CFIA Proposed Changes to the EU DG (SANTÉ) 2014 Draft Report of Canadian control system and requirements for fresh meat, meat products, minced meat and meat preparations and castings for human consumption.

Original Text from EU Food and Veterinary Office (FVO) Report	CFIA Proposed Changes/Amended Text
5.2 HOLDING REGISTRATION, ANIMAL IDENTIFICATION AND MOVEMENT CONTROLS	
Findings Individual farms or registered tagging sites may order ear tags. The ear tag used in Canada is one single tamper-evident Radio Frequency Identification (RFID), yellow colour for bovine animals and white for bison, which contains a non-repeatable, unique number. The ear tags ordered are allocated to the farm or approved tagging sites and all the numbers issued throughout Canada are recorded in the Canadian Cattle Identification Agency (CCIA) database.	All regulated parties required to apply or replace an approved tag may order them through an approved dealer. ~~Individual farms or registered tagging sites may order ear tags.~~ The approved ear tag used in Canada are ~~is one single~~ tamper-evident, electronic ~~Radio Frequency Identification (RFID)~~, yellow colour for bovine animals and white for dairy and bison, and bear a unique ~~which contains a non-repeatable, unique~~ identification number, using the ISO 11784 standard (with country code). The approved ear tags ordered are allocated to ~~the farm or approved tagged sites~~ a site: this information is reported and recorded ~~and all the numbers issued throughout Canada are recorded~~ in the responsible administrator's database. The administrator responsible for bison, bovine and ovine is the Canadian Cattle Identification Agency (CCIA), whereas the Canadian Pork Council is the administrator responsible for pigs and farmed wild boars. Agri-Traçabilité Québec (ATQ) is an organization similar to an administrator responsible for the management of traceability information reported from Quebec livestock traceability regulations.
Two databases are in operation in Canada: "Agri-Traçabilité Québec" (ATQ) database in the province of Québec and the CCIA database in Alberta. The CCIA is a non-profit, industry led organisation established to promote and protect animal health and food safety concerns in the Canadian cattle herd.	~~Two databased are in operation in Canada~~ Livestock identification and traceability databases in Canada include: "Agri-Traçabilité Québec" (ATQ) in the province of Québec, PigTrace and the CCIA database ~~in Alberta~~. The CCIA is a non-profit, industry led organisation established to promote and

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	protect animal health and food safety concerns in the Canadian cattle herd.
A consultation paper dated 5 November 2013 has been drafted in order to evaluate the impact of possible changes in requirements for livestock identification and traceability regulations, in particular, in regard to reducing the delay for notifying events (movements, exports, death) from 30 days to 7 days.	A consultation paper dated 5 November 2013 has been drafted in order to evaluate the impact of possible changes in requirements for livestock identification and traceability regulations, in particular, in regard to reducing the delay for notifying events (movements, imports, exports, death) from 30 days to 7 days. Through the same consultation process, it is proposed that the identification of holdings would become mandatory nationwide through federal regulations; that domestic movement of livestock be reported; and that the scope of the program be broadened to include caprine and cervid.
Observations: • (3 rd Bullet) The livestock producing farms (bovine/bison) are obliged to keep data on the identification number and enough information about the animal to be able to trace its origin.	**Observations:** • The livestock producing farms (bovine/bison) are obliged to keep data on the identification number and enough information about the animal to be able to trace its origin. The tag distributors must report to the responsible administrator all tag transactions within 24 hours. All approved tags applied to bovines sent to a tagging site to be identified must be issued to the farm of origin.

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Observations: At one feedlot visited several of the shipping movement documents issued on the farms of origin were incorrectly completed, e.g.: 1) dates, names, signatures or identification numbers missing, 2) blank pre-signed photocopies filled in, 3) valid GEPs assessment report not present. These deficiencies had not been identified by the CFIA-approved veterinarian during his six monthly controls.	At the one feedlot visited several of the shipping movement documents issued on the farms of origin were incorrectly completed, e.g.: 1) dates, names, signatures or identification numbers missing, 2) blank pre-signed photocopies filled in, 3) valid GEPs assessment report not present. These deficiencies had not been identified by the CFIA-approved veterinarian during his six monthly controls.
5.4 HORMONE-FREE PRODUCTION OF BEEF MEAT DESTINED TO BE EXPORTED TO THE EU AND IT'S CONTROLS	
Section 5.5.3.1 Veterinary medicinal products Health Canada has developed a policy through which certain products for horses, dogs and cats can be placed on the market without the need for a marketing authorisation. VMPs for horses containing substances for which no MRL has been established in Canada, including substances which according to section B.01.048 the Food and Drug Regulations are not permitted to be sold to be administered to food producing animals (chloramphenicol, nitrofurans, clenbuterol, nitroimidazoles and stilbenes), can be authorised for use in horses. According to Health Canada the product information should contain in these cases a warning "not to be used in horse for food production".	Health Canada has developed a policy through which certain low risk veterinary health products for horses, dogs and cats can be placed on the market without the need for a traditional marketing authorization provided they meet set criteria established by Health Canada. VMPs for horses containing substances for which no MRL has been established in Canada, including substances which according to section B.01.048 of the Food and Drug Regulations are not permitted to be sold, to be administered to food producing animals (chloramphenicol, nitrofurans, clenbuterol, nitroimidazoles and stilbenes), can be authorised for use in horses. According to Health Canada the product information should contain in these cases a warning " Federal law prohibits the administration of this preparation to animals that

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	produce food or that are intended for consumption as food~~". "not to be used in horse for food production".~~

CFIA Follow up Items in Response to the EU DG (SANTÉ) 2014 Draft Report of Canadian control system and requirements for fresh meat, meat products, minced meat and meat preparations and castings for human consumption.

Original Text from EU Food and Veterinary Office (FVO) Report	CFIA Follow up Items
Section 5.6 Listing of Establishments	
One casings establishment visited was listed without fulfilling the requirements (several points were noted as "incomplete" or "non-compliant" in the Annex M that had been filled in a few days before the FVO visit – no older Annex M was available).	This issue was an isolated incident and was addressed by senior management at the Area level. In addition, a Compliance Verification System (CVS) task specific for verification of EU requirements will be created for yearly delivery at all EU eligible establishments. Implementation of this task is targeted to begin 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.
Section 5.7.1 Ante-mortem inspection	
The ante-mortem inspection was carried out appropriately, apart from one case where the severe lameness of one horse identified at the point of entry had not been recorded in the ante mortem inspection records.	Addressed at the time of the audit using the CVS inspection process. CFIA has conducted a follow up of non-compliant item and item has been corrected.
Section 5.7.2 Post-mortem inspection	
• In one slaughterhouse, the CA did not notice that the skin of the head of one horse was not entirely removed before presentation for post-mortem and the lower part of the carcasses were inspected only. • In three slaughterhouses, the renal fat was not removed from the kidneys. In one of these slaughterhouses, the kidneys were not inspected, the lower part of the	Addressed at the time of the audit using the CVS inspection process. CFIA has conducted follow up of non-compliant items and items have been corrected. This statement is applicable to all the bullet points.

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carcasses was inspected only. These deficiencies had not been recorded during official controls.	
Section 5.7.3 General and specific hygiene requirements	
• The above-mentioned establishment is now largely in compliance with regard to lairage and kill floor. However, some deficiencies were identified, mainly in the chillers and cold store room that only had undergone limited renovation, which could lead to potential contamination of carcasses. • In another establishment visited the de-hiding was not carried out in a hygienic way. At one point at the slaughter line, the skin was rolling in on the carcass and exposed meat was in touch with contaminated hide. Immediate corrective action was requested by the CA. • The other establishments were generally in line with the requirements with only minor non- compliances identified by the FVO audit team, e.g.: • The procedure for the use of the lockers in changing rooms was not complied with (e.g. separation between work clothes and street clothes); • Dirty cattle were accepted for slaughter which made it very difficult to avoid faecal contamination of carcasses; • Edible offal (hearts, kidneys and livers) remained too long at ambient temperature; • Handling of cardboard boxes and unprotected meat by the same operators; • Cardboard boxes not completely closed and sealed (possible to access meat without breqking the seal); • The use of insufficiently protected wooden pallets in close	Addressed at the time of the audit using the CVS. CFIA conducted follow up of non-compliant items and items have been corrected. This statement is applicable to all the bullet points.

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proximity to exposed meat. The special condition in the Veterinary Agreement to phase out the use of wooden pallets in rooms with exposed products is not fulfilled.	
Section - 5.7.4 HACCP-based systems	
• One month prior to the FVO visit a HACCP System Design review identified numerous significant deficiencies in one slaughterhouse visited and a lengthy CAR was issued. However, the VIC and the RVO had not identified previously any of these non-compliance during their CVS controls. • Freezing of boxed meat in one establishment was done in the storage freezer and the statement regarding time/temperature had never been verified. The boxed meat for freezing was in some cases stacked on pallets without separators to allow air to flow freely which made it impossible to achieve the stated time/temperature requirement.	• This issue was an isolated incident at one establishment and was addressed by senior management at the Area level. • Addressed at the time of the audit using the CVS inspection process. CFIA conducted follow up of non-compliant item and item has been corrected.
Section 5.7.6 Trichinella testing / freeze treatment	
In one other slaughterhouse the quarters were still stamped with the special Trichinella mark (round stamp with the letter "T") and in two cold stores the labels of cartons containing horse meat intended for export to the EU also bore this mark. It was not identified or recorded by the CA that the practice had not been updated in line with current EU requirements.	MOP Ch.11 mentions that horse meat should be tested for Trichinella using the validated digestion method. It is not a requirement to stamp boxes with the special Trichinella mark (round stamp with letter "T"). This is an industry practice to identify that meat in those boxes/quarters have been tested for Trichinella.
Section 5.7.7 Traceability and health identification marking	
• In one establishment visited, the slaughter dates mentioned on the certificates for horses and bovine/bison were provided by the establishment and there was no documented procedure to ascertain the link between the production of meat and the slaughter dates. However, in the near future a system	These issues were addressed at the time of the audit using the CVS inspection process. CFIA conducted follow up of non-compliant items and items have been corrected. This statement is applicable to all the bullet points.

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for scanning the barcodes of the bovine/horse carcasses at the entrance to the de-boning room was expected to solve this deficiency. The equipment had already been installed. • In another establishment visited, the horse carcasses fit for human consumption were not health marked with the oval stamp to indicate eligibility for the EU, but with the internal Canadian health mark. Carcasses were retained and only released for de-boning once results of the Trichinella testing were available. • Fresh meat produced from horses imported from the US did not clearly indicate the origin on the labels. In the certificates verified, the animal health declaration indicated that the meat of the horses was of origin Canada and of origin US. • In one of the three slaughterhouse visited, it had not been noted by the CA during official controls that the link between the EIDs and the horse carcasses was missing. • In one establishment, they could not ascertain that the minced meat produced from fresh bison meat, was prepared within the no more than 6 days after slaughter or in the case of de- boned, vacuum-packed beef, within the no more than 15 days after slaughter, neither through supporting documentation nor through the labels attached to the meat. This is not in line with Section V of Annex III to Regulation (EC) No 853/2004 as required in section II.1.3 of the export certificate (model BOV). This shortcoming had not been identified by the CA.	
Section 5.7.8 Animal welfare at the time of slaughter	
• No significant animal welfare concerns were found in any of the establishments visited, despite one incident where the CFIA	Addressed at the time of the audit using the CVS inspection process. CFIA conducted follow up and non-compliant item has

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had to intervene at the moment of stunning. conditions for the safe handling and slaughter of bison.	been corrected.
Section 5.8 - OFFICIAL CERTIFICATION	
• In one casing plant visited, although the registration, the labelling, the traceability and documentation was not satisfactory, nevertheless, an export certificate was issued. In addition, for the same consignment a certificate for transit and one for import was issued (casings for Cyprus). • Although required, one plant had no written procedures for preparing the documentation needed for certification. • In one slaughterhouse, the verification by the RVO of the certification process did not cover all the topics foreseen in the report template. Although two certificates had been verified by the RVO, none of these covered exports to the EU.	This issue was an isolated incident at one establishment and was addressed by senior management at the Area level. In addition a CVS task specific for verification of EU requirements will be created 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.