



Guidance for Enforcement Bodies

Enforcement of Hygiene Regulations on Egg Production Sites in the United Kingdom

Version 1.0
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1 SUMMARY

Intended audience:	Bodies responsible for the enforcement of Regulations (EC) 852/2004 and 853/2004 on egg production sites, trade organisations and individual egg producers.
Regional coverage:	The guidance applies to all countries within the United Kingdom.
Legal status:	<p>These guidance notes provide informal, non-binding advice on the legal requirements of Regulations (EC) 852/2004, (EC) 853/2004 and The Food Hygiene Regulations 2006 and should be read in conjunction with the legislation itself.</p> <p>The text should not be taken as an authoritative statement or interpretation of the law, as only the courts have this power.</p>
Purpose:	To provide guidance for enforcement bodies on typical inspection points on egg production sites, i.e. the areas that will be subject to inspection and the standards expected for producers to comply with the legislation as listed above. The document will be made available to all stakeholders, including egg producers to help them to understand the legislation and how to comply with it.

2 REVISION HISTORY

Revision No.	Revision date	Purpose of revision	Revised by
0	January 2008	Draft Guidance	Jason Gittins & Alan Lyne (ADAS)
0.1	March 2008	Draft Guidance	Jason Gittins & Alan Lyne (ADAS)
0.2	November 2008	Draft Guidance, amended based on consultation comments	Robert Martin (FSA)
1.0	February 2009	Finalised Guidance – Version 1	Robert Martin (FSA)

3 REGULATIONS REFERRED TO IN THIS GUIDANCE

These Guidance Notes cover requirements set out in European legislation and given effect by separate but parallel regulations in all four countries of the UK.

Details are given below of how these regulations are referred to in the text, plus the full name and number of the respective regulation in each country. A summary of these regulations by country is in Annex A.

Regulation (EC) 852/2004, on the hygiene of foodstuffs

Regulation (EC) 853/2004, laying down specific hygiene rules for food of animal origin

The Food Hygiene Regulations 2006:

- The Food Hygiene (England) Regulations 2006, as amended
- The Food Hygiene (Wales) Regulations 2006, as amended
- The Food Hygiene (Scotland) Regulations 2006, as amended
- The Food Hygiene Regulations (Northern Ireland) 2006, as amended

4 INTENDED AUDIENCE

Bodies responsible for the enforcement of Regulations (EC) 852/2004 and 853/2004 on egg production sites, trade organisations and individual egg producers.

5 PURPOSE AND LEGAL STATUS

Guidance on regulation

These guidance notes have been produced to provide informal, non-binding advice on the legal requirements of Regulations (EC) 852/2004, (EC) 853/2004 and The Food Hygiene Regulations 2006 and should be read in conjunction with the legislation itself.

These notes provide guidance for enforcement bodies on typical inspection points on egg production sites, i.e. the areas that will be subject to inspection and the standards expected for producers to comply with the legislation as listed above. The guidance is available to all stakeholders, including egg producers to help them to understand the legislation and how to comply with it.

The text should not be taken as an authoritative statement or interpretation of the law, as only the courts have this power. Every effort has been made to ensure that these guidance notes are as helpful as possible. However, it is ultimately the responsibility of individual businesses to ensure their compliance with the law. Businesses with specific queries may wish to seek the advice of their local enforcement agency, details of which are given on the cover of this guidance.

It should be noted that this guidance relates only to the enforcement of EU Hygiene regulations on egg production sites in the United Kingdom. It does not provide guidance on other issues that may apply at egg production sites or packing stations, such as welfare requirements, marketing standards, methods of production or approval of egg packing stations. Such issues are covered by separate regulatory requirements, environmental issues and enforcement mechanisms.

Different enforcement bodies may have responsibility for the enforcement of each of these issues and so may require separate on-farm inspection visits. The Agency's Food Law Practice Guidance (England) (section 4.2.3: Co-ordination of Inspections, and equivalent guidance in Scotland and Wales and Northern Ireland¹) recognises the advantages and benefits that can be achieved by co-ordinating inspections, which are also encouraged by LACORS².

In accordance with other EU Regulations (Reg 882/2004, Article 3(2), and Regulation 589/2008 Article 24(5)) inspections will be carried out without prior warning.

6 INTRODUCTION TO INSPECTION

This document is intended to provide guidance to enforcement bodies in the United Kingdom on the application of Regulations (EC) 852/2004 and 853/2004 to egg production sites. These Regulations have been incorporated in national legislation within the Food Hygiene Regulations, England (2006) and equivalent regulations for Wales, Scotland and Northern Ireland.

The guidance is also available to stakeholders and other interested parties, including trade organisations and individual egg producers.

Relevant parts of 852/2004 and 853/2004 and the key aims are outlined in the boxed sections in this document and these are listed within the following main headings:-

- Birds and Housing
- Egg Collection and Storage
- Hygiene Control and Personnel
- Record Keeping

The inspector will use a checklist, such as that provided at Annex B, to make assessments against the following criteria:-

- A tick (√): the premises is fully compliant
- A zero (0): is not fully compliant (the inspector will give guidance on how to achieve full compliance)
- A cross (x): is non-compliant (the inspector will require that action is taken within a specified timescale).

The completed checklist will be retained by the inspector. The inspector will provide a report on the inspection to the operator (either on completion of the inspection or

¹ <http://www.food.gov.uk/enforcement/enforcework/foodlawcop/>

² LACORS – Local Authorities Co-ordinators of Regulatory Services

sent on later) in the format described in Annex 6 of the Food Law Code of Practice. The report will summarise findings from the inspection and describe any actions that the operator is required to undertake, along with when they need to be carried out. It is expected that the Inspector will generally be accompanied for at least part of a routine inspection by the producer, his/her representative or a 'responsible person' to answer questions on hygiene procedures and operating practices. (Note that a 'responsible person' can be the approved occupiers or their adult family members, their agents, manager or appropriate employee).

However, should this not be possible, it is desirable that the producer, his/her representative or a responsible person should be available towards the end of the inspection to discuss the hygiene conditions observed and any remedial actions required.

Where the Inspector is performing a 'follow-up' inspection then the presence of the producer, his/her representative or a responsible person may not be required.

The details contained within this document will be reviewed from time to time to reflect changes in inspection practices.

Should Inspectors notice or suspect that issues outside their authorised remit may require action by another enforcement body, they should refer that matter to the appropriate enforcement body.

7 BIRDS AND HOUSING

A System and Bird Cleanliness

852/2004 Annex I Part A II Paras 4(a, b, c)

Aim

Facilities and equipment used for egg production are to be kept clean and where necessary after cleaning, they are to be disinfected. Producers are to take adequate measures to ensure the cleanliness of laying hens.

- 1 Poultry houses should be inspected for cleanliness, to ensure the hygiene of the eggs and to discourage pest activity. Poultry house internal structures should allow for thorough cleaning to take place, particularly at the time of depopulation. The design and maintenance of cage systems should be checked to ensure that there is no build-up of manure inside the cages. Manure stored beneath slats in non-cage systems should be checked to ensure that it is securely retained and not allowed to overflow.
- 2 Laying hens should be inspected for cleanliness. The condition of any litter provided should be checked. In systems in which birds can move between different levels, perches must be positioned to minimise fouling of any hens perched below and droppings falling in drinking and feeding facilities. Where

birds have outdoor access, an inspection should be made of conditions outside the house and facilities in place for the birds to clean themselves (e.g. slatted/drained areas outside the house, clean litter, slats etc. inside the house).

- 3 When an inspection coincides with a house being empty, cleaning and disinfection practices should be considered and the inspector should be satisfied that appropriate practices are being followed.

B Feed and Water

852/2004 Annex I Part A II Paras 4(a, d, f)

Aim

To control contamination arising from feed and water and to use any feed additives correctly. To use potable water or clean water whenever necessary to prevent contamination.

Feed:-

- 1 On sites where milling and mixing of feed takes place, the inspection should determine the source of the ingredients used, including the source and type of any concentrates or supplements used. The inspector should understand how each ingredient is stored on the site (e.g. in bags or bulk) and assess the risks of contamination due to the cleanliness of storage facilities, moisture, the presence of animals and pests and any other factors.
- 2 On sites where finished feed is bought-in, the inspection should establish whether storage is in bulk or in bags and assess the risks of contamination as above. The inspector should be satisfied that the feed is sourced from a reputable supplier (e.g. in compliance with the UFAS Code of Practice for the Manufacture of Safe Compound Animal Feedstuffs) and that any supplements provided (e.g. limestone grit) are also unlikely to lead to contamination risks. If veterinary medicinal products are used, this must be recorded (see D3).
- 3 For free range production, the inspection should also consider any risks arising as a result of the birds' access to range land or to other farm buildings or stores. If birds have access to the area around the feed bin, then this should be checked for spillage as a basis for assessing whether birds may be able to consume feed which is physically or microbiologically contaminated.
- 4 When an inspection coincides with a house being empty, the cleaning and disinfection practices associated with feed storage facilities (e.g. bulk bins) and feeding systems (e.g. chain feeders, troughs, tubes and pans) should be considered. The risks of contamination should be assessed. The inspector should be satisfied that any feed left over after de-population is either appropriately stored or transferred for use in another house.

Water:-

- 5 The inspection should determine the source of the water supply. If a non-mains supply is used (e.g. borehole), the inspector may need to understand the design, the use of any water treatment systems and should determine whether water quality tests have been undertaken.
- 6 The inspection should assess the cleanliness of drinking systems in the laying house and the risk of water contamination.
- 7 For free range production, the inspection should consider whether birds are consuming water outside the house, whether in purpose-designed drinking systems or from rainwater/puddles on the range. If so, the inspector must consider the extent and assess the risks likely to arise from this.
- 8 When an inspection coincides with a house being empty, the cleaning and disinfection practices associated with drinkers, pipelines and header tanks should be considered.

C Pests and Other Livestock

852/2004 Annex I Part A II Para 4(f)

Aim

Take adequate measures to prevent animals and pests from causing contamination.

- 1 The inspection should include poultry houses, stores and any feed manufacturing areas. These should be assessed to determine whether the construction and maintenance is suitable for the exclusion of animals and pests, including wild birds, rodents and domestic animals. Buildings should be inspected for gaps and holes which would allow entry and for evidence of pest activity (e.g. damage to structures, visible signs, smell). If poultry house doors are left open at any time, then the consequent risks should be assessed.
- 2 Poultry houses and related buildings should be examined for insect infestations (e.g. flies and mites).
- 3 In order to minimise the number of harbourages for pests, the inspection should verify that areas inside and around buildings are kept clean and tidy and that any vegetation around the buildings is kept low at all times of the year.
- 4 The inspector should determine what procedures are in place for rodent and insect pest control. If carried out by a contractor, the inspector should ascertain the frequency of visits. If done by farm staff, the inspector should be satisfied that those involved are capable of carrying out the work to an appropriate standard. The inspector may ask to see any documentary evidence of the inspections undertaken and the products used.

- 5 The inspector should ensure that pesticides are not accessible to the birds at any time. Bait boxes should be checked for spillage, particularly in non-cage systems. The inspector should check that all pest control products are permitted for use and if in doubt should note the product name and manufacturer and make appropriate checks afterwards (e.g. in the Pesticides Blue Book, Health and Safety Executive).

D Inspection, Disposal and Veterinary Inputs

852/2004 Annex I Part A II Paras 3(a, b), 4(g, h, j)

Aim

Waste and hazardous substances should be stored and handled so as to prevent contamination. The introduction and spread of contagious diseases transmissible to humans through food should be prevented. Feed additives and veterinary medicine products should be used correctly as required by relevant legislation.

1. The inspector should be satisfied that dead birds are removed from cages and from houses with floor systems on a daily basis and that they are stored and disposed of in a way that will not allow potential contaminants to spread. The inspector may ask to see mortality records and evidence of carcass disposal methods e.g. agreements in place for off-site disposal or veterinary approval of any on-site carcass incineration facility.

Note: The Welfare of Farmed Animals (England) Regulations 2007 (and equivalent legislation in Wales, Scotland and Northern Ireland) requires hens to be inspected on at least a daily basis. The Animal By-Products Regulations 2003 sets out requirements for the storage and disposal of carcasses.

- 2 If any manure or used litter is stored on site, the inspector should be satisfied that it is not likely to cause a hygiene or disease risk. This may arise through birds having direct access to such materials or due to proximity to the poultry houses which may prevent adequate pest control.
- 3 The inspector should ascertain if any hens currently on site have received any veterinary medicines during the laying period. If so, the inspector should be satisfied that there has been appropriate veterinary input and that farm personnel involved in administration have adequate experience and suitable knowledge of procedures and any withdrawal period.

8 EGG COLLECTION AND STORAGE

A Cleanliness and Maintenance

852/2004 Annex I Part A II 2, Paras 3(a), 4(a, b)

853/2004 Annex III Section X Chapter 1 Para 1

Aim

Facilities and equipment for egg collection are to be kept clean and where necessary after cleaning, they are to be disinfected. Eggs must be kept clean, dry and free from extraneous odour.

- 1 The inspector should assess whether all egg contact surfaces inside the poultry house (including nestbox floors, egg collection cradles and egg belts), together with associated conveyors, collection tables and farm packing machines are maintained so that eggs are kept clean and dry.
- 2 The inspector should discuss the extent and frequency of cleaning with farm personnel and may check whether there is documentary evidence of regular schedules undertaken.
- 3 The inspector may request information on cleaning materials and disinfectants used and consider whether these are appropriate and suitable. For clarification on whether a disinfectant is listed for use against poultry diseases and used at the recommended concentration, the inspector should consult the Defra or devolved government list of approved disinfectants.

B Systems and Transport

852/2004 Annex I Part A II Para 4(b)

853/2004 Annex III Section X Chapter 1 Para 1

Aim

To ensure that containers, crates and vehicles are kept clean and disinfected where necessary. To ensure that eggs are protected from physical damage and kept clean, dry and out of direct sunshine.

- 1 The inspector should check that relevant equipment such as pallets, palletainers and trolleys are clean when in use and that eggs are protected from rain, direct sunshine and pest contamination. If storage facilities for empty equipment may subsequently lead to contamination of eggs, the inspector should be satisfied that appropriate washing, drying and disinfecting systems are in place prior to use.

- 2 The inspector should assess the overall condition of all systems used and their ability to protect eggs from physical damage during transport.
- 3 If vehicles or trailers are used to move eggs from the production house to a storage facility, the inspector should be satisfied that these systems are kept clean and that eggs are protected from the elements and do not get wet. The inspector should determine whether vehicles or trailers used for eggs are also used for other purposes (whether linked to poultry or not). If so, the inspector should be satisfied that appropriate cleaning and disinfection facilities are in place.

C Egg Storage and Packaging Materials

852/2004 Annex I Part A II Paras 4(b, f)

853/2004 Annex III Section X Chapter 1 Paras 1, 2

Aim

To ensure that eggs are packed in appropriate hygienic conditions and that contamination due to pests and animals is prevented. To ensure that eggs are kept clean, dry, protected from shocks, free of extraneous odour and that they are stored at a suitable temperature.

- 1 Farm storage facilities for eggs should be assessed for cleanliness and for the presence of potential contaminants (including pests and chemicals). The inspector should assess whether the store is capable of storing eggs at a suitable temperature all year round by considering its design, structure and ability to regulate temperature.
- 2 The inspector should examine both the packaging store and egg collection areas where packaging may temporarily be held.
- 3 Checks should be made to ensure that all packaging used is kept dry, that it is clean, has no visible pest contamination and does not carry any odours which may be passed to the eggs.
- 4 If packaging is re-used, the inspector should assess its cleanliness and ability to protect eggs from shocks and physical damage.

9 HYGIENE CONTROL AND PERSONNEL

852/2004 Annex I Part A II Para 4(e)

Aim

To ensure that staff handling foodstuffs are in good health and undergo training on health risks and that food is handled under appropriate hygienic conditions.

- 1 The inspector should be satisfied that the responsible person has appropriate hygiene safeguards in place in respect of all staff handling eggs. This may be done by visual assessment and through a discussion of guidance given to staff and any formal training. Documented training records may be used to verify the information provided.
- 2 The inspector should be satisfied that all egg handlers appear to be in good health. A visual assessment should be made to check whether appropriate standards of personal cleanliness are maintained and whether clothing, (including gloves, if worn) is in a suitably hygienic condition.
- 3 Particular emphasis should be given to the availability and suitability of hand cleansing and drying facilities for egg handlers. The inspector should understand the type and location of facilities provided (e.g. hand wash basins, gel dispensers, towels etc.) and the range of tasks that egg handlers may be performing (whether linked to poultry or not) as a basis for assessing the suitability or otherwise of facilities.
- 4 The inspector should be satisfied that the facilities in place are being used appropriately by staff on a regular basis.

10 RECORD KEEPING

852/2004 Annex 1 Part A II Paras 4 (i), 7-10

Aim

Egg producers must take account of any relevant analyses carried out on samples taken from animals or other samples that have importance to human health and keep records on measures put in place to control hazards. These should be made available to the appropriate inspector, on request. Egg producers may be assisted by others (e.g. veterinarians, feed compounders or advisers) in the keeping of these records.

An inspector may ask to see any of the following records during the course of a visit:-

- 1 Details of the nature and origin of feed fed to the hens (e.g. feed supplier and specification as indicated on delivery note or bag)

- 2 Veterinary medicinal products used, the date(s) of administration and any withdrawal periods
- 3 Information on the occurrence of diseases that may affect the safety of the eggs (e.g. relevant veterinary reports)
- 4 The results of any analyses carried out on hens or eggs that have importance for human health (e.g. the results of testing carried out under the UK National Control Plan for Salmonella in Layers)
- 5 Any relevant reports on checks carried out on hens or eggs

11 WORKED EXAMPLE – COMPLETED CHECKLIST

[A worked example of a completed inspection checklist will be appended to future versions at Annex C]

SUMMARY OF REGULATIONS BY UK COUNTRY

These Guidance Notes cover requirements set out in European legislation and given effect by separate but parallel regulations in all four countries of the UK.

A summary of the regulations referred to for each country is below. A list of the regulations showing how they are referred to in this guidance is at the front of the document.

UK

Regulation (EC) 852/2004, on the hygiene of foodstuffs

Regulation (EC) 853/2004, laying down specific hygiene rules for food of animal origin

England

The Food Hygiene (England) Regulations 2006, as amended

Wales

The Food Hygiene (Wales) Regulations 2006, as amended

Scotland

The Food Hygiene (Scotland) Regulations 2006, as amended

Northern Ireland

The Food Hygiene Regulations (Northern Ireland) 2006, as amended

Example Hygiene Checklist for Egg Production Sites

EMI Ref UK Premises Name _____

Inspection Date & Time _____

Type of Inspection Routine Follow-up Aborted Other _____

Production Type(s) Cage Barn Free range Organic

Scheme Membership BEIC Freedom Foods Organic Other _____

		√/0/X	Comments
1	Birds and Housing		
A	System and bird cleanliness <u>All systems</u> Facilities, equipment kept clean Internal structures allow thorough cleaning Birds can keep themselves clean Roofs and walls protect from water Adequate cleaning & disinfection at turnaround <u>Cage systems</u> No manure build-up in cages <u>Non-cage systems</u> Droppings not falling onto birds below Litter in good condition <u>Range management</u> Outside conditions Facilities available to clean birds		
B	Feed and water <u>Feed</u> Feed ingredient source and storage Finished feed source and storage Source and use of supplements Risks from feed consumption outdoors Feed system cleaned/disinfected at turnaround <u>Water</u> Source of potable or clean drinking water In-house drinking systems Risks from water consumption outdoors Water system cleaned/disinfected at turnaround		
C	Pests and other livestock Poultry houses, stores and feed manufacturing areas appropriate exclusion of pests and animals Evidence of pest activity Insects suitably controlled House surrounds clean and tidy to discourage pests Pest control procedures, pesticides not accessible to birds		

ANNEX B

		√/0/X	Comments
D	<p>Inspection, disposal and veterinary inputs Dead birds removed daily, suitably stored & disposed</p> <p>Manure stored/removed so no hygiene/disease risk</p> <p>No incorrect use of medicinal treatments</p>		
2	<p>Egg Collection and Storage</p>		
A	<p>Cleanliness and maintenance All egg contact surfaces and equipment keep eggs clean and dry</p> <p>Cleaning frequency</p> <p>Suitability of cleaning materials and disinfectants</p>		
B	<p>Systems and transport Vehicles and equipment clean and all contact surfaces dry when in use</p> <p>Eggs kept dry, out of direct sunshine and protected from physical damage</p>		
C	<p>Egg storage and packaging materials Egg storage facilities clean & free of potential contaminants</p> <p>Suitable temperatures can be maintained for eggs all year round</p> <p>Packaging kept dry, clean and odour-free</p> <p>Packaging protected from insect pests, wild birds and vermin</p> <p>Re-used packaging clean and provides adequate protection</p>		
3	<p>Hygiene Control and Personnel</p>		
A	<p>Appropriate hygiene procedures in place for staff</p> <p>Hand washing and drying facilities sufficiently close to working areas to allow frequent use</p> <p>Food handlers in good health and maintain personal cleanliness, with hygienic clothing</p> <p>Facilities provided (e.g. for hand washing) are appropriately used</p>		

ANNEX B

4	Record Keeping	√/0/X	
A	Records kept Nature and origin of feed Veterinary treatments, date of administration and any withdrawal period Diseases that may have food safety implications Results of analyses carried out with significance for human health e.g. NCP for Salmonella		

Comments, Actions and Follow-Up Needed

Inspector		Person(s) Seen	
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WORKED EXAMPLE – COMPLETED CHECKLIST

[A worked example of a completed inspection checklist will be appended to future versions at Annex C]