CA response received 22 April 2015

Response of the Competent Authorities of Canada to the recommendations of Report ref. DG(SANTÉ)/2014-7216 -MR of an audit carried out from 02 May 2014 to 15 May 2014 in order to evaluate the operation of controls over the production of fresh meat, meat products, minced meat, meat preparations and casings for human consumption destined for export to the European Union under the auspice of the Agreement between the European Community and Canada on sanitary measures to protect public health and animal health in respect of trade in live animals and animal products.

N°	***Recommendation***	***Action Proposed by the Competent Authority***
1	To develop risk based procedures for the audit of the bovine/bison holdings (farms, feedlots, markets, tagging stations) and to include physical checks on the animals in the holdings audited, as well as reconciliation exercises on a routine basis (e.g. ear tags, animal movements, ongoing EU eligibility).	In support of this recommendation the Canadian Food Inspection Agency (CFIA) has been involved with the following activities to enhance the current programs surrounding this subject: **TRACE Canada Program:** The Trace Canada program and related Manual of Procedures outline verification tasks that are risk –based with detailed task frequencies and duration. Since the completion of the EU DG (SANTÉ) audit, the CFIA has been developing an evaluation framework to enhance the robustness of the TRACE program. **Traceability National Information Portal:** The Traceability National Information Portal (TNIP) has been developed as a single window through which livestock identification and traceability information may be accessed by authorized users. This initiative has been and continues to be a multi-jurisdictional program including the participation of the CFIA, Agriculture and Agri-food Canada, Provincial Governments and Industry. In support of the Traceability National Informational Portal, TRACE-Canada was created in 2013 with objective to merge the ATQ and CCIA databases. It is expected that the TRACE-Canada database will be ready to receive data in July 2016. Trace-Canada (ATQ+CCIA) will be the livestock traceability repository by 2016. The CFIA has produced a User's Manual for Livestock Identification and Traceability Program (latest version: December 1, 2014). The purpose of this document is to help the

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		CFIA inspectors in verifying compliance and enforcing livestock identification and traceability requirements provided under Part XV of the *Health of Animals Regulations*. **Change of Origin for Approved Animal ID Tags:** As a completed action point in support of this recommendation, all approved tags applied at the tagging sites shall only be issued to the farm of origin. This change will further enhance the trace back capabilities within Canada. As of 1 July 2014, approved tags applied at the tagging sites shall only be issued to the farm of origin. Moreover, the responsible administrator of the database must maintain and publish a list of approved tagging sites[1]. There are no longer "approved tagging sites" as previously defined. **Future Enhancement for Livestock Identification (ID):** A consultation paper dated November 5, 2013 has been drafted in order to evaluate the impact of possible changes in requirements for livestock identification and traceability regulations, that would include: reducing the delay for notifying events (movements, imports, exports, death) from 30 days to 7 days; making the identification of holdings mandatory nationwide; reporting domestic movement of livestock and broadening the scope of the program by including caprine and cervid (in addition to bison, bovine, ovine and porcine). This initiative continues to develop. **Animal ID within the Growth-Enhancement Products:**

[1] *www.canadaid.com/dealers/tagging_sites.html*

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		Within the Growth Enhancement Products-free program there are intense identification and traceability requirements. This is the cornerstone of the program including inventory and record control of identification tags, on farm transfer certificates identifying the identification of each animal on the load (wherever and whenever they are transferred) and on-site auditing by approved CFIA veterinarians. Additional requirements regarding the animal movement within the hormone-free beef programme are described in GEP-Free Program User's Manual (Section 5.4).
2	To address the deficiencies identified in relation to the design and implementation of the program for certifying freedom from GEPs for bovines and bison in order to improve the robustness of the programme.	It is understood that this was specific to one feedlot. Deficiencies related to shipping movement documents have been followed up by CFIA staff using CFIA's inspection procedures. As a result, a written action plan has been provided by the regulated party and resulting corrective measures have been reviewed by the CFIA approved veterinarian and by the CFIA District Veterinarian and were found to be effective. To further enhance this observation an Operational Directive will be developed and distributed to the CFIA District Veterinarian, instructing them to ensure that these points are re-enforced and reviewed with all CFIA approved veterinarians during the required CFIA annual CFIA approved veterinarian audit. This directive will be distributed to staff by August 2015. CFIA implements GEP-Free Program which was developed in consultation with the EU. Under this program, the verification activities are performed by the CFIA District Veterinarians. Section 6.3 of the GEP-Free User's manual describes these activities as follows:

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		"The CFIA District Veterinarian will review the CFIA Approved Veterinarian's participation in this program at a minimum annually." The role of the CFIA District Veterinarian is to assess the competencies of the CFIA approved veterinarian. This may involve a visit to one of the cow-calf operations or feedlots under the supervision of the CFIA approved veterinarian, but does not include all of them. Only those feedlots participating under the Tariff Free Quota for high quality beef will be visited by the CFIA District Veterinarian once per year. One of the components of the assessment is to evaluate any conflict of interest through the participation in the program by the CFIA approved veterinarian. Also see response to recommendation #1 related to animal movements and traceability.
3	To ensure that testosterone and other substances which are banned to be used in food producing animals according to Council Directive 96/22/EC are not used in horses from which meat is intended for export to the European Union.	In follow up to this recommendation, CFIA will remove Testosterone from Annex E.7 of Chapter 17 of the Meat Hygiene Manual of Procedures (MHMOP) by June 2015. Section 17.5.2.2 of Chapter 17 deals with control over hazards associated with receiving of live animals. The operator of the slaughter establishment must ensure that hazards associated with food animals are properly identified and addressed in the HACCP system. The operator is required to ensure that the hazard associated with exposure to chemical contaminants and the use of veterinary drugs are identified on the list of chemical hazards (FSEP Form 6 or equivalent) and controlled in the company's HACCP system. Proper control mechanisms must be developed so that animals received and slaughtered, and carcasses and their

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		parts processed in the establishment are in compliance with the applicable requirements respecting the use of veterinary drugs in Canada. All relevant information from the level of primary production shall be taken into account on an ongoing basis. The operator shall receive assurance from producers that animals presented for slaughter are acceptable for human consumption. This means that biological, chemical and physical hazards are identified and to the extent possible controlled at the farm level. Every operator shall develop, implement and maintain a control program to verify the accuracy and completeness of the animal information document received. This control program must also include the review of health status information on all livestock as a condition of slaughter eligibility. In the current direction, drug use is restricted to the list of drugs for horses intended for food production (see Annex E 6 and 7 of Ch.17 of MHMOP). Also Annex E5 of Ch.17 contains a list of substances not permitted for use in horses for food production, which is in line with the banned and prohibited substances in the EU. An Operational Directive will be developed and distributed to VIC's in horse slaughter plants instructing them to remind operators that the Equine Identification Document (EID) must be accurate prior to slaughter. Distribution Date: August 2015. CFIA will work with Canadian industry to strengthen the ways and means of ensuring that animal identification and treatment records are credible and complete for 180 days prior to slaughter. This process will begin with engagement with the Canadian equine industry by April 2015.
4	To ensure that treatment records are kept on horse holdings in line with	The drugs used for the last 180 days prior to horse slaughter

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	Article 10 of Council Directive 96/23/EC and that horses are adequately identified for this purpose, either individually or as a lot.	should be declared in the individual or lot Equine Identification Document (EID), in line with Annex E2 and E4 of Chapter 17 of MHMOP. Corrective actions have been taken by CFIA inspection staff, in respect to all observations made during the audit in relation to the EIDs, at individual establishments. An Operational Directive will be distributed to all VICs at horse slaughter establishments, instructing them to remind operators that all EIDs must be accurate prior to slaughter. This directive will be distributed by August 2015. The CFIA will work with the horse industry to strengthen the ways and means of ensuring that animal identification and treatment records are credible and complete for the 180 days prior to slaughter. This process will begin with engagement with the Canadian equine industry by April 2015.
5	To ensure that follow-up on non-compliant test results has an equivalent effect to the requirements of Articles 16-19, 22 and 23 of Council Directive 96/23/EC.	Section 5.2.5.4 of Chapter 5 of MHMOP states that samples which are found to be violative under the National Chemical Residue Monitoring Program will be followed up in the same manner as any other violative test result. The presence of a violative residue will trigger a farm visit. Based on the results of that inspection, the producer may be subjected to compliance testing. Furthermore, section 5.2.7.5 of Chapter 5 of MHMOP explains the actions to be taken by the Program Specialist in case a violative result is confirmed in kidney or muscle. The Program Specialist is responsible to arrange an inspection of the farm of origin, in accordance with the Animal Health Manual on Chemical Residues Chemical residue results that indicate residues detected in equine

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		meat products shall be investigated by the operator to determine if the implicated previously accepted EID contains declarations that may not be valid. The corresponding EID shall be located by the operator. If a discrepancy exists between declared drug usage and residues detected, the operator shall effect corrective actions to ensure the validity of EIDs they accept is strengthened. The CFIA shall conduct a verification of the operators control procedures and corrective actions related to the validity of Equine Information Documents accepted by the operator. CFIA will finalize the Compliance Verification System (CVS) task as mentioned in Ch. 17 Section 5.5.7 in the MHMOP. This task will enable the CFIA staff to follow-up on chemical residue violations at horse holdings (i.e. auctions and buyers premises). Also, CFIA will work with industry to strengthen follow-up procedures whereby they can follow-up on non-compliant results with their suppliers to ensure that animal (domestic and imported) information is accurate, credible and meets the 180 day record for animal ID and treatment requirements. This process will begin with engagement with the Canadian equine industry by April 2015.
6	To ensure that the approval conditions for export to the EU are subject to regular review as required by Chapter 18 of the MHMOP and that the lists of establishments approved for export to the EU are kept up to date, fully reflecting the activities carried out and communicated to the Commission as required by Article 12 (3) of Regulation (EC) No 854/2004.	In follow up to this recommendation the CFIA will develop a CVS task specific for verification of EU requirements based on details within Chapter 11 of the MHMOP, for a yearly delivery at all EU eligible establishments. Implementation of this task targeted to be in the next fiscal year (April 2015). Verification of EU requirements by inspection staff will be documented in the CVS database and this information will be tracked and reported to senior management on a regular basis.

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7	To ensure that minced bison meat is produced in line with the provisions of Section V of Annex III to Regulation (EC) No 853/2004 as required in section II.1.3 of the export certificate (model BOV).	It is understood that this was specific to one establishment. Deficiencies related to the absence of supporting documentation or labels showing that the preparation date of the minced bison meat is within the 6 days after slaughter or in the case of de-boned, vacuum-packed beef, is within the 15 days after slaughter have been followed up by the CFIA Veterinarian In Charge (VIC) of the establishment, using the CVS process. As a result, a written action plan has been provided by the regulated party and resulting corrective measures have been reviewed by the VIC and were found to be effective. To further support this observation the CFIA will ensure that CFIA inspection staff verify that the operators are meeting EU requirements related to the production of minced bison meat.

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