

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

Food safety Symposium in TAIWAN

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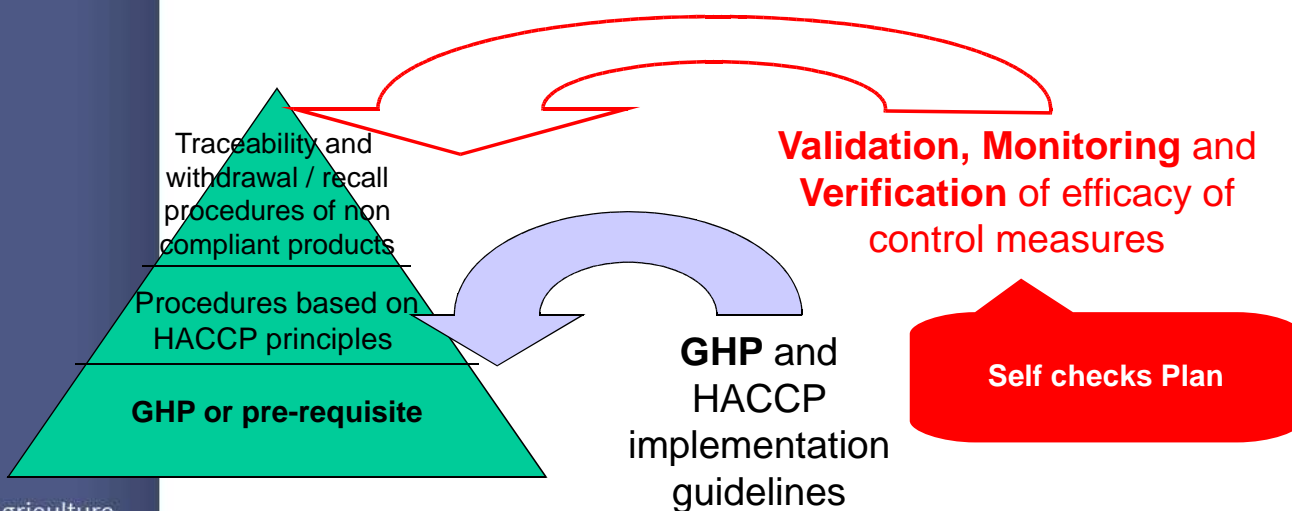
Each FBO must prepare its own Sanitary control plan (SCP) :

- ✓ 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) :



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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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

The French sanitary system: separation of functions

Scientific risk
assessment

Risk
management

Economic
support

European
Union



DG SANCO

DG AGRI

France



DGAL

DGPAAT

Organisation

The French official veterinary services *A clear administrative organization*

1 – Separation of functions

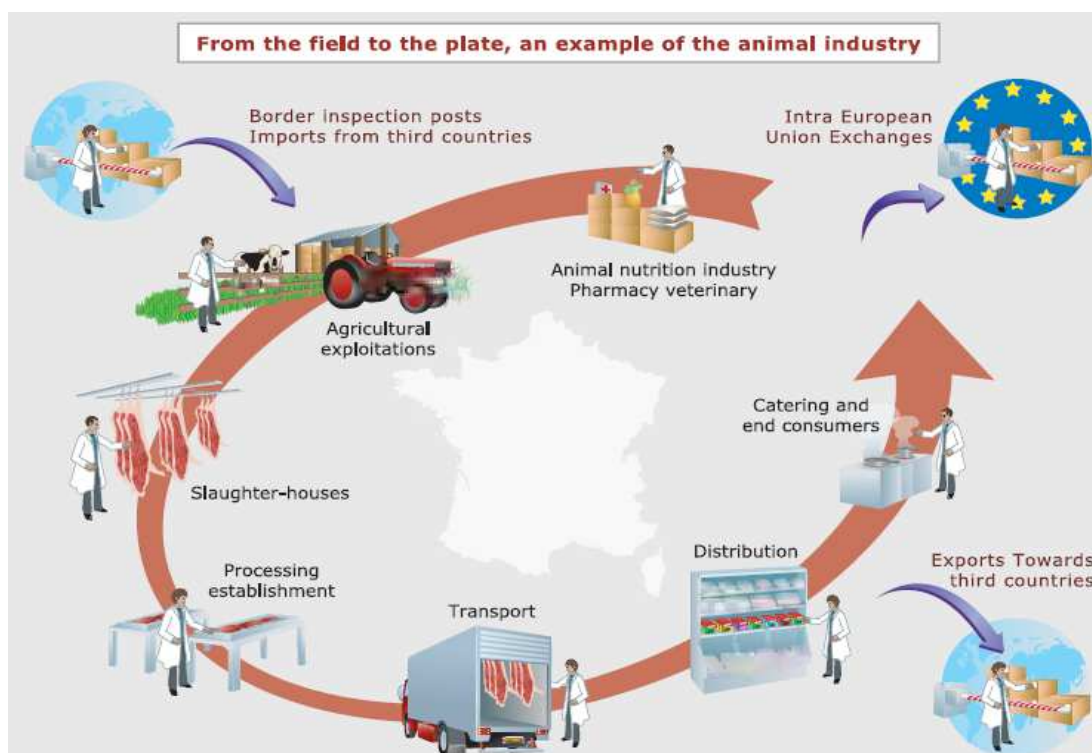
⇒ Scientific risk assessment / Risk management

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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From farm to fork



Organisation

The French official veterinary services *A clear administrative organization*

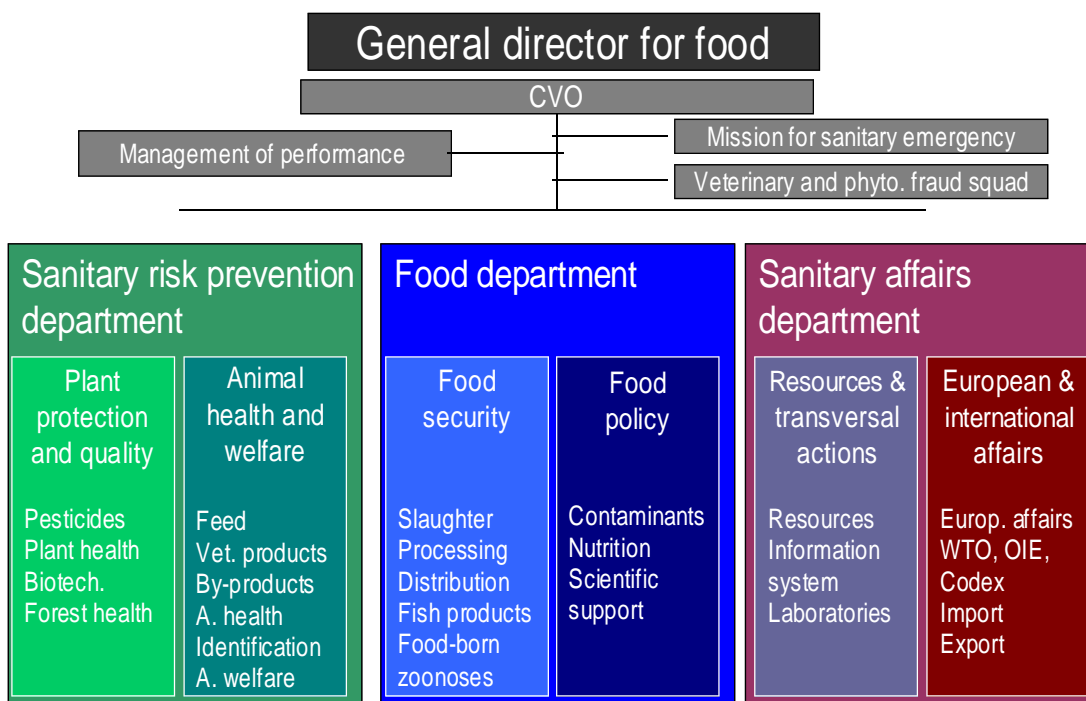
1 – Separation of functions

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

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

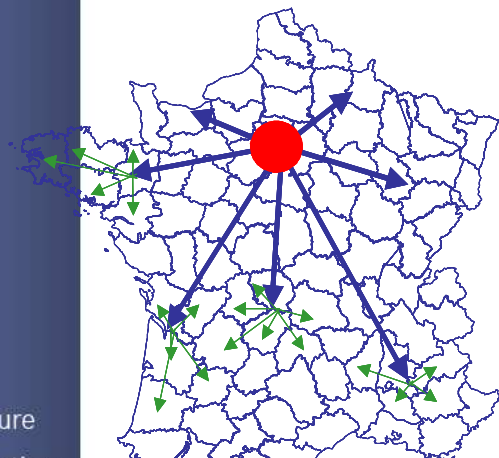
3 – A continuous chain of command between the central level to the local level

Central level - General directorate for food (DGAL)



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



Ministry for Agriculture, the Food Processing Industry and Forestry

General directorate for food

Prefecture of region

Regional directorate for food, agriculture and forest (DRAAF)

Prefecture of department

Departmental Directorate for protection of populations (DDPP)

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



Ministry for Agriculture, the Food Processing Industry and Forestry

General directorate for food

CVO

Prefecture of region

Regional directorate for food, agriculture and forest (DRAAF/DAAF)

Prefecture of department

Departmental Directorate for protection of populations (DDPP)

Breeders

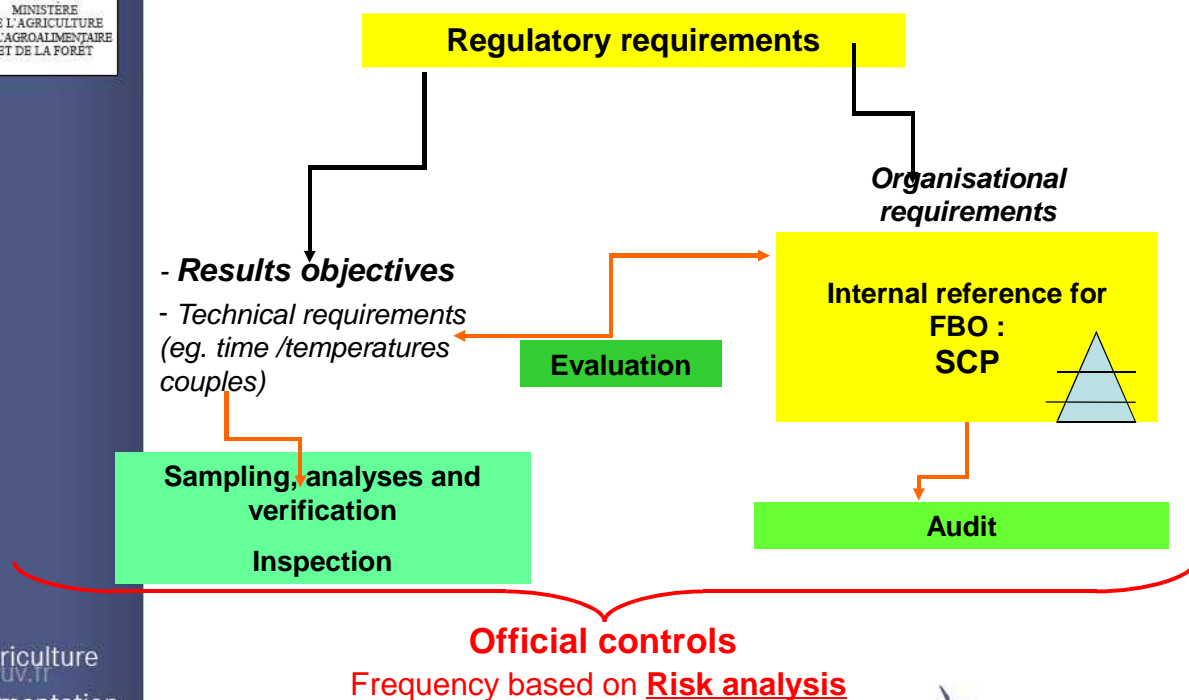
Sanitary veterinarians*

* Private veterinarians with sanitary mandate

FranceAgriMer
Professionals

Laboratories

Hygiene package Regulations



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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...

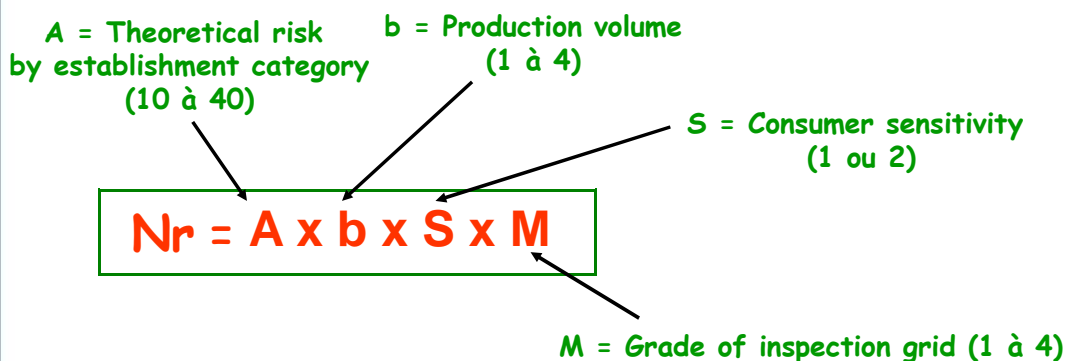
➤ **Accreditation (ISO 17020) of French Official Inspection Body (DGAL and 100 field offices) : March 2010**

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

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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** ($\text{Nr} \geq 480$) and **category III** ($200 \leq \text{Nr} < 480$)

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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 ≤ 100 t/anb = 1
- $100 < \text{production} \leq 1.000$ t/anb = 2
- $1\,000 < \text{production} \leq 2\,000$ t/anb = 3
- Production $> 2\,000$ t/anb = 4

Meat products (domestic ungulates, poultry) :

- Production ≤ 50 t/anb = 1
- $50 < \text{production} \leq 500$ t/anb = 2
- $500 < \text{production} \leq 5\,000$ 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** ($480 > Nr > 200$) – approved establishments : **1 /year** minimum
- ✓ **Risk categories I & II** ($Nr < 200$) – approved establishments : **1 /3 years** minimum

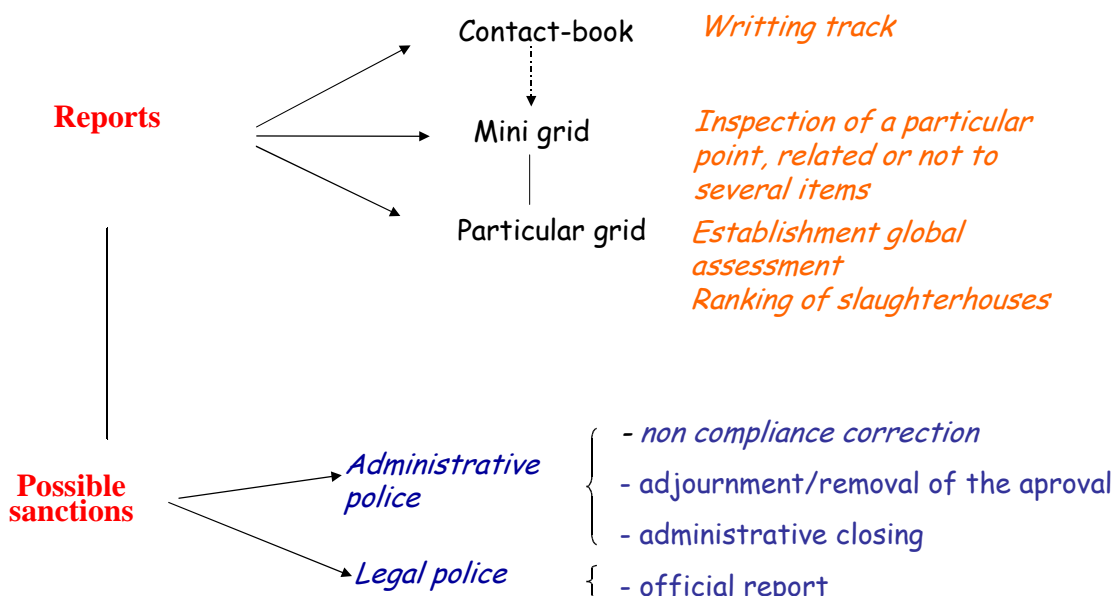


Type and programming of the inspection in slaughterhouse

- ✓ « 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



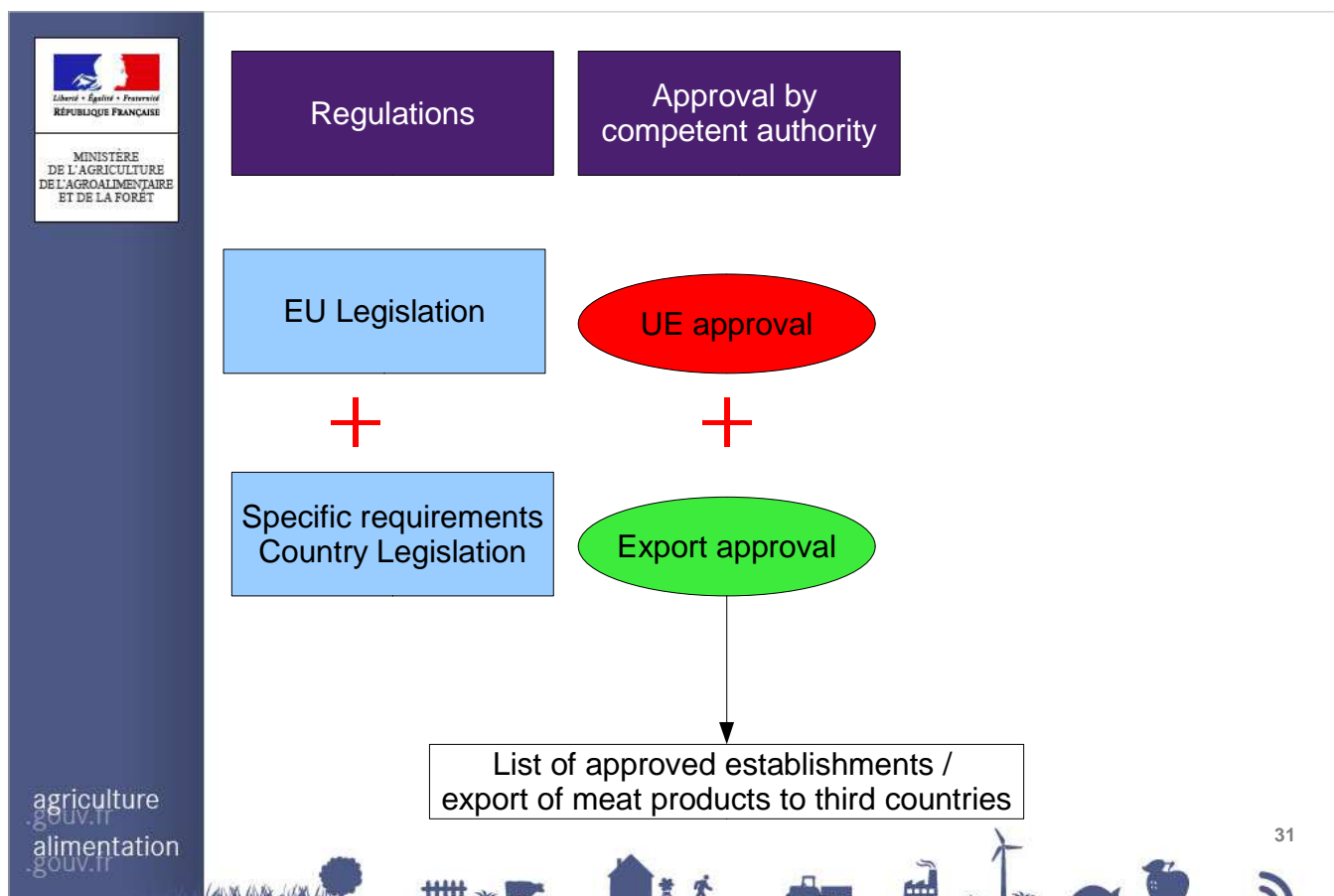
Methods and tools of the inspection in slaughterhouses



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Food Safety Inspections : Export approval of establishments

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Thank you for your attention !

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Bottom Decorative Bar: Icons representing various agricultural and food-related elements: a tree, a fence, a cow, a house, a person, a tractor, a factory, a wind turbine, a fish, an apple, and a Wi-Fi symbol.

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