

Lead Food officers

REHIS

SFELC

24<sup>th</sup> October 2016

ENF/16/016

Dear Colleagues,

**Recommendations arising from an audit by the EU Commission to evaluate the food safety control systems in place governing the production and placing on the market of fishery products in the UK.**

The Directorate General for Health and Food audits and analysis (Directorate F), formerly the Food and Veterinary Office (FVO) conducted an audit from 18<sup>th</sup> – 29<sup>th</sup> April 2016 in order to evaluate the food safety control systems in place governing the production and placing on the market of fishery products in the UK.

This routine audit was part of their annual programme of audits of EU member states. This audit focused on England and Wales, however the recommendations are relevant to the UK as a whole.

The report was generally positive and Directorate F auditors were satisfied with the official control system based on EU requirements and national legislation that the UK has in place.

However the Directorate F auditors made two recommendations intended to address what they consider to be gaps with regards to delivery of official controls, with the objective of enhancing the control system in place. These are detailed below, along with the FSA advice to LAs:

**Recommendation 1.** The Competent Authority (CA) should ensure that all fishing vessels are inspected as required under Annex III, Chapter I, part 1(b) of Regulation (EC) No 854/2004 and that requirements of Chapter I, Section VIII of Annex III to Regulation (EC) No 853/2004 are met.

LA's currently prioritise their inspections of vessels based on local intelligence including that shared with other regulators and inspecting bodies in the UK such as when those bodies have concerns over the hygiene or safety of fishing vessels they inspect, as well as the risk score generated from the Food Law Code of Practice.

FSS is content that this approach, which allows LA's to target their interventions on a risk basis to the highest priority establishments. However, it is the intention of FSS to work closely with colleagues in FSA in order to better facilitate the sharing of information and to put more formal arrangements in place with FSA, other regulators and inspection bodies, to help better inform the LA inspection programme, in due course. FSS will keep LAs informed of the progress of this action via the fish and shellfish working group of SFELC.

**Recommendation 2.** As required in Article 7 of Regulation No 854/2004 the CA should ensure that all of the elements detailed in Annex III chapter II on official controls of fishery products are included in the scope of their inspections. In particular random organoleptic examinations, and random testing to ensure compliance with histamine limits and the presence of parasites should be carried out as appropriate during official control inspection at fishery products establishments. Consideration should be given to the need to take samples to verify compliance with required maximum permitted levels in relation to histamine and parasites. When determining whether samples are required the LA should take into account whether concerns are identified with the HACCP- based procedures or the FBOs own sampling and testing.

Full details of the audit can be found using the following link:

[http://ec.europa.eu/food/audits-analysis/audit\\_reports/details.cfm?rep\\_id=3666](http://ec.europa.eu/food/audits-analysis/audit_reports/details.cfm?rep_id=3666)

Yours sincerely



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