

To: Lead Food Officers
cc: REHIS, COSLA, SFELC

6 January 2016

FSS/ENF/16/001

Dear Colleague

FVO Recommendations for approved egg products establishments

In March 2015, the Food and Veterinary Office (FVO) carried out an audit to evaluate the Food Safety Control Systems in place governing the production and placing on the market of eggs and egg products in the UK. This was undertaken as part of their routine audit programme. Although the final report recognises that there is generally a satisfactory system for official controls in the UK, the auditors identified some areas in which the delivery of controls in approved egg products establishments were deficient and where improvements need to be made.

This letter provides advice on targeted action to be considered during interventions at approved egg products establishments, to address the recommendations made by the FVO.

The FVO report makes eight recommendations and these all relate to the controls in place for approved egg products establishments.

http://ec.europa.eu/food/fvo/audit_reports/details.cfm?rep_id=3508

You are asked to note the recommendations and take appropriate action to ensure that approved egg products establishments in your authority are compliant with the requirements in the Hygiene Regulations and other relevant legislation.

Findings and specific actions required

1. Approval of Establishments

Approval documentation reviewed at the egg products establishments visited did not accurately reflect all of the activities being undertaken at the establishment. FBOs are required to notify the LA where there are significant changes to their operations in accordance with Article 6 (2) or Regulation (EC) No 852/2004. In approved establishments, the FBO should apply to the LA where they need to be approved for additional activities and LAs must then make an assessment of the procedures and controls for the proposed activity and this should be on the establishment file. For example, where a liquid egg manufacturer intends to also produce other egg products such as dried egg powder, boiled eggs and so on, they must be approved for the activity and the approval documentation should reflect what the FBO is approved for.

The FVO auditors noted that although the FBOs visited had been issued with a unique approval number by their LA, the ID mark incorporating this number applied to paperwork accompanying the bulk transport of liquid egg was not in the format required in Annex II Section I. This states that the mark must be in an oval and with country and EU code.

Action

LAs must ensure that they have carried out an assessment of all the procedures for each establishment requiring approval before granting approval or conditional approval for the activity and before the FBO carries out the activity. FBOs must be approved for all activities undertaken at approved egg and egg products establishments and the approval documentation must be kept up to date in accordance with Article 31 of Regulation (EC) No 882/2004.

LAs must also ensure that FBOs are applying their ID mark in the correct format for bulk transport of liquid egg in accordance with Annex II Section I of Regulation (EC) No 853/2004.

2. Risk rating and interventions

There was concern raised by the FVO auditors that egg products establishments were not visited at the appropriate minimum frequency according to the Risk Score allocated using the FSA code of Practice. It is important the minimum intervention frequency is maintained in such approved establishments. It was noted during one audit that the minimum inspection frequency for the egg products processing establishment was a category "E" which was queried on the basis that the inspection frequency was too low.

Action

LAs are to ensure that risk ratings for high risk egg product manufacture are appropriate using the risk scoring in Section 5.6 of the Code of Practice. The resulting minimum intervention frequencies are to be adhered to.

3. HACCP-based procedures in egg processing establishments

The FVO auditors found that although HACCP-based procedures were in place in establishments visited, they did not always sufficiently address all the requirements in of Regulation (EC) No 853/2004. In particular FBOs were not fully compliant with Chapter II part III 7 of Annex III Section X which sets out time and temperature requirements for eggs which are broken but not used immediately.

Action

LAs to ensure that FBOs' HACCP based procedures for egg products are appropriate and that the specific requirements in Regulation (EC) No 853/2004, in particular Annex III Section X as well as the more general requirements in Regulation (EC) No 852/2004 are met.

4. Analytical specifications in Regulation (EC) No 853/2004

LAs must verify that FBOs comply with any relevant criteria in Annex III Section X (Eggs and egg products) of Regulation (EC) No 853/2004 when carrying out interventions at approved establishments. The FVO audit team observed that sampling and analysis at egg products establishments did not always include the analytical specifications in Annex III Chapter II Part IV for 3-OH-butyric acid and lactic acid content. Establishments producing egg products should be testing for 3 OH-butyric acid, lactic acid and extraneous material in accordance with these requirements. The purpose of the analytical testing is to verify the age of eggs. Other controls should be in place to ensure that the eggs used are of an appropriate age but the Regulation requires some verification of this through the use of these tests, at a frequency to be determined by the FBO and verified as appropriate by the LA.

Action

LAs to ensure that FBOs are carrying out checks in accordance with Annex III Section X Chapter II Part IV of Regulation (EC) No 853/2004.

5. Transport of liquid egg

At two egg processing establishments visited by the FVO auditors, the LAs in question confirmed that vehicles owned by the FBO and used for the transport of liquid egg and other egg products fell within the scope of the approval and checks would be made on the vehicles periodically. However, in both cases, there was a lack of documented evidence that checks on the hygiene of the vehicles were carried out to demonstrate compliance with Annex II Chapter IV of Regulation (EC) No 852/2004.

Specific issues were also found relating to the labelling and transport of liquid destined for further processing elsewhere. Annex III, Section X, Chapter II, Part V.1 of Regulation (EC) No 853/2004 requires FBOs to include in the label of the product the appropriate time and temperature at which

the product can be stored prior to processing. In one case, there was no indication on label of the storage time.

Action

LAs to ensure that vehicles and transport are considered as part of LA interventions at approved egg products establishments and that liquid egg transported to other establishments for further processing is appropriately labelled in accordance with Part V.1, Chapter II, Section X of Annex III to Regulation (EC) No 853/2004.

There is further advice available on egg products establishments in the FSS Practice Guidance, Annex 7. A link to the Code of Practice and Practice Guidance can be found here:
<http://www.foodstandards.gov.scot/food-law-code-practice-2015>

Yours sincerely



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