

ANNEX 1

Response of the competent authorities of Canada to the recommendations of report ref. DG(SANTE)/2018-6458-MR of the audit carried out from 10 September 2018 to 24 September 2018 in order to evaluate the control systems in place governing the production of horse and game meat intended for export to the European Union

2018 Recommendation	Action Proposed by the competent authority
<p>(1) To ensure that the establishments are approved for export to the EU only if they are subject to regular review to assess their compliance with all the conditions for listing, as required by Chapter 18 of the MHMOP, and that the lists of establishments approved for export to the EU are kept up-to-date, fully reflecting the activities carried out and communicated to the Commission as required by Article 12.(3) of Regulation (EC) No 854/2004.</p> <p>Recommendation based on conclusion No 45 Associated finding No 43</p>	<p>CFIA has taken action regarding the two establishment's eligibility to export to the EU. Both establishments have been removed from the eligibility list to export equine meat to EU.</p> <p>An analysis of this finding has been conducted with the Areas to determine the cause and appropriate follow-up. In response, a Listserv message is being prepared to be issued to the Areas to confirm that only those establishments that meet all exporting country requirements are to be on the list of establishments eligible to export. The listserv message will be distributed by fall 2019.</p> <p>The inspectors will continue to validate that the EU requirements are being met, by performing CVS Task 3.2.01 and Annex M specific for verification of EU requirements at least once yearly. VIC's will validate that the information is being documented in the CVS database while completing CVS task 3.2.04: to verify that the establishment is meeting EU requirements.</p> <p>If required, a CAR will be issued to the operator to address the finding. If necessary, the inspector will initiate the process to delist the establishment.</p> <p>Another tool that will be used to record supervisory oversight activities conducted by the RVO is outlined in the Operational Guidance (OG-2016-0805) <i>Worksheet for Supervisory Oversight in Meat (WSOM)</i>. Using the WSOM, the supervisor (RVO) verifies that CFIA activities in each meat establishment are conducted and documented in accordance with prescribed policies and procedures. More specifically, that the establishment meets exporting country requirements.</p>
<p>(2) To develop tools for cooperation and coordination between federal and provincial authorities, to enforce existing legislation (both at federal and Provincial level) in case horses are brought to slaughterhouses when withdrawal periods after administering VMPs have not elapsed, or in the event of prohibited</p>	<p>In 2016, the CFIA conducted consultations with provincial authorities, stakeholders and internally. The outcome of the consultations resulted in the strengthening of the equine program based on existing federal and provincial jurisdictions and industry responsibilities.</p> <p>As a follow-up, a document called <i>Operational Guidance OG-2016-0099 Supplementary Equine Information Task</i> was developed to facilitate consistent procedural implementation by inspection staff for the review of these documents at the</p>

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<p>substances being discovered.</p> <p>Recommendation based on conclusion No 38 Associated findings Nos 4, 19, 20, 79 and 80</p>	<p>facilities.</p> <p>Under the SFCR, operators of a federal equine slaughtering facility are required to develop, implement and maintain a control program within their Preventive Control Plan (PCP) that ensures the validity and accuracy of information contained on the EID that accompanies the animal being slaughtered in the facility. The Operators are required to screen the EID and the horse(s) prior to slaughter to determine acceptability.</p> <p>The CFIA may assess the effectiveness of the operator’s control over the validity of the EID at the auction market, equine buying agent, and lot program feedlot level by the use of the Supplementary Equine Information Tasks. If an unsatisfactory verification result is identified on the Supplementary Equine Information Tasks, the CFIA Veterinarian at the federal equine slaughter facility is notified.</p> <p>As a means of overseeing industry compliance, CFIA inspectors conduct equine sampling under the National Chemical Residue Program (NCRMP). There were 344 horses tested in the 2017-2018 sampling year under the monitoring program. Various tissues were sampled from these horses and each animal was tested for roughly 100 different residues. This amounted to nearly 37,000 individual results on these samples and 6 violations found resulting in a compliance rate of over 99%. The CFIA inspector follows up on out-of-compliance results as required, and report in the national Residue and Antimicrobial System Guide (RAMS).</p>
<p>(3) To develop a reliable system to ensure that documentation (EIDs) accompanying horses to slaughter is reliable and correctly records the VMP status of the relevant animal, and to ensure that follow-up of non-compliances (residues) has an equivalent effect to the requirements of Articles 16-19, 22 and 23 of Council Directive 96/23/EC.</p> <p>Recommendation based on conclusions No 99,100, and 122</p>	<p>CFIA is of the view that a reliable system is in place for EID’s accompanying horses to slaughter to be reliable and correctly record the VMP status of the animal.</p> <p>More specifically, the operator of an equine slaughter facility must have effective control programs and procedures to ensure the validity of the claim made on the EIDs they accept. Operators are required to ensure that equine owners and buying agents follow procedures outlined in Chapter 17 of the MHMOP and that they provide an accurate EID to the slaughter operator. There are provisions in this chapter that industry must follow when incomplete information and unacceptable documentation is provided to operators for equine that arrive at their slaughter establishment.</p> <p>The inspectors verify the validity of the EID for horse slaughtered at federally registered establishments by completing CVS</p>

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<p>Associated findings Nos 72, 74, 77, 83, 109, and 110</p>	<p>Task 1.2.37 – Ante-mortem Document Review (Slaughter Equine) at least once per quarter.</p> <p>In 2017-18, the NCRMP testing of various equine tissues resulted in a compliance rate of over 99%. The NCRMP is part of the Agency’s Integrated Risk Management priority. It is a statistically designed sampling and testing program intended to provide information on chemical residues and contaminants in the food supply. If the residue(s) pose an unacceptable health risk to consumers, the CFIA will initiate enforcement actions. Any such actions would also be communicated with foreign competent authorities if it is determined that the implicated product was exported.</p> <p>As part of CFIA’s on-going efforts for continuous improvement regarding the delivery of the equine program, the following listserv and/or e-mails messages were distributed nationally to serve as a reminder of the equine inspection activity requirements:</p> <p>October 2018, an e-mail from National Inspection Division Director (NID) regarding Operational Guidance (OG-2016-0099) Supplementary Equine Information Tasks (RDIMS 7615873) and CFIA’s requirement to deliver on this inspection activity.</p> <p>February 2019 - a listserv message to inform that the relevant documents for the equine program have been updated under SFCR and available to be used. The message included a reminder that inspectors are required to review Chapter 17 Annex E of the Meat Hygiene Manual of Procedures (MOP) prior to completing the Equine Document Oversight Assessment course on the Canada School of Public Service website.</p> <p>February, 2019 an e-mail from NID Director to reconfirm the CFIA’s requirement to deliver on the equine inspection activities under the SFCR.</p>
<p>(4) To ensure that, in accordance with Canadian federal and provincial legislation, accurate and reliable medical records are kept at game farms level, to adequately support the declaration of the owner in the documents accompanying the animals to slaughter.</p>	<p>The local CFIA staff verify that Annex D.1 is has been completed and signed. To make sure the elks intended for export to EU are not coming from a herd where CWD has been confirmed or officially suspected, the CFIA checks on an internal document for CWD case number tracking sheet (RDIMS #2668495 or “O-Drive” O:\APHD\AHD\DisCtrl\DiseaseInvestigations\2018\CWD_MDC).</p>

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<i>2018 Recommendation</i>	<i>Action Proposed by the competent authority</i>
Recommendation based on conclusion No 65 Associated finding No 56	