

Local Authority Delivery Division

Food Standards Scotland
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To: Lead Food Officers

FSS/ENF/26/004

Date: 10th June 2026

Dear Colleague,

Recommendations from the EU audits of GB official controls for poultry and beef products intended for export to the European Union

The EU conducted audits of GB official controls as they relate to poultry and beef, in December 2025 and February 2026 respectively. Following these audits, the European Commission (the Commission) produced reports of their findings.

Food Standards Scotland (FSS), Food Standards Agency (FSA) and the Department for Environment, Food & Rural Affairs (Defra) have been involved in discussions with the Commission on the implications and required actions.

The audit confirmed that GB's official controls are broadly aligned with EU requirements, but the auditors also identified several areas of concern requiring improvement. All Local Authorities (LAs) are asked to take note of the findings and review their current practices to ensure they are undertaking their duties in accordance with the guidance provided in this letter.

FSS, FSA and Defra all have actions arising from these audits. Further LA communications may follow as a result of Defra action responses. For FSS, the SAFER programme encompasses long term actions required to address the root cause of a number of the delivery related findings of these audits, with its aim being to create a delivery system that is sustainably resourced.

Audit recommendations and actions required, as they relate to LA delivery, are provided in:

- [Annex 1 – Beef audit](#)
- [Annex 2 – Poultry audit](#)

Please note that audit findings do not necessarily stem from issues identified within Scottish establishments or with official control arrangements in Scotland. However, recommendations are made on a collective basis, thus findings are being brought to the attention of all Competent Authorities, for action as they deem necessary.

Lead Food Officers are asked to review the recommendations and actions detailed in Annexes 1 and 2, bring these actions to the attention of their team and take appropriate remedial action, where required. A summary table of recommendations has been provided in [Annex 3](#) to assist with this. No feedback to FSS on the action taken is expected as a result.

FSS have also received the EU audit report on fishery products, with a longer timescale for response. We are currently considering the recommendations and will issue a subsequent communication covering the actions from that audit. The summary table within Annex 3 will be re-issued within this subsequent communication, providing a collective summary from all three audits.

Finally, the approach to official control delivery in relation to food additives was raised as part of the poultry audit. Additives were beyond the scope of the audit; however it was noted that official controls were not observed to be active in this area and no relevant guidelines were available. To support LAs in this enforcement area, FSS are finalising Additives Guidance for LAs, which will be distributed soon.

Yours sincerely,

Christine Kelleher

Head of Food Law and Local Authority Partnerships

Annex 1 - Beef Audit

Recommendation 1

Competent Authorities must ensure that their official controls are effective in ensuring compliance with the hygiene regulations. Specific findings highlighted that:

- some official controls observed did not ensure the detection of non-compliance and, as a result, some inspection frequencies were inadequate, resulting in a lack of enforcement
- some establishments were found to be non-compliant with hygiene requirements provided by Annex II of Regulation (EC) No. 852/2004. This included structural maintenance, pest proofing and the hygienic location of wash hand basins
- a cold store was conducting freezing activities, but these activities were not covered within the documented HACCP system, and an incorrect freezing date had been added to the product label

Action required by LAs

LAs are reminded of the importance of assessing and enforcing compliance with the relevant requirements of Annex II of Regulation (EC) No 852/2004 within approved establishments. These requirements provide the essential pre-requisite controls that underpin all other food safety management practices.

To ensure adequate control of food safety hazards, it is essential that all food handling activities are identified and considered as part of the food business operators HACCP system. In accordance with [Official Control Verification guidance](#), this should be checked by LAs when conducting the HACCP study.

Recommendation 2 – Not applicable to LA delivery of food hygiene official controls

Recommendation 3

Competent Authorities must ensure that an approval is only granted following an on-site visit. Specific findings highlighted that:

- a cold store was granted conditional approval without an on-site visit being conducted. While visits were undertaken in advance of an approval decision, a visit was not conducted immediately prior to the act of issuing approval

Action required by LAs

Article 148 (2) of Regulation (EU) No 2017/625 requires an on-site visit to be conducted upon receipt of an approval application. This requirement is re-iterated in the [Food Law Code of Practice](#) and the [Scottish National Protocol](#). LAs are reminded of the distinction between an advisory visit to assist a prospective food business operator to ensure compliance and an approval visit, at which time an assessment is made of compliance in order to reach an approval determination. This distinction is explained in further detail within the Scottish National Protocol.

Annex 2 - Poultry Audit

Recommendations 1 and 2

Competent Authorities must ensure that only establishments that comply with the relevant requirements are included on the EU list of approved establishments, and that appropriate enforcement actions are taken when non-compliances are identified. Findings highlighted that:

- some establishments were non-compliant with hygiene requirements of Annex II of Regulation (EC) No. 852/2004. This included lack of structural repair, lack of hygienic storage and handling of food equipment and inadequate hand-washing facilities
- the volume of production at one establishment was too great to ensure safe and hygienic food production and adequate cleaning could not be achieved
- one establishment was found to be utilising a structure for food storage as part of their approved activities that was beyond the curtilage of their approved establishment and thus not covered by their approval

Action required by LAs

As with recommendation 1 of the beef audit, the importance of assessing compliance with the requirements of Regulation (EC) No 852/2004, Annex II is highlighted.

When conducting official controls at approved establishments, it is essential that the scope of the approval is considered to ensure it remains appropriate. As outlined in the Scottish National Protocol, food business operators are required to notify the competent authority of any significant changes to their operation, this may include an expansion of their operation, either structurally or in production volume. Food business operators should be reminded of this requirement at each intervention.

With specific regard to the changes to the approval curtilage, the Scottish National Protocol states that LAs should obtain revised premises plans and, where necessary, conduct an on-site visit to determine whether the changes are appropriate.

LAs should consider production volumes and establishment capacity during their interventions and ensure the impacts of increased productivity are considered as part of the HACCP study. Where an operation has expanded to an extent that food safety hazards can no longer be controlled, appropriate remedial action should be taken in accordance with the Food Law Code of Practice and your authorities Enforcement Policy.

Recommendation 3 - Not applicable to LA delivery of food hygiene official controls

Recommendation 4

Competent Authorities should ensure that official controls are effective and provide guarantees that food business operators comply with labelling requirements. Findings highlighted that:

- as highlighted by recommendation 1 of the beef audit, a cold store was conducting freezing activities, but these activities were not covered within the documented HACCP system and an incorrect freezing date had been added to the product label

Action required by LAs

LAs are reminded to ensure all activities conducted are covered by the food business operators HACCP system and appropriate labelling controls are implemented accordingly.

To ensure adequate control of food safety hazards, it is essential that all food handling activities are identified and considered as part of the food business operators HACCP system. In accordance with [Official Control Verification guidance](#), this should be checked by LAs when conducting the HACCP study.

Recommendation 5 - Not applicable to LA delivery of food hygiene official controls

Annex 3 – Audit recommendation summary table

Audit recommendation	Requirement	Action taken
Beef Audit - Recommendation 1 Poultry Audit – Recommendations 1 and 2	Ensure official controls are effective in ensuring compliance with Annex II of Regulation (EC) No 852/2004	
Beef Audit – Recommendation 3	Ensure an on-site visit is conducted as part of the approval assessment process	
Beef Audit - Recommendation 1 Poultry Audit – Recommendations 1, 2 and 4	Ensure HACCP procedures and approval documentation adequately reflect practices being conducted	