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Food Safety Inspections : Operational Implementation of European Legislation by the French Competent Authority

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1. What food businesses are expected to do under EU legislation (« Hygiene package »)

2. Competent Authority supervision and official controls policy

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Some of the key principles of the EU food safety system :

- integrated approach for farm to fork
- harmonized legislation for all 28 Member States
- Food Business Operators (FBO) are primary responsible of the safety of their products
- each Member State is responsible for ensuring good implementation of EU legislation





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Architecture of Hygiene Package regulations

FOOD LAW (règlement n°178/2002)

FEED

FOOD

(including retail)

*FOOD of
animal origin*

Industry

Règlement
183/2005

Règlement
852/2004

Règlement
853/2004

*Competent
authority*

Règlement
882/2004
« *contrôles officiels* »

Règlement
854/2004

Official controls frequency based on risk
analysis





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Evolution of risk management principles

Old system

Detailed command and controls requirements

Random sampling of end products

New approach

Responsibility of Food Business operators (FBO)

Results objectives

Preventative actions
(Safety control plan (SCP) : GHP, HACCP)

From food safety system based on **hazard** management

to

Food safety system based on **risk** management





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Each FBO must prepare its own Sanitary control plan (SCP) :

- ✓ Tool to ensure the safety of products placed on the market
- ✓ Internal reference for the company, to be audited by competent authorities
- ✓ Can refer to GHP and HACCP implementation Guidelines but must be adapted to actual company activities



SCP

Must address **biological, physical and chemical hazards**

Required elements to implement and document (records) :

Traceability and
withdrawal / recall
procedures of non
compliant products

Procedures based on
HACCP principles

GHP or pre-requisite

**Validation, Monitoring and
Verification** of efficacy of
control measures

**GHP and
HACCP**
implementation
guidelines

Self checks Plan





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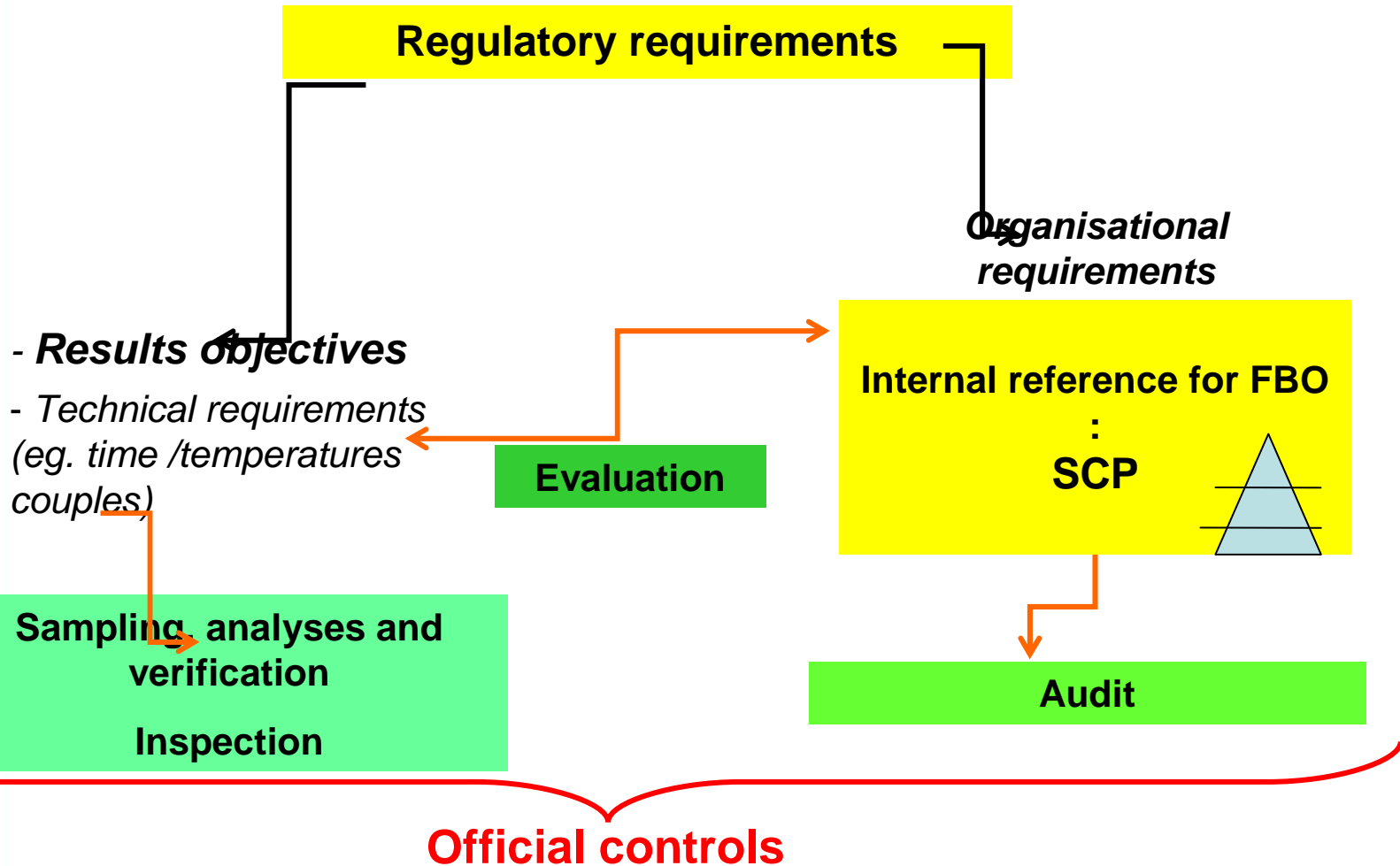
1. What food businesses are expected to do under EU legislation (« Hygiene package »)

2. Competent Authority supervision and official controls policy in France

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Hygiene package Regulations



- Results objectives
- Technical requirements (eg. time /temperatures couples)

Sampling analyses and verification
Inspection

Frequency based on Risk analysis

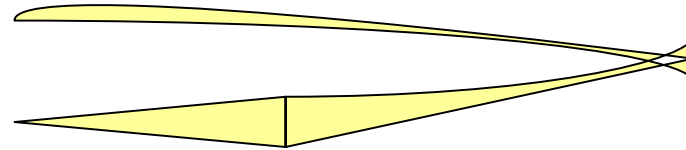




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Legislation / requirements

Roles of FBO and Competent authority



FBO

- Validation of hazard analysis
- Validation of control measures
- implementation of SCP monitoring and verification of its efficiency

Competent Authority

- Verification that FBO validated their hazard analysis and control measures
- Verification that FBO effectively implement their SCP
- Verification that FBO verify the efficiency of their SCP

Self checks Plan

Tool box : GHP Guidelines,
technical documentation for
technical centers,...

Methods =
Guide for Audit and Evaluation
Inspection vademecum and Grids

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Inspection scheduling based on risk analysis

- **Scheduling based on risk analysis is an UE legislation requirement (article 3 of Regulation (EC) n°882/2004) :**
“Adequate frequency” depending on history of controls, specific risks linked to products, processes...
- **Accreditation (ISO 17020) of French Official Inspection Body (DGAL and 100 field offices) : March 2010**
-> also a requirement under ISO 17020 accreditation to have a tool to schedule inspections according to risk analysis



Risk classification of establishments

A = Theoretical risk
by establishment category
(10 à 40)

b = Production volume
(1 à 4)

S = Consumer sensitivity
(1 ou 2)

$$Nr = A \times b \times S \times M$$

M = Grade of inspection grid (1 à 4)

➤ Risk grade Nr defines **4 risk categories** :

☐ risk category : **I** (very low risk) to **IV**
(High risk)

☐ adaptation of **inspection frequency**

➤ Thresholds set at local level **except for category IV** (Nr ☐ 480)
and category III (200 ☐ Nr < 480)





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A level – Meat products

| | |
|------|---|
| A=10 | |
| A=15 | <ul style="list-style-type: none">- Dried meat products, shelf stable- Canned meat products, shelf stable (approved establishment) |
| A=20 | |
| A=25 | <ul style="list-style-type: none">- Treated stomach, bladders and intestines- Gelatine (excepted produced by bones)- Canned meat products, shelf stable (farm approved establishment) |
| A=30 | <ul style="list-style-type: none">- Rendered animal fats and greaves- Heated meat products, not post-lethality exposed, not shelf stable (ex : deli products vacuum packed)- Meat products not shelf stable, intended to be cooked before consumption (ex: chipolata sausage)- Raw material collection intended to produce gelatine and collagen |
| A=35 | <ul style="list-style-type: none">- Smoked/salted/dried meat products, not shelf stable, ready to eat- Meat products not shelf stable, ready to eat- Meat preparations |
| A=40 | <ul style="list-style-type: none">- Gelatine produced by bones- Meat products, post-lethality exposed, ready to eat- Sliced meat products, in retail package, ready to eat- Mechanically separated meat- Minced meat |

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B level – meat and meat products

Minced meat and meat preparation (domestic ungulates) :

- Production \leq 100 t/anb = 1
- 100 < production \leq 1.000 t/anb = 2
- 1 000 < production \leq 2 000 t/anb = 3
- Production > 2 000 t/anb = 4

Meat products (domestic ungulates, poultry) :

- Production \leq 50 t/anb = 1
- 50 < production \leq 500 t/anb = 2
- 500 < production \leq 5 000 t/anb = 3
- Production > 5 000 t/anb = 4

Dérogation to approval : b = 1



Inspection Policy / priorities

Five year cycle : 2011 - 2015

- **All establishments are concerned => risk category I – IV**
- **All inspections reports are on the database Sigal**
- Inspections/actions are carried out under **3 modes : prevention, improvement, repression**
- **Targeted control points** defined for each mode of action except prevention
- Food sector chosen by field offices (except prevention)
- **Specific tools for field offices :**
 - ☐ **Method instructions** defining control points to be targeted
 - ☐ **memos** providing background, purposes and methodology
- **Communication with FBO organisations before and after each year, to present results and control policy evolution**





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Inspections carried out under **prevention** mode

✓ Based on risk analysis, they depend on usual scheduling of inspections, in areas **having constant risk**

☐ establishments requiring continuous monitoring

✓ Inspection frequency fixed at national level:

☐ the volume of inspections is incompressible

✓ inspection processed « conventionally » :

⇒ control points defined according to the risk analysis of the inspector

⇒ overall assessment of SCP during a scheduling cycle





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Inspections carried out under prevention mode

- ✓ **Risk category IV** ($Nr \geq 480$) – all establishments : **2 /year** minimum
- ✓ **Risk category III** ($480 > Nr \geq 200$) – approved establishments : **1 /year** minimum
- ✓ **Risk categories I & II** ($Nr < 200$) – approved establishments : **1 /3 years** minimum

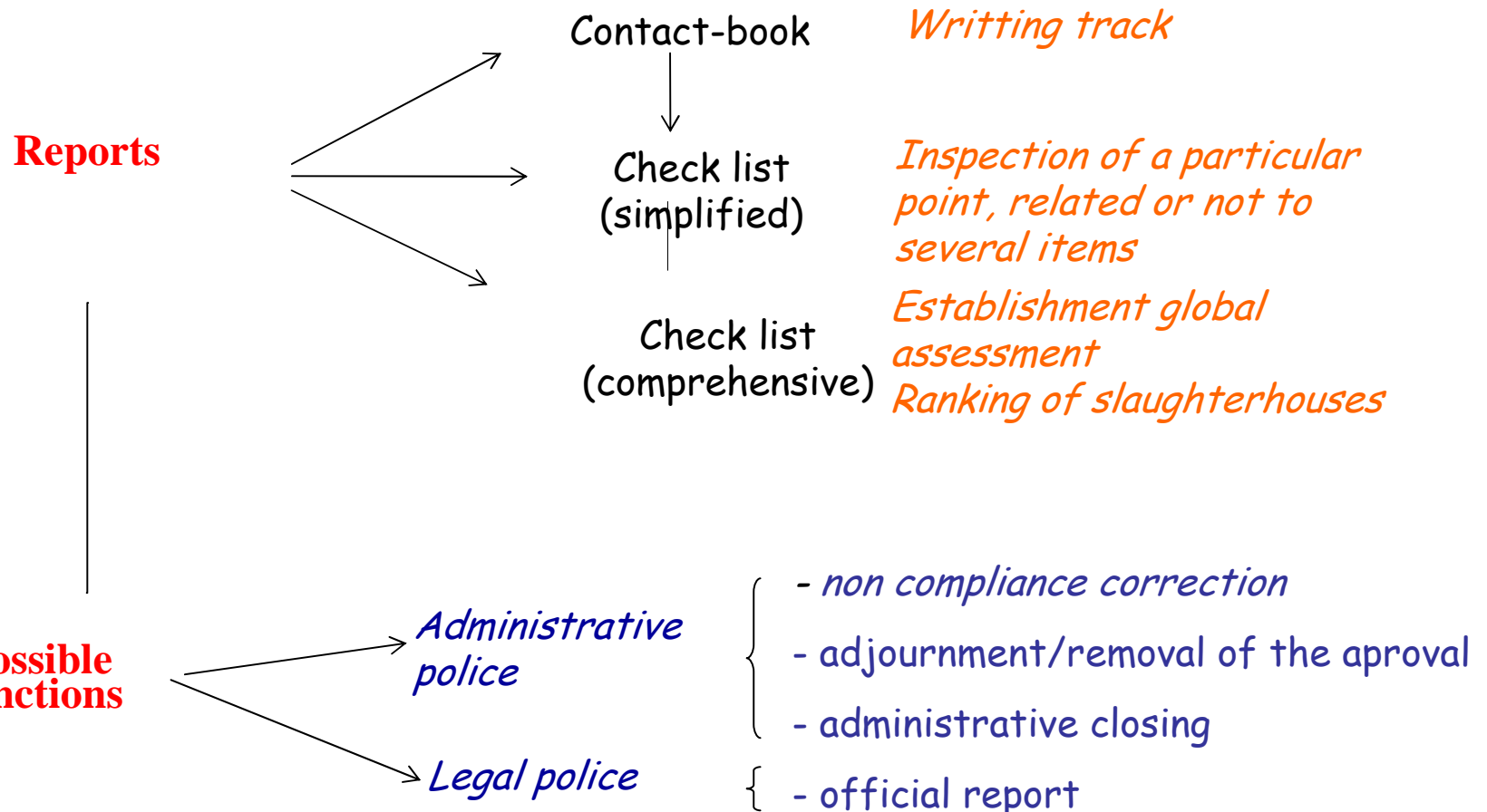


Type and programming of the inspection

- ✓ « Establishment » complete inspections – done by the OV: allow slaughterhouses' ranking
- Review of approval folder, control of the Sanitary Control Plan (SCP), condition of the buildings
- ✓ Punctual or thematic inspections - done by OV or OA
- Monitoring of non-compliance
- Control of critical points : inspection's « mini-grids » (inspection check list)
- ✓ Permanent « product » inspection inseparable from « establishment » inspection: notion of inspectors' contact book



Methods and tools of the inspection



Harmonized inspection methods

- Training of inspectors :
 - ✓ initial and continuous training in a dedicated vocational school (national vocational school for veterinary services, ENSV), collaborative center for OIE
- National instructions issued by DGAL
 - ✓ Inspection Guide line for each sector of production
- Inspection check-list
 - ✓ simplified (on one or several specific topics) / comprehensive
- Electronic report into a national centralised database
 - ✓ SIGAL = report available immediately at central level





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VetAgro Sup



Ecole Nationale
des Services Vétérinaires
The Collaborative Centre
for the Training of Official Veterinarians



OIE
Centre collaborateur de l'OIE
pour la formation des vétérinaires
des OIE Collaborating Centre
for the Training of Official Veterinarians



France
Vétérinaire
International
Assistance Technique France

English Speaking Summer School

"Food safety for products of animal origin: International and european management and control"

Context:

In a globalized context, characterized by more and more international trade and less trade barriers, management of sanitary hazards in food products is a real challenge. Through its Sanitary and Phyto-Sanitary Agreement, the World Trade Organization (WTO) recognises the interest of international standards relative to food safety and risk management to allow an international trade of food products respecting consumer's health. In the food safety field, Codex Alimentarius is recognized by WTO as the relevant International Standard Setting Body.

- At European scale, sanitary regulations are harmonised, and based



Projected Period:

2014, June 2nd – July 4th

Location:

Ecole Nationale des Services
Vétérinaires – ENSV
Lyon, Marcy l'Etoile
Journey to Geneva, Paris,
Brussels

Public:

- Public sector Veterinarians
- Executives of Veterinary Authority
- Veterinary inspectors
- Quality manager in agrifood plants

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Harmonized inspection methods : Check list

Grille SSA-PDTSL : Laits et Produits laitiers (y compris lait traité thermiquement) Version 4

| ITEM | Description | Result |
|----------|--|-----------------|
| Code | Libellé | Résultat |
| A | Locaux | Notation |
| A01 | Environnement,abords,existence,conception, superficie,sectorisation des locaux | Notation |
| A02 | Circuits denrées, personnel, déchets | Notation |
| A03 | Aptitude au nettoyage et à la désinfection | Notation |
| A04 | Maintenance | Notation |
| A05 | Circuits d'air, prévention condensation, contaminations aéroportées | Notation |
| A06 | Prévention de l'introduction des nuisibles | Notation |
| A07 | Température | Notation |
| A08 | Points eau, séparation, identification différents circuits eau potable-non potable | Notation |
| A09 | Evacuation des eaux usées | Notation |
| A10 | Eclairage | Notation |
| B | Équipement | Notation |
| B01 | Lave-mains et autres équipements de nettoyage-désinfection pour le personnel | Notation |
| B02 | Systèmes de nettoyage-désinfection (N_D) pour les locaux et équipements | Notation |
| B03 | Equipements n'entrant pas en contact avec les denrées | Notation |
| B04 | Equipements entrant en contact avec les denrées ou en surplomb des denrées | Notation |
| B05 | Système de contrôle des équipements | Notation |
| B06 | Engins de transport des denrées appartenant à l'établissement | Notation |
| B07 | Equipements relatifs aux déchets | Notation |
| C | Personnel | Notation |

Inspection field
(i.e. Dairy) ;
version reference

Point of
inspection (i.e.
building,
equipments,
staff, process, ...)

Inspection item
number

Short description
of the item

Expected result
of inspection
(note)



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Harmonized inspection methods : Guide lines (1)



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DGAL

VADE-MECUM

LAIT ET PRODUITS LAITIERS

Inspection field (i.e dairy)

Version Publiée : 2.01 Date : 20/12/13

Version Grille : 4

Version reference

◆ *Champ d'application*

◆ *Champ réglementaire*

- Règlement (CEE/CE)-CE/178/2002 : REGLEMENT (CE) N° 178/2002 DU PARLEMENT EUROPEEN ET DU CONSEIL du 28 janvier 2002 établissant les principes généraux et les prescriptions générales de la législation alimentaire, instituant l'Autorité européenne de sécurité des aliments et fixant des procédures relatives à la sécurité des denrées alimentaires
- REGLEMENT (CE) N° 852/2004 du 29 avril 2004 : REGLEMENT (CE) N° 852/2004 du 29 avril 2004 relatif à l'hygiène des denrées alimentaires
- Règlement (CEE/CE) CE/853/2004 : REGLEMENT (CE) N° 853/2004 DU PARLEMENT EUROPEEN

List of
regulatory texts

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Harmonized inspection methods : Guide lines (2)

Part II : Instruction on how to use the Guide line

For each item of the check list, 4 main specifications :

- Regulatory aim: aim that the FBO shall target and respect
- Expected situation : 2 cases :
 - Either the means to be used by the FBO to reach the regulatory target are specified by the regulation , then Guide line described what is expected regarding the use of those regulatory means
 - Either the regulation give an obligation of result but the means are up to the FBO : then the Guide line give exemples of common practices observed in the field by inspectors. But FBO is free to use other methods, as long as he can demonstrated the equivalence to reach the expected result.
- Flexibility : indicates if there is a range of flexibility possible
- Methodology : indicates to the inspector the methodology to be used to control the specified item, and if required how to give the final notation for the item





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Harmonized inspection methods : Guide lines (3)

Part III : Check List

Part IV : description for each item of the check-list of the 4 mains specifications

LIGNE A01LQ1 : ENVIRONNEMENT, ABORD

Item reference and short name

Regulation applicable

Extraits de textes

◆ CEE/Réglemmentation

REGLEMENT (CE) N° 852/2004 du 29 avril 2004 relatif à l'hygiène des denrées alimentaires - Annexe II
Chapitre 1 point 2 c

2. Par leur agencement..., leur emplacement et leurs dimensions, les locaux utilisés pour les denrées alimentaires doivent :
c) permettre la mise en oeuvre de bonnes pratiques d'hygiène, notamment prévenir la contamination et en particulier lutter contre les organismes nuisibles ;

Aide à l'inspection

◆ Objectif

Prévenir les risques de contaminations dus à l'environnement.

◆ Situation Attendue

Une attention particulière sera portée aux abords de l'entreprise : pas d'activités polluantes dans le voisinage, absence de mare, de zone boueuse, absence de dépôts de déchets, absence de friches (cas des fermiers : atelier suffisamment séparé des zones de dépôts de déjection). L'accès au site doit être sécurisé, notamment pour les zones de stockages de produits alimentaires (citernes, hâloirs, expéditions)...

◆ Flexibilité

Aucune

◆ Méthodologie

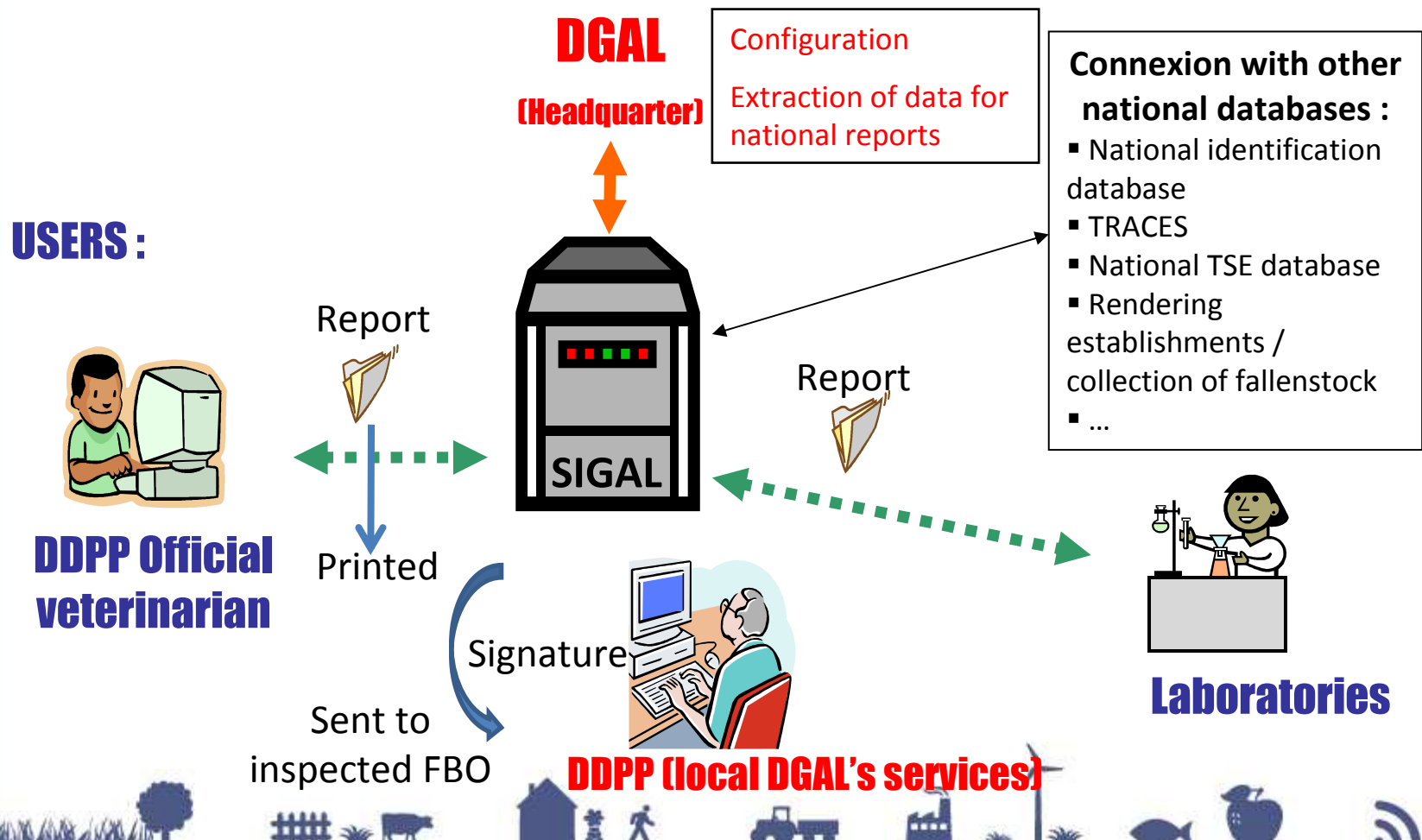
- Faire le tour du bâtiment,
- Recenser les sources de contamination potentielle,
- Vérifier l'emplacement de la fumière ou celui du tas de fumier par rapport aux vents dominants,
- Vérifier l'efficacité des moyens de maîtrise mis en oeuvre.
Lors de la création d'un établissement, faire attention également aux activités exercées et aux sources de contaminations potentielles sur les terrains limitrophes (bâtiment situé dans une zone non exposée à des matières polluantes, des fumées, à l'habitat des infestations par des nuisibles ou en présence de nuisances (sonores, ...)

- Regulatory aim:
- Expected situation
- Flexibility :
- Methodology



Harmonized inspection methods : electronic report into a national database (SIGAL)

SIGAL aims to manage all data-processing of the veterinary services activities related to food safety, animal health, animal welfare and environmental protection.





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Food Safety Inspections : Export approval of establishments

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Regulations

Approval by
competent authority

EU Legislation

UE approval

+

+

Specific requirements
Country Legislation

Export approval

List of approved establishments /
export products to third countries





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