EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR HEALTH AND FOOD SAFETY

Health and food audits and analysis

DG(SANTE) 2019-6681

# FINAL REPORT OF AN AUDIT
# CARRIED OUT IN
# CANADA
# FROM 09 SEPTEMBER 2019 TO 20 SEPTEMBER 2019
# IN ORDER TO
# EVALUATE THE CONTROL SYSTEMS IN PLACE GOVERNING THE PRODUCTION OF BOVINE AND PIG MEAT INTENDED FOR EXPORT TO THE EUROPEAN UNION

***In response to information provided by the competent authority, any factual error noted in the draft report has been corrected; any clarification appears in the form of a footnote.***

***Executive Summary***

*The report describes the outcome of an audit carried out by Directorate-General for Health and Food Safety in Canada from 9 to 20 September 2019 to review the structure and operation of control systems in the meat sector (fresh meat obtained from cattle and pigs not fed with growth enhancing products) for export to the EU and, in this context, to assess the implementation of the national programmes intended to ensure that the meat originates from animals to which no growth enhancing products have been administered.*

*The new Canadian legislation "Safe Food for Canadians Regulations" entered into force in 2019, repealing and consolidating previous national provisions, but did not significantly change the relevant requirements.*

*The different authorities involved in the controls are clearly designated; however, a potential conflict of interest is not adequately addressed with regard to private veterinarians, accredited with the competent authorities to evaluate the adherence of pig/cattle holdings and cattle feedlots with the requirements of both hormone-free programmes. Such veterinarians are paid by the operators subject to their controls, while also providing zootechnical and sanitary assistance to them.*

*The current system implemented by the competent authorities to evaluate the compliance of food establishments with the Canadian legislation and the additional EU provisions is not able to provide the guarantees that only fully compliant establishments continue to be listed for export to the EU; the system does not adequately reflect the real conditions of structure and hygiene in the federally registered establishments listed for export. Only one out of the three establishments visited by the audit team could be considered fully compliant, while for another one of the three the audit team requested written guarantees on suspension of certification for export to the EU, and de-listing. The corrective actions announced and implemented following the previous audit in 2014, and aimed at providing assurances as regards continued compliance of EU-listed establishments with the relevant requirements, have not been effective.*

*With regard to the pig meat sector, the situation can be assessed as globally satisfactory: in Canada more than 95% of all pigs are ractopamine-free.*

*By contrast, in the beef sector, most of the corrective actions announced by the Central Competent Authority (CCA) in its action plan aimed at addressing recommendation No 1 of the 2014 audit report which concerned the guarantees in respect of traceability and EU-eligibility for the purposes of the hormone-free programme, have not been implemented: the two existing computerised databases are not yet fully interconnected, movements of cattle (with the exception of movements to slaughter and initial identification at the holding of birth) are not notified and no controls are performed over the use of official ear-tags delivered to the holdings.*

*Thus, traceability of EU-eligible cattle mainly relies on hard copies of movement documents and certificates, which were found in several cases to be incomplete, or containing erroneous information while at the same time, traceability and eligibility controls at farm level also demonstrated deficiencies.*

*The report contains recommendations to the Canadian CCA to address the identified shortcomings.*

## Table of Contents

**ABBREVIATIONS AND DEFINITIONS USED IN THIS REPORT**

| Abbreviation | Explanation |
|---|---|
| AVs | CFIA accredited veterinarians |
| CAR | Corrective Action Request |
| CPC | Canadian Pork Council |
| CPE | Canadian Pork Excellence program |
| CQA | Canadian Quality Assurance |
| CRFPCP | Canadian Ractopamine-Free Pork Certification Program |
| CCA | Central Competent Authority |
| CETA | Comprehensive Economic and Trade Agreement |
| CFIA | Canadian Food Inspection Agency |
| CLTS | Canadian Livestock Tracking System |
| CVS | Compliance Verification System |
| DG SANTE | Directorate General for Health and Food Safety |
| EU | European Union |
| FBO | Food Business Operator |
| FSEP | Food Safety Enhancement Program |
| GEPs | Growth Enhancing Products |
| HACCP | Hazard Analysis and Critical Control Points |
| MHMOP | Meat Hygiene Manual of Procedures |
| MI | Meat inspector (official auxiliary staff) |
| OIE | World Organisation for Animal Health |
| PID | Property Identification number |
| PigTRACE | A national database for porcine animals |
| PCP | Preventive Control Plan |
| SFCR | Safe Food for Canadians Regulations |
| TNIP | Traceability National Information Portal |
| VIC | Veterinarian-In-Charge (official veterinarian) |

## 1 INTRODUCTION

The audit took place in Canada from 9 to 20 September 2019. The audit was undertaken as part of the Directorate General for Health and Food Safety (DG SANTE) planned audit programme. The audit team comprised two auditors and was accompanied during the audit by representatives from the Central Competent Authority (CCA), the Canadian Food Inspection Agency (CFIA), representatives of the regional CFIA offices, and by officials of the provincial authorities.

An opening meeting was held on 9 September 2019 in Montreal with the CFIA. At this meeting the audit team confirmed the scope of and itinerary for the audit, and additional information required for the satisfactory completion of the audit was requested.

## 2 OBJECTIVES AND SCOPE

- The objective of the audit was: to evaluate the implementation of official controls and the enforcement of the sanitary measures in place intended to ensure the fulfilment of the requirements applicable to exports to the EU of fresh meat from bovine (cattle) and porcine animals and, in this context, to assess the implementation of the national programmes intended to ensure that such meat originates from animals to which no Growth Enhancing Products (GEPs) have been administered; and, in this context,
- to verify the effectiveness of corrective actions submitted to the Commission services in response to relevant recommendations contained in the report of the previous 2014 audit covering bovine meat and pork; ref. DG(SANTE)/2014-7216 MR-FINAL (hereafter: the 2014 report).

In terms of scope, the audit included the verification of controls over the ban of use of GEPs in animals destined to production of fresh meat certified for export to the European Union (EU), as set out in the model certificates "BOV" and "POR" laid down in Commission Regulation (EU) No 206/2010.

In pursuit of the objective, the following sites were visited:

| **COMPETENT AUTHORITIES** | | | **COMMENTS** |
|---|---|---|---|
| **COMPETENT AUTHORITIES** | **Central** | **2** | Opening and closing meetings |
| | **Provincial/Regional** | **2** | One office, and representatives on-site |
| | **District/Local** | **4** | One office, representatives on-site |
| **FOOD PRODUCTION / PROCESSING / LIVE ANIMALS / VETERINARY MEDICAL PRODUCTS - ACTIVITIES** | | | |
| **Slaughterhouses** | | **3** | Two for pigs and one for cattle |
| **Cutting plants** | | **3** | Co-located |
| **Cold stores** | | **1** | Stand alone |
| **Livestock holdings** | | **2** | One pig farm and one cattle farm |
| **Feedlots** | | **2** | Beef (one keeping GEPs-free and GEPs-treated cattle) |
| **Feedmills** | | **1** | Producing feed for porcine animals |

## 3 LEGAL BASIS

The audit was carried out under the general provisions of the EU legislation, and in particular Article 46 of Regulation (EC) No 882/2004 of the European Parliament and of the Council on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules, and Article 5.8 of the *Comprehensive Economic and Trade Agreement between Canada, the European Union and its member states* (hereafter referred to as CETA), made applicable on a provisional basis by Council Decision (EU) 2017/38.

A full list of the EU legal instruments relevant to the scope of this audit is provided in Annex I to this report. Legal acts quoted refer, where applicable, to the last amended version.

## 4 BACKGROUND

On 28 October 2016, the Council adopted a package of decisions on the CETA, including:

- a Decision on the signing of the agreement (Council Decision (EU) 2017/37 of 28 October 2016);
- a Decision on the provisional application of the agreement (Council Decision (EU) 2017/38 of 28 October 2016).

Chapters and Annexes of the CETA applicable to this audit are referred to in the relevant chapters/sections of this report. Annex 5-E of the CETA contains, *inter alia*, the list of live animals and animal products for which equivalence of sanitary measures has been established for trade purposes (e.g. public health requirements in respect of fresh meat from bovine and porcine animals), including special conditions listed in Appendix A. In the context of exports from Canada to the EU, the CETA (Annex 5-I, par. 3) provides that "until certificates on the basis of equivalence have been adopted, existing certification shall continue to be used".

Details concerning the animal health situation in Canada can be found at the World Organisation for Animal Health (OIE) website: http://www.oie.int/. According to the OIE a number of diseases affecting cattle and pigs have never occurred or have not occurred for almost 50 years. Sporadic cases of trichinellosis in wildlife (eight cases between 2012 and 2018) have been recorded in the past.

The previous audit to review the structure and operation of control systems in Canada's meat sector for export to the EU with particular focus on beef and pig meat was carried out in May 2014, the results of which are described in the 2014 report. This report, together with the Ca responses to the report recommendations, is published on the Commission website at: http://ec.europa.eu/food/audits-analysis/audit_reports/details.cfm?rep_id=3442.

In response to the recommendations of the above report, the Canadian authorities undertook to take actions to enhance the robustness of the traceability and of the GEPs freedom programs for cattle, and to regularly review all EU-approved establishments for assessment of their compliance with the relevant requirements.

# 5 FINDINGS AND CONCLUSIONS

## 5.1 LEGISLATION AND IMPLEMENTING MEASURES

### Legal requirements

Article 46 (1) (a) of Regulation (EC) No 882/2004.

Annex 5-A, B,D, E, F, I and J of the CETA.

### Findings

1. CETA establishes equivalence only in relation to public health requirements for fresh meat from cattle and porcine animals, with some additional special conditions for production of such meat when destined for export to the EU: Appendix A of Annex 5-E includes *inter alia* compliance with EU rules on carcase decontamination, *ante-mortem* and *post-mortem* inspections, products testing requirements for E. coli and Salmonella for the United States of America – USA (as written in Annex T: Testing for *Escherichia coli* (E. coli) in Slaughter Establishments and Annex U: USDA Performance Standards for Salmonella of USA section of Chapter 11 of the CFIA's Meat Hygiene Manual of Procedures), testing for *Trichinella* or cold treatment for pig meat, and EU microbiological food safety criteria.

2. Multiple food-related acts have been consolidated into one single act, the *Safe Food for Canadians Regulations* (SFCR), which entered into force on January 15, 2019 and replaced 14 sets of regulations (among others, the Meat Inspection Act and the Meat Inspection Regulations). Under the SFCR, new licensing (SFCR – Part 3), preventive control and traceability requirements are made to apply to food businesses. For instance, Part 4 of the SFCR requires certain food businesses to have a written Preventive Control Plan – PCP - to prevent, eliminate or reduce to an acceptable (safe) level hazards associated with food products ( programme based on the HACCP principles and on pre-requisites). General trade requirements (SFCR – Part 2) and specific foreign countries' requirements (SFCR – Part 6, Division 7, Subdivision L) must also be met by meat exporters. SFCR no longer requires the mandatory health marking ("meat inspection legend") of carcases, if they are subsequently cut on-site.

3. The SFCR contains the explicit authority to incorporate any document into it, regardless of its source; this allows bringing the content of a document into regulation, without the need to reproduce the document in the regulation itself. In this way, the content thus incorporated into the SFCR has the same legal power. Provided certain requirements are met, CFIA has the authority to use "incorporation by reference" in the regulations to reduce unnecessary regulatory burden, provide clarity and flexibility, and support innovation and changes in science and technology.

4. Information on the SFCR was provided to DG SANTE in May 2018 and to the Market Access Working Group in July 2018. The CCA stated that all changes are of a technical

nature, and that no changes of content took place, although the new provisions no longer foresee the health marking as per paragraph 2, above.

5. Following the entry in force of the SFCR, the Meat Hygiene Manual of Procedures (MHMOP) has been replaced by a new suite of guidance documents, accessible on the CFIA website. This suite includes requirements for *ante-mortem* and *post-mortem* examination, animal welfare, preventive control requirements for biological hazards, traceability, etc. that must be implemented by the food business operators (FBOs). Additional guidance documents (e.g. *Trichinella* carcase testing methods, a generic swine HACCP model, and refrigeration requirements for red meat) are under development; in the *interim*, the MHMOP may still be used for reference. More details about the guidance are given in the relevant sections of this report, as appropriate.

6. The Health of Animals Act and Regulations require mandatory individual identification of bovine and porcine animals. A national database for cattle is managed by the Canadian Cattle Identification Agency (CCIA), with the exception of Québec, where a separate database for cervids, bovine and ovine animals (*Agri-Traçabilité Québec* – ATQ) is operational. For porcine animals a national database (PigTRACE) is managed by the Canadian Pork Council (CPC). More details on the functioning of these databases are, where relevant, provided in the relevant sections of this report.

7. Details on the different programmes allowing the production and certification of GEPs-free beef and ractopamine-free pig-meat for export to the EU are provided in the relevant sections of this report.

8. EU-eligible animals slaughtered in EU-listed, federally registered slaughterhouses are subject to a CFIA sampling programme to monitor compliance with the CETA requirements; standard sampling programme procedures established under the National Chemical Residue Monitoring Program need to be adhered to. The sampling plan is updated on a yearly basis, or as needed (e.g. in case of approval of a new establishment for export of beef to the EU).

9. In Québec, provincial legislation (e.g. the *Loi sur la protection sanitaire des animaux* – 1986) applies to primary production. In particular, it deals with the prohibition to sell animals destined for human consumption to which prohibited substances have been administered, or meat containing residues of veterinary medicinal products (VMPs) above the maximum residue level (MRL). When residues are detected in a slaughtered animal, inspections on-site, movement restrictions at the holding of origin and other enforcement measures may be imposed, and contravening operators may be sanctioned. Although similar legal acts were not provided during the visit in Alberta, the provincial CA stated that official controls on primary production are regulated by provincial legislation.

**Conclusions on legislation and implementing measures**

10. Equivalence in relation to public health requirements for fresh meat from bovine and porcine animals is established, with certain additional conditions for production of such meat when destined for export to the EU. Provincial legislation, which includes enforcement provisions, seems to apply to primary production. However, evidence was only provided for Québec province.

11. The provisions introduced by the SFCR are of a technical nature and no relevant changes of content were introduced, even if the health marking of carcases having passed the *post-mortem* inspection and destined for further cutting, is no longer required.

### 5.2 COMPETENT AUTHORITIES

**Legal requirements**

Article 46 (1) of Regulation (EC) No 882/2004.

Article 5.7 (3) and Annex 5-A of the CETA.

**Findings**

12. The structure and responsibilities of the competent authorities in Canada involved in the production of fresh meat are described in detail in audit report DG (SANTE)/2018-6458. The CFIA has the overarching responsibility to verify and where necessary enforce that the requirements of the GEPs-free programmes are adhered to.

13. With regards to the production of pig meat the following authorities/organisations are involved in controls:

    a. CFIA's Animal Feed Division receives and registers applications from FBOs running feed manufacturing facilities, for enrolment in the ractopamine-free programme. This concerns mainly pig feed manufactures, as cattle holdings manufacture their own feed on site;

    b. CFIA feed inspection staff inspect commercial feed facilities at a risk-based frequency, to verify conformity to programme requirements. Premises manufacturing pig feed are inspected between once and three times per year. As cattle farmers prepare the feed needed themselves, only on-farm feed-mills are inspected: if the facilities prepare complex feed for their own use, the minimum frequency is one visit every three years, but if the feed produced is also sold to other holdings, they are inspected once a year.

    c. Third party organisations are responsible for controls over the production of pig meat, to determine whether the controls implemented meet the requirements of the programme. They are contracted by FBOs enrolled in the programme and must be independent from the customer-supplier relationship as well as from the audited

organisation and its customers. Such parties can e.g. be the Canadian Quality Assurance (CQA) inspectors (see below).

d. The Canadian Pork Council (CPC) develops and delivers the CQA programme in pig farms (recently re-named as "Canadian Pork Excellence"), which is a pre-requisite for being enrolled in the ractopamine-free programme (a pre-condition for exporting pork to the EU). Third party auditors are in charge of the verification of the compliance of producers with the requirements of this programme, through annual visits.

14. With regards to the production of bovine meat, the following authorities/organisations are involved in controls:

a. Official staff at the level of District Veterinary Offices (DVOs) receive and approve cattle keepers' enrolment applications for joining the Canadian Program for Certifying Freedom from Growth Enhancing Products – GEPs – for the Export of Beef to the European Union – EU (a pre-condition for exporting beef to the EU).

b. CFIA accredited veterinarians (AVs) are responsible for initial enrolment inspections (reports are forwarded to the DVOs for approval) and for subsequent routine inspections to verify compliance with the requirements of the programme: cow/calves holdings are inspected once a year, the feedlots twice a year. CFIA accreditation is valid for three years and must be renewed, if necessary after further training on the implementation of the programme in the event of shortcomings.

15. AVs are audited annually by the DVOs to evaluate their performance; this audit generally includes also an audit of the farms/feedlots.

16. No particular guarantees are required by the CAs to verify the absence of conflict of interest([1])/level of performance of the AVs: these veterinarians are paid by the controlled operators and are also providing zoo-technical and sanitary assistance to them. The Code of Conduct and the Conflict of Interest and Post-Employment Code of CFIA deal with potential situations of conflict of interest, defined as any situation in which personal assets, interests or activities affect in any way, or have the potential to appear to affect, the honest, impartial performance of an employee's duties or their judgement to act in the public interest. The low performance in the assessment of the adherence to the programme by a farmer was not identified during the annual audit of the GEP-Free approved veterinarian carried out by the CFIA District Office personnel.

**Conclusions on competent authorities**

17. CAs are designed and structured to fulfil their obligations in respect of verification of compliance of participants in the hormone-free programmes.

18. No particular arrangements are in place to prevent/address low levels of performance

([1]) In their response to the draft report the Competent Authority noted that GEP-Free accredited veterinarians are not allowed to register their own cattle within the programme.

on the part of the AVs.

### 5.3 LISTING OF ESTABLISHMENTS

**Legal requirements**

Article 12 of Regulation (EC) No 854/2004 of the European Parliament and of the Council.

Article 5.7 (4) and Annex 5-F of the CETA.

**Findings**

19. The SFCR has set requirements/procedures for licensing and listing of establishments: when approvals granted based on the repealed legislation expire (usually two years after their issue), FBOs are required to apply for licensing of their premises under the SFCR. The licence lists the groups of products covered and the authorised trade (inter-provincial, import and/or export). Compliance with the Canadian regulatory requirements (among others, those of the SFCR) is a condition to maintain the licence.

20. The Compliance Verification System (CVS) is the tool used by official staff to evaluate compliance of FBOs with the applicable (national, and CETA) requirements. It includes a series of tasks to be completed at a set frequency, while others are triggered by the findings of official staff (Veterinarians-In-Charge – VICs, and Meat Inspectors - MIs). Findings deemed relevant by VIC/MI can lead to a Corrective Action Request (CAR) with a maximum deadline of 60 days; officials have an additional 30 days to ensure follow-up. Minor deficiencies are recorded in the Verification Reports and discussed weekly with the FBOs.

21. As announced in response to Recommendation 6 of the 2014 report, which requested a regular review of the EU eligibility of EU-listed establishments as well as the maintenance of updated lists of these establishments, an annual assessment of EU-listed establishments is carried out by CFIA, usually by the VIC, and documented through completion of form "Annex M". The establishments continue to be listed for export to the EU if the assessment confirms that the conditions for listing are maintained.

22. From the CVS findings, the actual level of compliance of two out of three slaughterhouses visited was difficult to establish by the audit team; most of the completed/recorded tasks focused on the presence of FBOs' records and procedures. Many of the structural and of the operational hygiene deficiencies noted by the audit team were mentioned neither in the CVS records, nor in the Verification Reports and/or in the worksheets (see paragraphs 79, 80, 93 and 94).

23. The audit team found that only one of the three slaughterhouses visited could be considered as overall compliant, albeit with some minor deficiencies (see chapter 5.6.3).

24. One establishment initially chosen by the audit team for a visit requested to be delisted by the CCA, shortly before the commencement of the audit and thus was not included in the itinerary.

25. The audit team also visited an EU-approved cold store in which the pig meat intended for export to the EU undergoes a freezing treatment for *Trichinella* prevention. Although the premises were found to be in satisfactory condition, the procedures drafted and implemented by the FBO showed deficiencies (see chapter 5.6.6) which were immediately addressed by the operator.

**Conclusions on listing of establishments**

26. The control system in place does not provide assurance that only fully compliant food processing establishments are listed, or maintained on the list for export to the EU. Therefore, the corrective actions announced by the CCA to address the relevant recommendation of the 2014 audit report have, in practice, not been effective in providing that assurance.

### 5.4 HORMONE-FREE PRODUCTION OF BEEF DESTINED FOR EXPORT TO THE EU, AND ITS CONTROLS

**Legal requirements**

Paragraph 3. Annex 5-I of CETA states that "Until certificates on the basis of equivalence have been adopted, existing certification shall continue to be used".

The certification requirements for bovine meat are set out in model certificate "BOV" in part 2 of Annex II to Regulation (EU) No 206/2010. This model certificate implies that a system(s) for holding registration and animal registration should be in place. Also, point II.1.7 of the same certificate stipulates that only meat from animals covered by residue monitoring plans submitted in accordance with Council Directive 96/23/EC and in particular, its Article 29 is eligible for export to the EU.

**Findings**

#### *5.4.1 Holding registration, animal identification and movement controls*

The audit team checked the general cattle registration practice, and the databases linked to that, beyond the GEP-Free programme, due to reasons of integrity, possibility of cross-checking and fraud prevention.

27. The identification process of a premises (intended as a location where farmed animals are kept, assembled or disposed of) consist of providing information on its specific location, animal species kept etc., to the provincial or territorial government where the premises is located. After governmental validation, a Premise Identification (PID) number is allocated and used when documenting the receipt or departure of animals.

28. A national database for cattle (Canadian Livestock Tracking System – CLTS) is managed by the Canadian Cattle Identification Agency (CCIA) and is fully operational in all Canadian Provinces, with the exception of Québec, where a provincial database for cervids, bovine (but not bison) and ovine animals (*Agri-Traçabilité Québec -ATQ*) is in place. The two databases have an interconnection at central level through the Traceability National Information Portal (TNIP) which is currently limited to data identifying the holdings (name, address, species kept, PID). The access to TNIP is granted upon request from users. In response to recommendation No 1 of the 2014 report ([2]), the CCA announced that their objective was to merge the ATQ and CCIA databases by the end of 2016.

29. The databases do not identify the holdings participating in the programme, nor the EU-eligibility of cattle enrolled in the programme. This information is available on hard copies of the relevant documents accompanying movements of animals in the GEP-Free programmes([3]).

30. The databases record the orders of ear-tags by farm stores, their distribution to holdings, the identification of animals with their birth date and their death/slaughter. Replacement tags (linked to the previous identification device) need also to be notified. Recording of movements between holdings and to slaughterhouses is not mandatory and thus notified by the producer on voluntary basis; such movements are mainly documented by paper copies of the movement documents, producers declarations and certificates of compliance issued by AVs based on paperwork. Slaughter declarations, notified by slaughterhouses, are mandatory.

31. Due to the fact that most of the movements of cattle are not subject to mandatory notification to the databases, the real-time location of cattle may not be established by querying the databases. If correctly recorded, this information could be retrieved from hard copies of movement documents kept at holding level and forwarded to the DVOs ([4]) .

32. Moreover, the ATQ database requires movements to be notified within 7 days from the event by all receiving holdings; such an obligation does not exist for dispatching farms, except when animals are sent out from the province. Auctions must notify movement in entry and exit. Currently, there are no cattle operations registered under the GEPs-free programme exist in Quebec, since no holdings are registered in the GEP-Free programme.

---

([2]) Recommendation No.1 of the 2014 Report reads as follows: "*To develop risk based procedures for the audit of the bovine/bison holdings (farms, feedlots, markets, tagging stations) and to include physical checks on the animals in the holdings audited, as well as reconciliation exercises on a routine basis (e.g. ear tags, animal movements, ongoing EU eligibility)*."

([3]) In their response to the draft report the Competent Authority noted that such traceability within these databases is not necessary as part of the EU-approved GEP-Free programme. The reason for the existence of the traceability part of the GEP-Free programme is in recognition of the deficiencies in the databases.

([4]) In their response to the draft report the Competent Authority noted that this finding is referring to the movement of domestic cattle with reference to the CCIA database not GEP-Free cattle. The paper trail was developed due to the inherent deficiencies with the CCIA/ATQ databases.

33. Under provincial regulations, additional events must be reported to the databases: cattle movements and ear-tags applied soon after birth (within seven days, or at maximum five months if born at pasture) in Quebec, receipt of cattle by operators of large feedlots with more than 1000 heads in Alberta.

34. There are no limits to the number of ear-tags that may be purchased by holdings, and no reconciliation is required of their use in new-born calves in relation to the number of mothers. Farmers met by the audit team stated that the replacement rate of lost ear-tags could be approximately 3%, but no reconciliation or alerts in case of abnormal rates of re-identification of animals are carried out, manually or automatically. The GEP-Free programme User's Manual requires the immediate replacement of any lost eartag; however, due to the extensive method of animal keeping at farm level, identification/re-identification of cattle usually occurs at the time animals are gathered/assembled (2-3 times per year).

35. As noted during the previous audit, there are exceptions to the obligation to identify cattle at the first movement from the holding of birth: animals can be moved unidentified to the so called "tagging sites" (usually feedlots and auctions sites), where they will be subsequently ear-tagged. However, such exceptions concern domestic movements, and no cases of their application were seen in the GEP-Free holdings and feedlots visited by the audit team.

36. Double notification of domestic movements by the holdings moving and receiving the animals is not implemented, making it impossible to verify the correctness of notifications, the compliance with reporting deadlines, or to identify unreported movements.

37. In one cow/calf holding visited, at the preliminary documentation review the audit team noted that the records of identification and number of animals (notably cows) were extremely poor: not all animals deemed being present on the holding were reported in the registers, and not all of them were identified by the official tag (most of them were indicated with their holding's tags used for herd management). Neither the reports of the AV, nor the DVO audit report, identified these issues. From the examination of the paper records, the last inventory reported 228 cows, while the computerised records listed 66 cows identified with official ear-tags, and the paper register showed about 180 cows (of which almost 80% identified with a management tag only, and the remaining 20% without identification). The relevant mismatches identified in the documentation presented by the FBO during the DG SANTE audit team visit did not allow to establish the link between the number of mother cows and the number of calves, and can make difficult retrieving the origin of the latter. The DVO committed to carry out an in-depth assessment of the situation at the time of the next assembly of animals (October 2019). Nonetheless, an on-site visit by the audit team established that the majority of animals seen were, as such, correctly identified.

38. In the other cow/calf holding visited, a single document of movement (so-called "transfer certificate") of cattle back from community pasture was not accompanied by the pasture manager's declaration of absence of treatment of animals with GEPs, as required by the programme. Therefore, the chain of guarantees regarding the absence of treatments with GEPs in this case could not be maintained.

39. Records in the cattle feedlots (one of them raising both hormone-free and conventional cattle) visited were in general satisfactory.

*5.4.2 Hormone-free programme*

40. Annex R of the MHMOP (Canadian Program for Certifying Freedom from Growth Enhancing Products – GEPs – for the Export of Beef to the European Union – EU) describes the general requirements for the production and certification of GEPs-free beef products for export. The program has been recently updated and it is available on the CFIA webpage at: http://www.inspection.gc.ca/food/exporting-food/requirements-library/eu-meat-and-poultry-products/annex-r/eng/1462942544704/1462942667141.It is supplemented by a Users' Manual (Annex S) to outline the minimal conditions that will allow meat to be certified for export to the EU.

41. GEPs may be administered by way of implants located in the ears (to be renewed every 90/120 days), or be mixed with the feed (ractopamine and melengestrol acetate). Their purchase by farmers is subject to presentation of a veterinary prescription in Quebec, while they are available over-the-counter in Alberta, by providing the holding PID. The use of GEPs in cattle farming allows, according to the farmers interviewed, weight gains of up to 18% compared to cattle to which no GEPs were administered.

42. According to the CFIA, in total, 92 cow/calf holdings, approximately 50 cattle feedlots and 99,732 animals are currently enrolled in the programme.

43. Movements of animals between holdings, community pastures, feedlots and slaughterhouse must be accompanied by a Transfer Certificate (movement document) and by a valid Certificate of Compliance signed by the AV. An annex bearing the list of animals' ear-tags is also linked to these documents. The audit team could ascertain the correctness of the majority of these records, filed on paper. However, a few transfer certificates seen by the audit team did not have the unique number linking both documents ([5]).

44. Identification of EU-eligible cattle at the slaughterhouse is verified by FBO staff at arrival of the animals and along the slaughter-line. Systematic palpation of both ears and the brisket (where illegal implants may be located) are also performed by FBO staff, and subject to oversight by official staff.

([5]) In their response to the draft report the Competent Authority noted that the documents were found together with similar information and handwriting, dates, etc. on both, thus linking them together, and that this finding was addressed with the GEP-Free approved veterinarian and feedlot operator at the time of the audit.

45. As a general observation, the databases contain little information about movements of cattle. To get the overall picture on animal movements, official staff need to refer to paper documents filled out by the different operators, which are more prone to errors, omission of mandatory information, etc. ([6]). A complete record of movements within the database would assist (e.g. by automatic checks and alerts) in avoiding the issuance of incomplete/incorrect movement documents. The CCA stated that the databases have been designed mainly to track "contact animals" in case of disease outbreaks; however, the current system with limited movement notifications does not allow that tracking to be carried out effectively.

*5.4.3 Official controls*

46. Lists of cow/calf holdings and cattle feedlots enrolled in the programme are only locally available at DVOs, while the CFIA at central level has no records. DVOs keep files of enrolled holdings, including hard copies of movement documentation.

47. The audit team noted that the assessment reports of the holdings visited were not always dated and signed by the AV, as the model provided by the programme does not require this information. Date of inspection and signature, when present, were put on the first page of the report at AV's own initiative.

48. The CFIA send monthly reports on irregularities detected by the database to the DVOs, which are in charge of follow-up. An example was shown to the audit team in which three cattle were slaughtered and were recorded with unaccountable identity (N.B. these cattle had not been dispatched from holdings enrolled in the GEPs –free programme).

49. The traceability programme for cattle adopted a CVS in 2010, to assess the performance of Canadian cattle holdings: 15 verification tasks must be completed at risk-based frequencies by approximately 500 inspectors, to which end they carry out on-site inspections, interviews with operators and consultations of responsible administrators' databases. Enforcement actions can range from the issue of letters on non-compliance, to financial penalties, and to prosecution. The CCA provided the audit team with statistics on these activities carried out in 2018, and focusing on compliance of all inspected cattle holdings, including those enrolled in the GEPs-free programme: out of 189 inspections identifying non-compliances, 49 resulted in formal notices to the FBO, of which 12 resulted in financial penalties totalling 7,575 CAD.

50. The VIC take official samples (kidney, muscle, urine and fat) at slaughterhouse level in the framework of the National Residue Monitoring Programme, which are analysed in accredited private laboratories approved by CFIA. According to the CFIA, no positive results have been notified in the recent past years: the last positive sample for ractopamine metabolite in cattle was notified in 2013, while the three samples found

([6]) In their response to the draft report the Competent Authority noted that the benefits of having a completely functioning database are recognised, which in future may eliminate many of the requirements for traceability within the GEP-Free programme, which currently are indeed there and auditable because of the deficiencies within the databases.

positive for zearalenone and β-zearalenol in 2017 and 2018 were attributed to the consumption of feed contaminated with *Fusarium*, as per instruction from the programme specialist.

**Conclusions on hormone-free beef meat destined for export to the EU, and its controls**

51. The system for traceability of EU-eligible cattle, the meat of which is exported to the EU, showed a number of shortcomings, most of them already identified during the 2014 audit. Cattle databases, intended to support traceability of EU-eligible cattle, contain incomplete information on animal movements, do not allow a comprehensive oversight of traceability of EU-eligible cattle by the CAs and might not show the current location of the animals. For the abovementioned reasons, the databases intended to support traceability of EU-eligible cattle are not reliable, weakening the whole traceability system and consequently the guarantees provided by the CAs in the health certificate.

52. The actions implemented by the Canadian CCA in response to recommendation No. 1 of the 2014 report have not been effective in ensuring that the abovementioned issues were properly addressed.

53. Official controls at the level of primary production (performed by both AVs and DVOs) were also not fully effective at ensuring compliance, as evidenced by the deficiencies found by the audit team which had not been identified during these controls.

### 5.5 RACTOPAMINE-FREE PRODUCTION OF PIG MEAT DESTINED FOR EXPORT TO THE EU, AND ITS CONTROLS

#### Legal requirements

Paragraph 3. Annex 5-I of CETA states that "Until certificates on the basis of equivalence have been adopted, existing certification shall continue to be used".

The certification requirements for pig meat are set out in the "POR" model certificate in part 2 of Annex II to Regulation (EU) No 206/2010. This model certificate implies that a system(s) for holding registration and animal registration should be in place. Also, point II.1.8 of the same certificate stipulates that only meat from animals covered by residue monitoring plans submitted in accordance with Council Directive 96/23/EC and in particular, Article 29 is eligible for export to the EU.

Point 9.1 of the simplified health certificate for fresh pig meat in Annex II to Commission Decision 2005/290/EC requires the OV to certify that the fresh meat complies with the relevant Canadian public health standards and requirements, which have been recognised as equivalent to the EU standards and requirements.

**Findings**

*5.5.1 Holding registration, animal identification and movement controls*

54. A PID number is allocated to all pigs holdings (see paragraph 21).

55. For porcine animals a national database (PigTRACE) is managed by the Canadian Pork Council (CPC). Alberta has its own provincially regulated traceability system, administered by Alberta Pork, and its Alberta's Swine Movement database feeds information to PigTRACE so that a single national system is achieved.

56. All movements of live animals are recorded in the database by means of a double notification, made by the holdings of departure and of destination.

57. As an alternative to reporting movements, producers can register to "link" farm premises that have regular movements between one another at least three times a month (this must be proven with six months of prior movement reporting): such producers must report movement details on a monthly basis, in order to keep the "linked" status.

58. Unlike breeding boars and sows (identified by an ear-tag), fattening pigs do not need to be identified. A slap tattoo on the shoulder is applied the day before pigs are sent to the slaughterhouse, bearing an identification code of the holding. An additional tattoo is applied at slaughterhouse level by FBO staff having screened animals requiring special *ante-mortem* inspection by the VIC for animal health or welfare reasons.

59. The double movement notification means that, even if not identified, pig movements are easily traceable in the database, and the number of animals easily identified.

*5.5.1 Hormone-free programme*

60. Annex T of the MHMOP (Canadian Ractopamine-Free Pork Certification Programme – CRFPCP) describes the general requirements for the production and certification of ractopamine-free pork products for export. The programme has been recently updated and is available on the CFIA webpage at: http://www.inspection.gc.ca/food/exporting-food/specific-requirements/meat/crfpcp/eng/1434119937443/1434120400252.

61. The "Canadian Pork Excellence" (CPE) programme is a national on-farm food safety assurance programme developed and delivered by the CPC. Records kept under the programme can demonstrate that, prior to enrolment under the CRFPCP, the farm has not kept pigs fed with feed containing ractopamine for at least 12 months. According to the CFIA, for market access reasons more than 95% of pigs in Canada are raised without ractopamine, even if not officially enrolled in the ractopamine-free programme.

62. There are 339 feedmills currently enrolled in the programme, of which 41 are type D facilities (only handling pre-bagged feed), 289 are type A (manufacturing only ractopamine-free feed), while 9 are type B premises (manufacturing both ractopamine-

free feed and ractopamine-added products). Particular preventive programmes to avoid carry-over of ractopamine into "free" feed are required for the latter.

63. The audit team visited one type A feedmill, manufacturing pig feed. The premises were found largely in compliance with the requirements of the ractopamine-free programme. During the visit the audit team focused on the operations of sequencing and flushing of the equipment after the production of medicated feeds (which represented ±15% of the total feed production), and found the records to be comprehensive.

64. One pig holding was visited and found largely in compliance with the ractopamine-free programme requirements.

65. Pig slaughterhouses are required to test 0.02% of carcases for residues of ractopamine; this was implemented in the two slaughterhouses visited, with satisfactory results.

*5.5.2 Official controls*

66. Official staff of the Feed Division of CFIA regularly carries out inspections in the feedmills. The audit team saw annual reports in the feedmill visited, which included assessment of flushing/sequencing operations and verification of labels.

67. After an initial screening made by the FBO, identity of pigs is verified at the time of *ante-mortem* inspection carried out by the official staff.

68. Official samples (kidney tissue) are taken by the VIC at slaughterhouse level in the framework of the National Residue Monitoring Programme and analysed in accredited private laboratories approved by CFIA. According to the CFIA only a positive result has been notified in the past years: a follow-up samples also tested positive and the holding was removed from the program as the FBO did not respond to the CFIA request for corrective actions.

**Conclusions on ractopamine-free production of pigmeat destined for export to the EU, and its controls**

69. The ractopamine-free programme for pigs intended for slaughter for export to the EU is implemented as planned and offers the guarantees listed in the health certificate. Nonetheless, the absence of individual identification of pigs when moved between holdings may affect their full traceability.

### 5.6 OFFICIAL CONTROLS AT ESTABLISHMENT LEVEL

**Legal requirements**

CETA, in particular Annex 5-E.

**Findings**

70. The CETA establishes the equivalence of Canadian legislation with regard to public health. Some additional guarantees concerning *Trichinella* absence in pig meat are specific for the export to the EU.

*5.6.1 Ante-mortem inspection*

71. According to the guidance provisions available on the CFIA website, slaughterhouse staff is entitled to carry out a pre-screening ("*ante-mortem* examination") of animals at reception: a pen card is completed with the number of animals, the pens where they would rest and a note on possible animal welfare concerns.

72. Following this initial examination, the identity is verified at the time of *ante-mortem* inspection carried out by the official staff: inspection is usually carried out by the VIC, but can also be performed by MIs under the supervision/responsibility of the VIC.

73. *Ante-mortem* examinations and inspections were properly documented in the three slaughterhouses visited. However, in one case the checks carried out by FBO staff did not immediately identify that the transfer certificate did not indicate the number of pigs sent to slaughter. The FBO stated that, as unloading of animals was still ongoing, reconciliation of the number of animals counted with the information in the transfer certificate, would be carried out once the operations were completed.

*5.6.2 Post-mortem inspection*

74. Slaughterhouse staff carries out purely technical tasks (e.g. separation and presentation of offal) to help MIs.

75. Records of *post-mortem* inspection were drawn up "by exception", meaning that only large pathological lesions leading to condemnation of the entire carcase were recorded. Offal and viscera with pathological lesions were discarded by MIs without records.

76. *Post-mortem* inspection was carried out as required, in the three slaughterhouses visited.

*5.6.3 General and specific hygiene requirements*

77. The audit team visited three slaughterhouses with attached cutting facilities, two for pigs and one for cattle.

78. Only one pig slaughterhouse could be considered overall compliant with some minor hygiene deficiencies.

79. The cattle slaughterhouse visited presented significant maintenance problems in the floor of the cutting room and in some parts of the killing floor; extensive cracks were present and the coating of the floor was damaged/absent in some parts, showing the underlying concrete basement. Some of the damage had been pointed out by the VIC in the CVS, but the extent and the seriousness of the deficiencies could not be correctly evaluated by the audit team from the examination of the official documentation, including the CAR issued and the corrective programme drafted by the FBO.

80. The third establishment visited presented serious non-compliances with regard to structural maintenance, hygiene of operations and insufficient space for all operations carried out: warm carcases were stored in the chiller together with cold carcases obtained the day before, clean and dirty crates were stored together in the same chiller with carcases, extraneous material was stored in the room where carton boxes were prepared and stored. For this establishment the audit team asked the CCA to provide written guarantees of suspension of certification for the EU and of delisting. At the final meeting, the CCA undertook to do so.

*5.6.4 HACCP-based systems*

81. All visited establishments had HACCP-based procedures implemented: zero tolerance policy for carcases contamination was applied and corrective actions were documented.

82. One establishment had its own water supply from surface water: chlorination took place through direct injection of chlorine into the pipes and monitoring of free-chlorine was continuous, showing levels consistently above 1 ppm. Microbiological testing was carried out weekly for *E.coli* and *coliforms*, but not for *enterococci* or *Clostridium perfringens*. Some tests resulted in detection of *coliforms*, but this was attributed to possible contamination of samples due to wrong sampling procedures, and no further action requested by the VIC or carried out at the FBO's own initiative.

*5.6.5 Microbiological testing*

83. In accordance with the provisions of the CETA, microbiological testing of carcases for generic *E.coli* and *Salmonella* after chilling, is carried out as described in the procedures in Annexes T and U of the former MHMOP (as per United States Department of Agriculture's performance standards). For *Salmonella* testing, 82 samples from carcases or 53 samples from ground beef must be collected during consecutive working days, and maximum five samples can be tested positive. For generic *E.coli*, one sample every 300 carcases must be collected during the year.

84. The audit team noted generally satisfactory results from FBOs' records, in the three slaughterhouses visited. However, in the cattle slaughterhouse the written procedures of the FBO did not indicate the number of samples to be taken, the frequencies of sampling, or the acceptable limits for positive results.

*5.6.6 Trichinella testing/freeze treatment*

85. In the two pig slaughterhouses visited, no *Trichinella* testing was performed on the meat intended for export to the EU. Both operators had outsourced the freezing treatment to cold stores from which also final export took place. Cold stores receive palletised vacuum packed pig meat in carton boxes. Before signing the health certificate, the VIC at the slaughterhouse receives a freezing attestation from the MI at cold store level (Annex J) together with a verification form, to support the issuing of the certificate.

86. The audit team visited one of these cold stores, which received vacuum packed pig meat in carton boxes. The processing flow included a preliminary blast freezing step to bring the temperature of meat to -18°C, before storing the meat in a chiller at -18°C for 106 hours (in accordance with the treatment authorised by the CFIA). The procedures drafted and implemented by the FBO and the records of the freezing treatment were incomplete in respect of a) the segregation of EU-eligible products in the preliminary blast freezing step, and b) the records of the time of start and end of the cold treatment (only the days were recorded, not the time); these deficiencies were immediately corrected by the FBO, by updating its procedures. The CCA could not confirm that this issue had been assessed during official controls carried out in other cold stores approved for the freezing treatment of pork intended for export to the EU.

*5.6.7 Traceability of meat and health/identification marking*

87. SFCR no longer requires the health marking of cattle and pig carcases following *post-mortem* inspection, if these carcases undergo further cutting at the same location. EU-eligible cattle carcases at the slaughterhouse visited bore a letter “E” stamped with red ink on each hind quarter, applied by FBO staff. Such carcases were visually segregated in a dedicated chiller, and were cut the following day in the first cutting shift.

88. Almost all Canadian pigs are now raised without being fed ractopamine; the two slaughterhouses visited only slaughtered ractopamine-free animals (including from holdings not specifically enrolled in the programme), which were considered all EU-eligible and thus, did not require specific segregation procedures (see paragraph 59).

89. A clear physical separation between cutting of EU-eligible carcases and conventional ones, is required. However, the audit team could not observe this physically separated cutting of EU-eligible carcases, as this activity was not performed the day of the visits.

*5.6.8 Animal welfare at the time of slaughter*

90. No animal welfare concerns were noted in the cattle slaughterhouse visited; the FBO Animal Welfare Officer maintained comprehensive records of his activities.

91. In one pig slaughterhouse, the time of exposure of animals to $CO_2$ used as stunning gas did not adhere to the FBO's procedures. Pigs were loaded manually into the gondolas, and this required some time, delaying the whole stunning system. Although the FBO stated to use a gas concentration and exposure time as per industry guidelines (78-90% for 30 seconds’), the exposure time observed by the audit team was above 2 minutes. Some animals were not stunned but dead, and bleeding did not occur with heart beats. The FBO confirmed that during routine slaughter, some carcases had to be disposed of as insufficiently bled.

*5.6.9 Documentation of official controls*

92. Official controls in Canadian approved establishments need to be documented through the CVS; additionally, "Annex M" needs to be completed in EU-listed premises.

93. Although all prescribed records documenting official controls were available in the establishments visited, the findings recorded there did not or not fully represent the actual conditions of the premises and of the operational hygiene as seen by the audit team. Most of the deficiencies noted by the audit team were neither mentioned in the CVS reports and/or in the verification worksheets, nor included in the maintenance programmes drafted by the FBOs.

94. The records documenting completion of CVS tasks as seen by the audit team were mostly verification of FBOs' procedures and records. Although verification of the status of the structures, their maintenance, operational hygiene, HACCP-based procedures, etc. is to be performed within the CVS, the records did not confirm that this had been the case, with many of the deficiencies noted by the audit team in this regard not identified and/or recorded by the official control staff.

**Conclusions on official controls at establishment level**

95. Official controls in EU-listed establishments were documented as required by the national legislation and CCA procedures. Nonetheless, controls as documented focus mainly on FBOs' procedures and records and not on other mandatory CVS verification tasks. As a result, the records do not constitute an accurate record of the actual level of compliance of the establishments but moreover, the controls are not effective in detecting the deficiencies present in the establishments and ensuring their correction, as evidenced by the non-compliances present.

96. No evidence was provided by the CCA that FBOs' procedures aimed at ensuring that pig meat intended for the EU is frozen in accordance with the established mandatory time period –and thus to support the health attestation in respect of *Trichinella* – were sufficiently specific to provide that assurance in all EU-approved cold stores.

### 5.7 OFFICIAL CERTIFICATION

**Legal requirements**

Annex 5-I of the CETA.

Article 6 of Council Directive 96/93/EC.

Article 14 of Regulation (EC) No 854/2004.

Articles 14 and 18 of Regulation (EC) No 206/2010.

**Findings**

97. No relevant changes in the certification procedures occurred since the last DG SANTE audits in 2014 and 2018. Certificates are issued in hard copies to the requesting VIC at the establishment.

98. In one establishment exporting pig meat to the EU, boxes of fresh chilled meat were sent to an EU-listed cold store to undergo a freezing treatment in accordance with CFIA specification; then the meat was loaded in a container which was sealed at the cold store itself, for export. The final certificate was signed by the VIC at the slaughterhouse/cutting plant, after receipt of a freezing attestation and request of certification countersigned by the MI at the cold store (see paragraph 83). This certificate was not bilingual but in the official language of the EU Member State of destination; the VIC stated to have the French version on file to understand the content of the export certificate. The model certificate used was the simplified version laid down in Decision 2005/290/EC.

**Conclusions on official certification**

99. Certification procedures are adequate and are applied as foreseen.

## 6 OVERALL CONCLUSIONS

The new Canadian legislation "Safe Food for Canadians Regulations" entered into force in 2019, repealing and consolidating previous national provisions, but did not significantly change the relevant requirements.

The different authorities involved in the controls are clearly designated; however, a potential conflict of interest is not adequately addressed with regard to private veterinarians, accredited with the competent authorities to evaluate the adherence of pig/cattle holdings and cattle feedlots with the requirements of both hormone-free programmes. Such veterinarians are paid by the operators subject to their controls, while also providing zootechnical and sanitary assistance to them.

The current system implemented by the competent authorities to evaluate the compliance of food establishments with the Canadian legislation and the additional EU provisions is not able to provide the guarantees that only fully compliant establishments continue to be listed for export to the EU; the system does not adequately reflect the real conditions of structure and hygiene in the federally registered establishments listed for export. Only one out of the three establishments visited by the audit team could be considered fully compliant, while for another one of the three the audit team requested written guarantees on suspension of certification for export to the EU, and de-listing. The corrective actions announced and implemented following the previous audit in 2014, and aimed at providing assurances as regards continued compliance of EU-listed establishments with the relevant requirements, have not been effective.

With regard to the pig meat sector, the situation can be assessed as globally satisfactory: in Canada more than 95% of all pigs are ractopamine-free.

By contrast, in the beef sector, most of the corrective actions announced by the CCA in its

action plan aimed at addressing recommendation No 1 of the 2014 audit report which concerned the guarantees in respect of traceability and EU-eligibility for the purposes of the hormone-free programme, have not been implemented: the two existing computerised databases are not yet fully interconnected, movements of cattle (with the exception of movements to slaughter and initial identification at the holding of birth) are not notified and no controls are performed over the use of official ear-tags delivered to the holdings.

Thus, traceability of EU-eligible cattle mainly relies on hard copies of movement documents and certificates, which were found in several cases to be incomplete, or containing erroneous information while at the same time, traceability and eligibility controls at farm level also demonstrated deficiencies.

## 7 CLOSING MEETING

A closing meeting was held on 20 September 2019 in Ottawa with the CCA. At this meeting, the preliminary findings of the audit were presented by the audit team and discussed.

The representatives of the CCAs acknowledged the findings presented by the audit team and offered some additional information. In addition, the CCA committed to cease certification for export to the EU in one establishment, and to initiate the procedure for its de-listing.

## 8 RECOMMENDATIONS

| No. | Recommendation |
|---|---|
| **1.** | As a matter of urgency, to re-assess all EU-listed food processing establishments against the Canadian legal provisions and the additional EU requirements, and to exclude from the list those establishments which are not fully compliant.<br>*Recommendation based on conclusion No 26*<br>*Associated findings Nos 22, 23, 24 and 25* |
| **2.** | To verify that measures to address/prevent low levels of performance at the level of the accredited veterinarians (AV) performing controls on primary production, are implemented in accordance with the CFIA internal rules on conduct.<br>*Recommendation based on conclusion No 18*<br>*Associated finding No 16* |
| **3.** | In order to ensure adequate traceability of cattle with a view to ensuring their EU-eligibility, to improve the performance of the cattle databases, by adding the obligation of double notification of movements (from both holdings dispatching and receiving animals), by making the notification of all movements of cattle mandatory, and by including automatic checks and alerts for incorrect data.<br>*Recommendation based on conclusions Nos 51 and 52* |

| No. | Recommendation |
|---|---|
| | *Associated findings Nos 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 43, 45, 46 and 47* |
| **4.** | To improve the (reliability of) controls by AV and DVO at the level of primary production, in order to strengthen traceability and to ensure eligibility of the animals.<br>*Recommendation based on conclusion No 53*<br>*Associated findings Nos 37 and 38* |
| **5.** | To improve identification and traceability of live pigs by applying the slap tattoo (with the identification code of their holding of birth) at the time the animals are leaving the holding of birth.<br>*Recommendation based on conclusion No 69*<br>*Associated finding No 58* |
| **6.** | To ensure that official controls in establishments comprehensively cover, and document, all mandatory CVS verification tasks, in order to ensure the timely detection of non-compliances present and their correction in EU-listed establishments.<br>*Recommendation based on conclusion No 95*<br>*Associated findings Nos 79, 80, 92-94* |
| **7.** | To verify that all EU-approved cold stores adequately document the freezing treatment of vacuum packet pig meat intended for the EU, in order to ensure that the prescribed freezing time is complied with before certifying such meat for export to the EU.<br>*Recommendation based on conclusion No 96*<br>*Associated findings Nos. 25 and 86* |

The competent authority's response to the recommendations can be found at:

http://ec.europa.eu/food/audits-analysis/rep_details_en.cfm?rep_inspection_ref=2019-6681

**ANNEX 1 – LEGAL REFERENCES**

| Legal Reference | Official Journal | Title |
|---|---|---|
| Reg. 882/2004 | OJ L 165, 30.4.2004, p. 1, Corrected and re-published in OJ L 191, 28.5.2004, p. 1 | Regulation (EC) No 882/2004 of the European Parliament and of the Council of 29 April 2004 on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules |
| Dec. 2005/290/EC | OJ L 93, 12.4.2005, p. 34–39 | 2005/290/EC: Commission Decision of 4 April 2005 on simplified certificates for the importation of bovine semen and fresh pig meat from Canada and amending Decision 2004/639/EC |
| Reg. 206/2010 | OJ L 73, 20.3.2010, p. 1–121 | Commission Regulation (EU) No 206/2010 of 12 March 2010 laying down lists of third countries, territories or parts thereof authorised for the introduction into the European Union of certain animals and fresh meat and the veterinary certification requirements |