

- Farmhouse and**
- Artisan**
- Cheese & Dairy Producers**
- European Network**

# **Advisory Group on the Food Chain and Animal and Plant Health on the revision of official controls in food of animal origin**

**7<sup>th</sup> November 2017**

**OFFICIAL CONTROLS ON RAW MILK AND DAIRY PRODUCTS  
FACEnetwork POSITION AND PROPOSALS**

**Farmhouse and  
Artisan  
Cheese & Dairy Producers  
European Network**

- 1. Written documents and records regarding HACCP based plans (FSMS)**
- 2. Official controls and the use of guides to good practice**
- 3. Identification mark in cheeses with no label**
- 4. Official controls to verify the use of veterinary medicinal products**
- 5. Raw milk that doesn't meet the plate count/somatic cell count criteria**

## 1 FSMS: written documents and records

***“Official control methods and techniques shall include the following as appropriate:***

- e. an examination of documents, traceability records and other records which may be relevant to the assessment of compliance with the rules referred to in Article 1(2), including, where appropriate, documents accompanying food, feed and any substance or material entering or leaving an establishment”***

Reg. (UE) No 625/2017, art. 14

***“Member States shall ensure that food business operators offer all assistance needed to ensure that official controls carried out by the competent authority can be performed effectively. They shall in particular:***

- make available any documentation and record required under the present regulation or considered necessary by the competent authority for judging the situation”.***

Reg. (EC) No 854/2004, art. 4.1

1

## FSMS: written documents and records

Farmhouse and  
Artisan  
Cheese & Dairy Producers  
European Network

### FACEnetwork PROPOSAL: INCLUDE

- “When demanding documentation and records others than required under the Regulations, official inspectors shall take into account the decision made by the food business operator about keeping written documents and records in the context of their Food Safety Management System”.

2

## Official controls and the use of guides

*“When, in accordance with article 5 of Regulation (EC) No 852/2004, a food business operator uses procedures set out in guides to the application of HACCP principles rather than establishing its own specific procedures, the audit shall cover the correct use of these guides”.*

Reg. (EC) No 854/2004, art. 4.5 (**and draft document on the new Commission Implementing Act**)

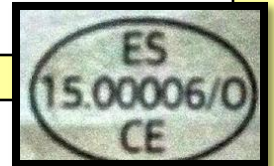
### FACEnetwork PROPOSAL: INCLUDE

- It also applies to any other form of official controls as defined in Reg. (EC) No 882/2004: verification, inspection, monitoring, surveillance

### 3 Identification mark

***“Verification of compliance with the requirements of Regulation (EC) No 853/2004 concerning the application of identification marks shall take place in all establishments approved in accordance with that Regulation, in addition to verification of compliance with other traceability requirements”.***

Reg. (EC) No 854/2004, art. 4.6



- Regulation 625/2017 (OCR):
  - No mention to *“Identification mark”*
  - Included in the definition of *“Official attestations”*? (Whereas 70; art.3.28)
- Draft Document on the new Commission Implementing Act:
  - No mention to *“Identification mark”*
  - Clarification needed

### 3 Identification mark

- Not relevant for consumers (not included in CIR): Traceability purpose
- It's possible to sell unpacked cheeses without any label (Reg. 1169/2011, art. 8.6)
- However, the identification mark must be applied (Reg. 853/2004, annex II, sec.I.C.9.):
  - a) Directly to the product, the wrapping or the packaging
  - b) Printed on a label affixed to the product, the wrapping or the packaging
  - c) May be an irremovable tag made of a resistant material
- When cutting the cheese for selling, this mark can disappear ¿?
  - Not possible for official inspector to verify at the selling point

FACEnetwork PROPOSAL: Make it possible that

- Identification mark can be included on the commercial documents if such documents either accompany the food to which they refer or are sent before or at the same time as delivery

## 4 Official controls to verify the use of veterinary medicinal products

*“In the case of raw milk and colostrum, the competent authority is to monitor the checks carried out in accordance with Annex III, Section IX, Chapter I, Part III to Regulation (EC) No 853/2004”*

Reg. (EC) No 854/2004, annex IV, chap.II.1.(and draft document on the new Commission Implementing Act)



*“A representative number of samples of raw milk and colostrum collected from milk production holdings taken by random sampling must be checked for compliance with points 3 and 4 (antibiotic residues)”:*

Reg. (EC) No 853/2004, annex III, sec IX, chap. I.III. 2 and 4.

### FACEnetwork PROPOSAL:

- When dairy products are made from milk from the own livestock, sampling and checking for antibiotic residues may not be compulsory if the FBO can demonstrate the correct use of veterinary products by other means like records on antibiotic use and the following of veterinary prescription



## 5 Raw milk that doesn't meet the plate count/somatic cell count criteria

***“If the FBO has not corrected the situation within 3 months of first notifying the competent authority of non-compliance with the criteria, delivery of raw milk and colostrum from the production holding is to be suspended or — in accordance with a specific authorisation of, or general instructions from, the competent authority — subjected to requirements concerning its treatment and use necessary to protect public health”***

Reg. (EC) No 854/2004, annex IV, chap.II.2. **(and draft document on the new Commission Implementing Act)**

***“A MS may maintain or establish national rules permitting the use of raw milk not meeting the criteria as regards plate count and somatic cell count of the manufacture of cheeses with an ageing or ripening period of at least 60 days, and dairy products obtained in connection with the manufacture of such cheeses***

Reg. (EC) No 853/2004, at. 10.8.b.

### **FACEnetwork PROPOSAL:**

- **Maintain only the redaction of Reg. (EC) No 854/2004 and draft document**

THANKS