeting was held via videoconference on 11 June with the CCA. At this meeting, the audit team presented the main findings and preliminary conclusions of the audit and advised the CCA of the relevant time limits for their response.

The representatives of CCA acknowledged the findings and conclusions presented by the audit team.

## 8 RECOMMENDATIONS

The competent authority is invited to provide details of the actions taken and planned, including deadlines for their completion ('action plan'), aimed at addressing the recommendations set out below. With regard to those non-compliances noted in the audit report which did not result in a recommendation being made, the competent authority is, nevertheless, requested to address these. The effectiveness of the actions taken to address such non-compliances will be assessed in future audits on this topic.

| No. | Recommendation |
|---|---|
| 1. | The CA should ensure that official controls are performed in accordance with documented procedures, which shall contain instructions for staff performing official controls as required by Article 12(1) of Regulation (EU) 2017/625.<br><br>*Recommendation based on conclusions Nos 4, 59, 61 and 62*<br><br>*Associated finding Nos 2, 12, 31, 36, 49, 50 and 51* |
| 2. | The CA should ensure that the staff performing official controls in slaughterhouses are kept up-to-date in their area of competence and receive regular additional training as necessary as required by Article 5(4) of Regulation (EU) 2017/625.<br><br>*Recommendation based on conclusion No 23*<br><br>*Associated finding No 14* |
| 3. | The CA should:<br><br>- ensure that procedures and/or arrangements are in place to verify the effectiveness, quality and consistency of official controls as required by Article 5(1) of Regulation (EU) 2017/625 and, in particular, that official controls in slaughterhouses are carried out effectively and appropriately and<br><br>- take appropriate measures to remedy the shortcomings identified through internal audits, in accordance with Article 6(1) of Regulation (EU) 2017/625.<br><br>*Recommendation based on conclusions Nos 4, 24, 59 and 61*<br><br>*Associated findings Nos 18, 30, 32, 33, 35, 36 and 38* |
| 4. | To review the application of enforcement measures in order to guarantee that where non-compliances are established, appropriate measures are taken to ensure that the operator concerned remedies the non-compliance and prevents further occurrences of such non-compliance, as required by Article 138 of Regulation |

| No. | Recommendation |
|---|---|
| | (EU) 2017/625.<br><br>*Recommendation based on conclusion No 25*<br><br>*Associated findings Nos* 20, 21, 33 and 46 |
| **5.** | The competent authority should ensure that official controls at slaughterhouse level are carried out in line with the EU requirements. In particular, that:<br><br>- post-mortem inspection is carried out in accordance with Regulation (EU) 2019/627,<br><br>- the sanitary conditions and the HACCP plans in slaughterhouses are appropriate in terms of addressing the relevant risks as required by Article 3 of Regulation (EC) No 2073/2005, Articles 4 and 5 of Regulation (EC) No 852/2004 and Article 3(1) of Regulation (EC) No 853/2004,<br><br>- the animal welfare conditions at the time of killing are in line with the requirements of Regulation (EC) No 1099/2009<br><br>*Recommendation based on conclusions Nos 59 and 61*<br><br>*Associated findings No 32, 33, 35, 36, 38, 44, 45, 48, 49 and 52* |
| **6.** | To ensure that the official veterinarians record and evaluate the results of ante-mortem and post-mortem inspection and, where the inspection reveals the presence of any disease or condition that might affect human or animal health, or compromise animal welfare, communicates this information in accordance with Article 39 of Regulation (EU) 2019/627.<br><br>*Recommendation based on conclusion No 62*<br><br>*Associated findings Nos 28, 29, 37 and 38* |

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

http://ec.europa.eu/food/audits-analysis/rep_details_en.cfm?rep_inspection_ref=2024-8030

**ANNEX 1 - LEGAL REFERENCES**

| Legal Reference | Official Journal | Title |
|---|---|---|
| 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. 2017/625 | OJ L 95, 7.4.2017, p. 1–142 | Regulation (EU) 2017/625 of the European Parliament and of the Council of 15 March 2017 on official controls and other official activities performed to ensure the application of food and feed law, rules on animal health and welfare, plant health and plant protection products, amending Regulations (EC) No 999/2001, (EC) No 396/2005, (EC) No 1069/2009, (EC) No 1107/2009, (EU) No 1151/2012, (EU) No 652/2014, (EU) 2016/429 and (EU) 2016/2031 of the European Parliament and of the Council, Council Regulations (EC) No 1/2005 and (EC) No 1099/2009 and Council Directives 98/58/EC, 1999/74/EC, 2007/43/EC, 2008/119/EC and 2008/120/EC, and repealing Regulations (EC) No 854/2004 and (EC) No 882/2004 of the European Parliament and of the Council, Council Directives 89/608/EEC, 89/662/EEC, 90/425/EEC, 91/496/EEC, 96/23/EC, 96/93/EC and 97/78/EC and Council Decision 92/438/EEC (Official Controls Regulation) |

| Legal Reference | Official Journal | Title |
|---|---|---|
| Reg. 2019/624 | OJ L 131, 17.5.2019, p. 1–17 | 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 |
| Reg. 2019/627 | OJ L 131, 17.5.2019, p. 51–100 | 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 |
| 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 |
| 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 |

| Legal Reference | Official Journal | Title |
|---|---|---|
| Reg. 2019/2035 | OJ L 314, 5.12.2019, p. 115–169 | Commission Delegated Regulation (EU) 2019/2035 of 28 June 2019 supplementing Regulation (EU) 2016/429 of the European Parliament and of the Council as regards rules for establishments keeping terrestrial animals and hatcheries, and the traceability of certain kept terrestrial animals and hatching eggs |
| Reg. 2017/949 | OJ L 143, 3.6.2017, p. 1–4 | Commission Implementing Regulation (EU) 2017/949 of 2 June 2017 laying down rules for the application of Regulation (EC) No 1760/2000 of the European Parliament and of the Council with regard to the configuration of the identification code for bovine animals and amending Commission Regulation (EC) No 911/2004 |
| Reg. 1169/2011 | OJ L 304, 22.11.2011, p. 18-63 | Regulation (EU) No 1169/2011 of the European Parliament and of the Council of 25 October 2011 on the provision of food information to consumers, amending Regulations (EC) No 1924/2006 and (EC) No 1925/2006 of the European Parliament and of the Council, and repealing Commission Directive 87/250/EEC, Council Directive 90/496/EEC, Commission Directive 1999/10/EC, Directive 2000/13/EC of the European Parliament and of the Council, Commission Directives 2002/67/EC and 2008/5/EC and Commission Regulation (EC) No 608/2004 |
| 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 |

| Legal Reference | Official Journal | Title |
|---|---|---|
| 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 |
| Dir. 2020/2184 | OJ L 435, 23.12.2020, p. 1–62 | Directive (EU) 2020/2184 of the European Parliament and of the Council of 16 December 2020 on the quality of water intended for human consumption (recast) |
| Reg. 1/2005 | OJ L 3, 5.1.2005, p. 1-44 | Council Regulation (EC) No 1/2005 of 22 December 2004 on the protection of animals during transport and related operations and amending Directives 64/432/EEC and 93/119/EC and Regulation (EC) No 1255/97 |
| Reg. 1099/2009 | OJ L 303, 18.11.2009, p. 1-30 | Council Regulation (EC) No 1099/2009 of 24 September 2009 on the protection of animals at the time of killing |