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

Food safety Symposium in TAIWAN

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Ministry in charge of agriculture  
FRANCE

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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 27 Member States
- 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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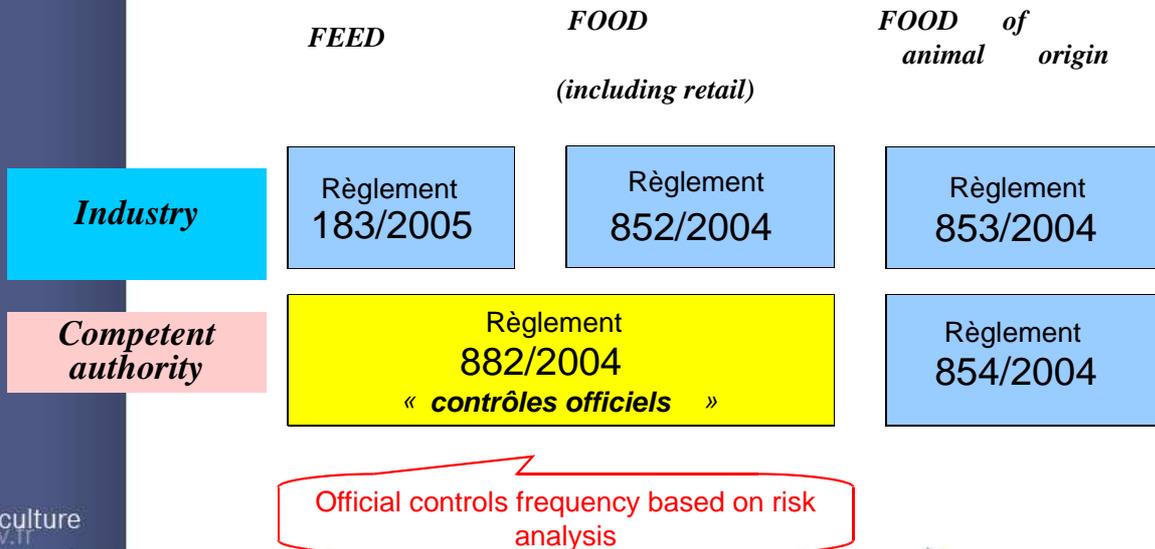
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# Architecture of Hygiene Package regulations

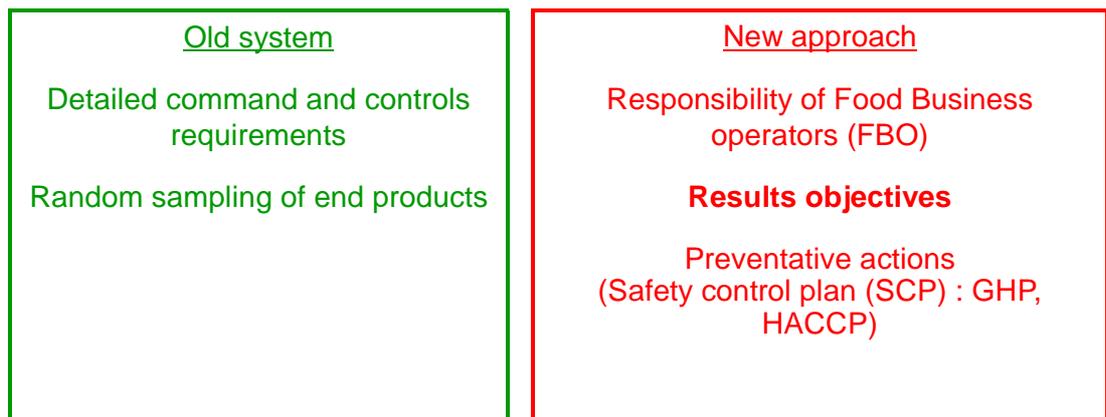
**FOOD LAW (règlement n°178/2002)**



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# Evolution of risk management principles



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

to

Food safety system based on **risk** management

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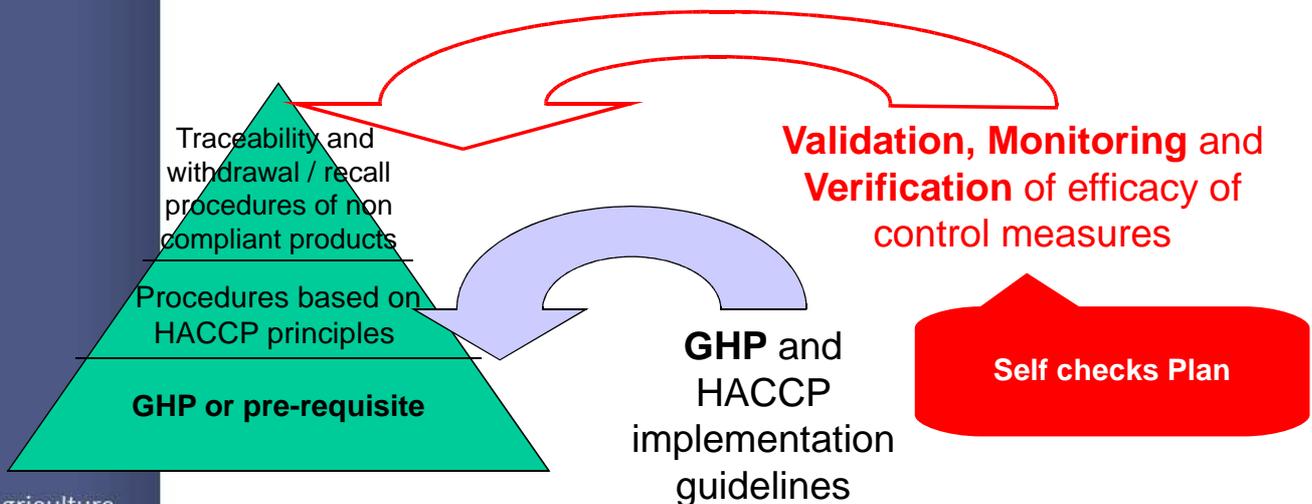
## Each FBO must prepare its own Sanitary control plan (SCP) :

- ✓ 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) :



1. **What food businesses are expected to do under EU legislation (« Hygiene package »)**
2. **Competent Authority supervision and official controls policy in France**



# Organisation

## Sanitary Policy in France

(Animal health, Plant Health and Food Safety)

**A leading Ministry**

Ministry of Agriculture, Food, Fisheries,  
Rural development and Territorial  
planning

**One competent Directorate** General Directorate for  
Food (DGAL)





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# Organisation

## The French official veterinary services *A clear administrative organization*

### 1 – Separation of functions

⇒ Scientific risk assessment / Risk management

### 2 – A risk-based approach to a comprehensive and integrated food and feed chain from farm to fork

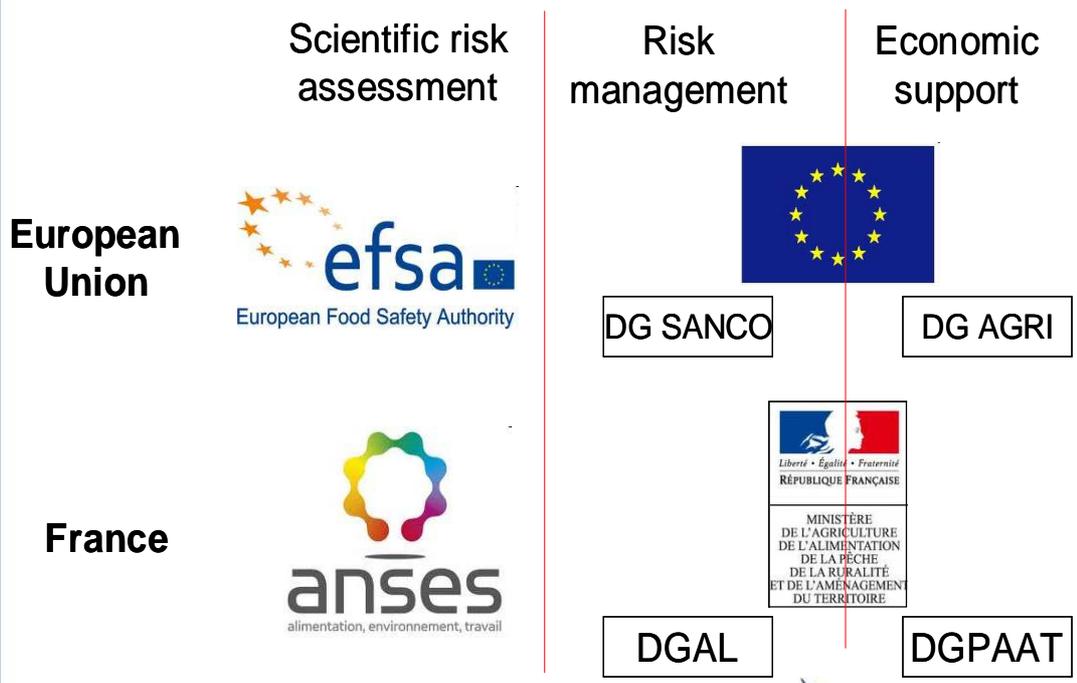
### 3 – A continuous chain of command between the central level and local level

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## The French sanitary system: separation of functions



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# Organisation

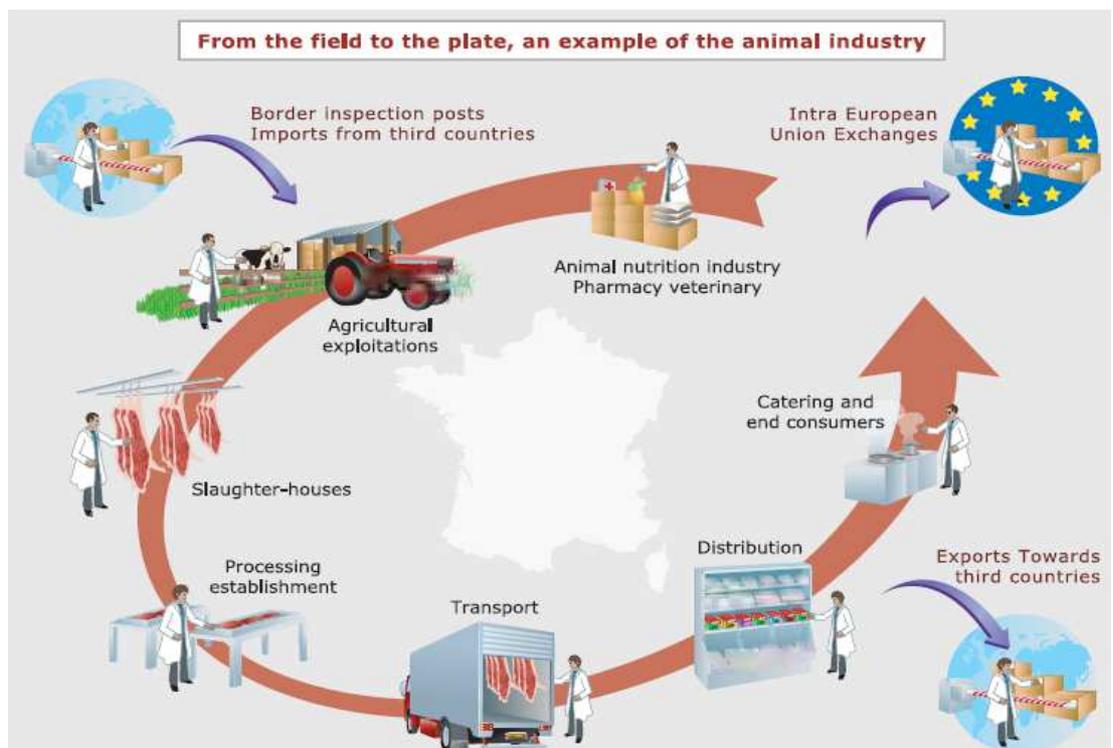
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- 1 – Separation of functions  
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- 2 – A risk-based approach to a comprehensive and integrated food and feed chain from **farm to fork**
- 3 – A continuous chain of command between the central level and local level

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# From farm to fork





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# Organisation

## The French official veterinary services *A clear administrative organization*

### 1 – Separation of functions

- ⇒ Scientific risk assessment / Risk management
- ⇒ Economic support / Health control

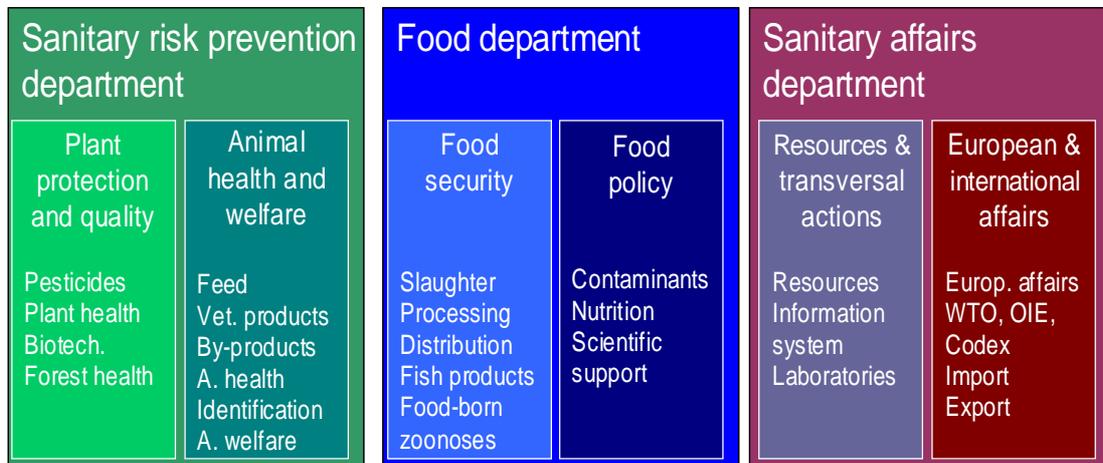
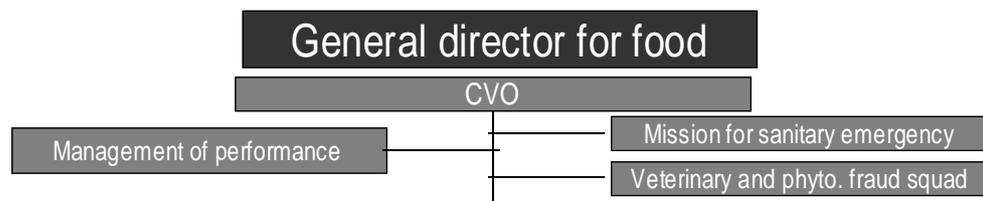
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### 3 – A continuous chain of command between the central level to the local level

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## Central level - General directorate for food (DGAL)

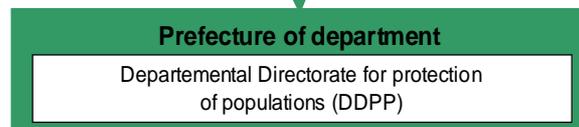
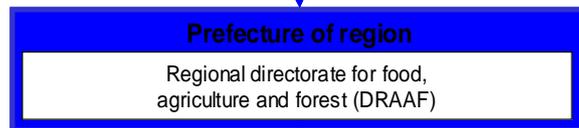
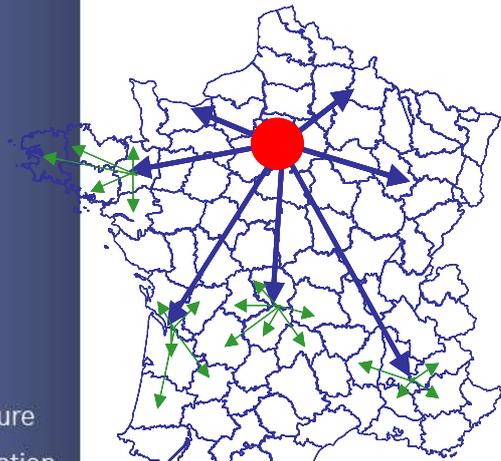


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## Link between central level and local levels

A continuous chain of command from the national level (design of policies) down to the field (implementation and enforcement of policies) via a regional level



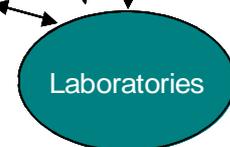
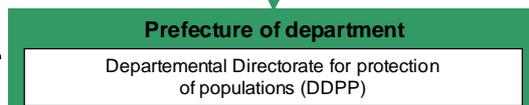
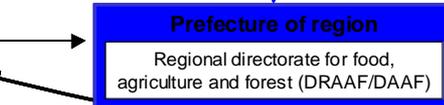
101 departments (31 with coastlines)

Staff: 5 515 civil servants including  
1 013 veterinarians and 2 640 technicians

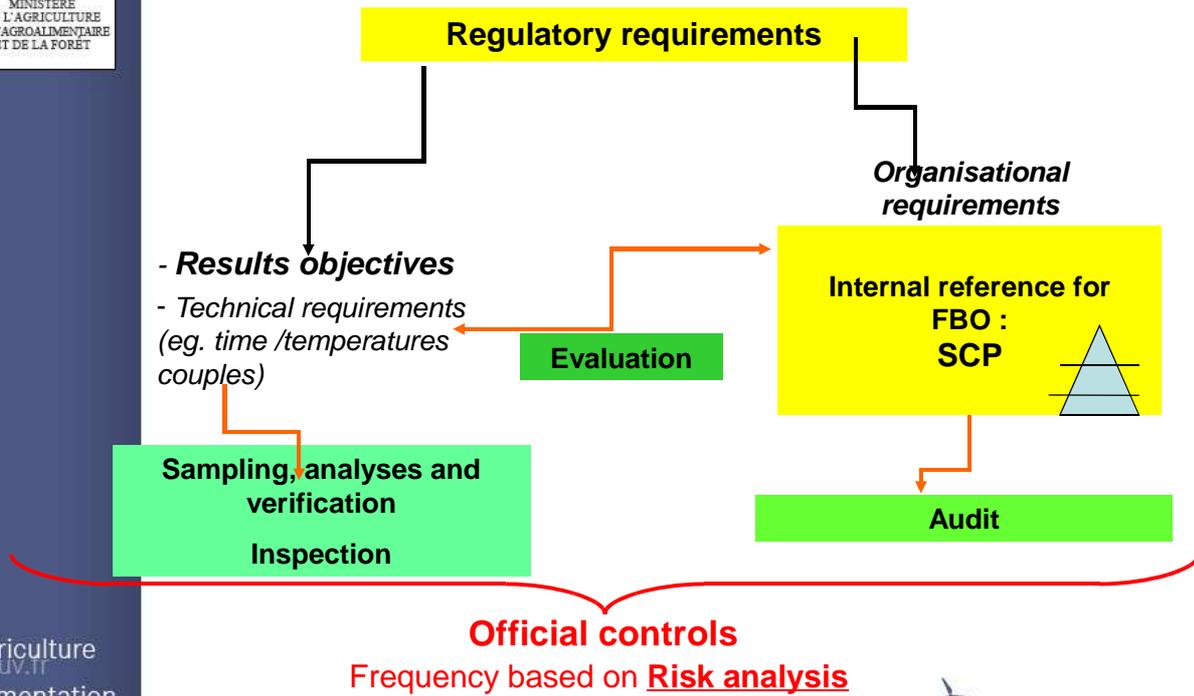
## Organisation of the chain of command for the control of animal health



European Union



# Hygiene package Regulations



# 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

## 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...

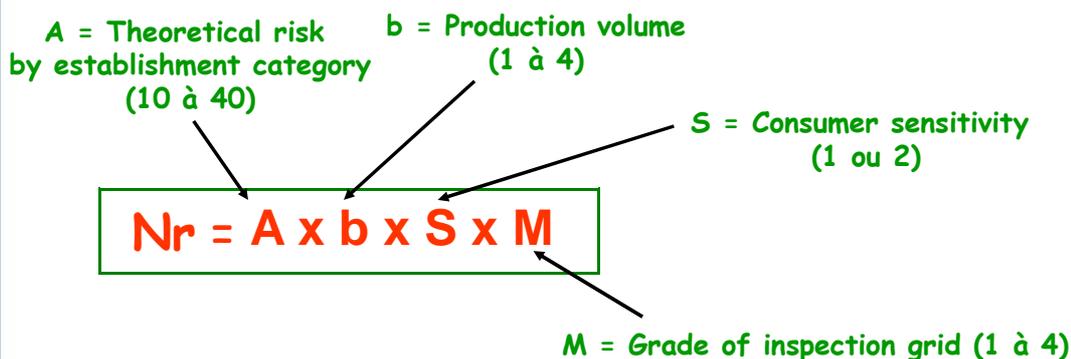
➤ **Accreditation (ISO 17020) of French Official Inspection Body (DGAL and 100 field offices) : March 2010**

-> also a requirement under ISO 17020 accreditation to have a tool to schedule inspections according to risk analysis

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## Risk classification of establishments



- 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** ( $Nr \geq 480$ ) and **category III** ( $200 \leq Nr < 480$ )

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## A level – Meat products

A=10	
A=15	- Dried meat products, shelf stable - Canned meat products, shelf stable (approved establishment)
A=20	
A=25	- Treated stomach, bladders and intestines - Gelatine (excepted produced by bones) - Canned meat products, shelf stable (farm approved establishment)
A=30	- 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	- Smoked/salted/dried meat products, not shelf stable, ready to eat - Meat products not shelf stable, ready to eat - Meat preparations
A=40	- 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



## B level – meat and meat products

### Minced meat and meat preparation (domestic ungulates) :

- Production  $\leq$  100 t/an .....b = 1
- 100 < production  $\leq$  1.000 t/an .....b = 2
- 1 000 < production  $\leq$  2 000 t/an .....b = 3
- Production > 2 000 t/an .....b = 4

### Meat products (domestic ungulates, poultry) :

- Production  $\leq$  50 t/an .....b = 1
- 50 < production  $\leq$  500 t/an .....b = 2
- 500 < production  $\leq$  5 000 t/an .....b = 3
- Production > 5 000 t/an .....b = 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** ( $480 > Nr > ou = 200$ ) – approved establishments : **1 /year** minimum
- ✓ **Risk categories I & II** ( $Nr < 200$ ) – approved establishments : **1 /3 years** minimum

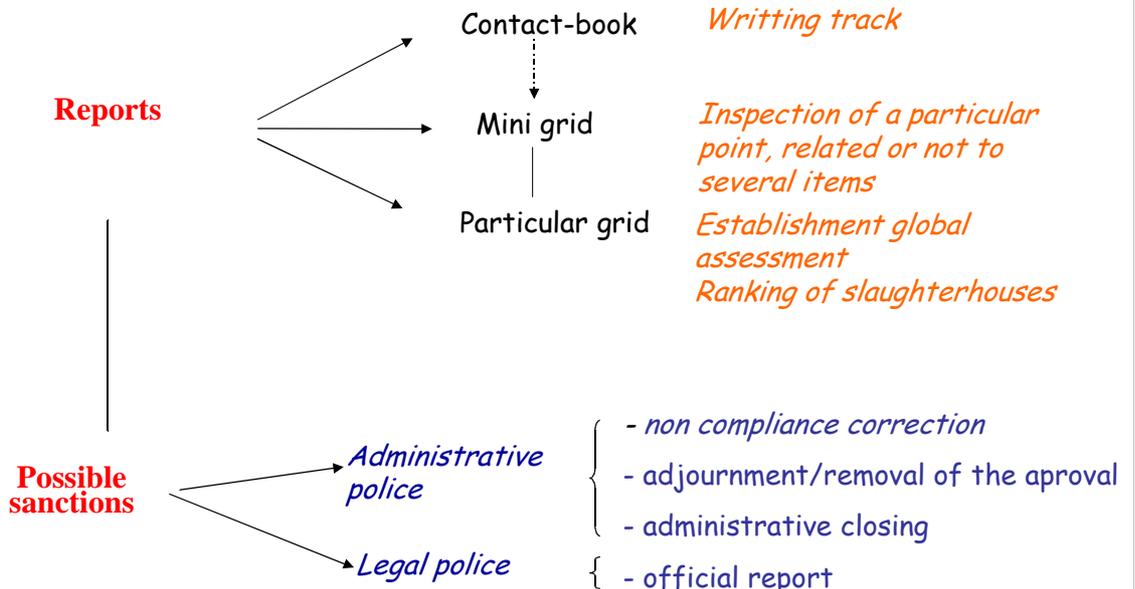


## Type and programming of the inspection in slaughterhouse

- ✓ « 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 « unavoidables »: inspection's mini-grids
- ✓ Permanent « product » inspection inseparable from « establishment » inspection: notion of inspectors' contact book



## Methods and tools of the inspection in slaughterhouses



## Food Safety Inspections : Export approval of establishments

Regulations

Approval by  
competent authority

EU Legislation

UE approval

+

+

Specific requirements  
Country Legislation

Export approval

List of approved establishments /  
export of meat products to third countries

**Thank you for your attention !**