National plan for the achievement of full compliance with EU requirements related to meat safety and supervision of the traceability of pork in Poland

General Veterinary Inspectorate
Poland

Marcin Kozlowski

Beijing, 28-29 March, 2012

Situation in Polish meat sector before accession

In the 1990s the number of the establishments in the meat sector spontaneously increased due to liberal policy of Polish government. The majority of them were small, primitive and did not fulfill some elementary structural and hygienic requirements. In the end of 1999 the number of establishments in meat sector exceeded 4,130:
- over 2,790 establishments slaughtered animals,
- over 2,770 establishments cut meat,
- over 2,650 establishments processed meat.

According to the publication of the Main Statistic Office only 870 establishments employed over 5 people, including 350 large and medium sized establishments employed over 50 people.

It meant dispersion of slaughter capacity and lack of efficient veterinary supervision and control.
<table>
<thead>
<tr>
<th>Kind of activity</th>
<th>2004</th>
<th>2009</th>
<th>2012</th>
</tr>
</thead>
<tbody>
<tr>
<td>Slaughter (red meat)</td>
<td>1563</td>
<td>1137</td>
<td>851*</td>
</tr>
<tr>
<td>Cutting (red meat)</td>
<td>1915</td>
<td>1446</td>
<td>1212*</td>
</tr>
<tr>
<td>Processing (red meat)</td>
<td>1878</td>
<td>1341</td>
<td>1029*</td>
</tr>
<tr>
<td>Slaughter (poultry meat)</td>
<td>277</td>
<td>234</td>
<td>200*</td>
</tr>
<tr>
<td>Cutting (poultry meat)</td>
<td>306</td>
<td>353</td>
<td>531*</td>
</tr>
<tr>
<td>Processing (poultry meat)</td>
<td>86</td>
<td>139</td>
<td>567</td>
</tr>
</tbody>
</table>

* The difference in falling numbers of establishments stems from the fact that establishments were classified before 1 January 2006 for the production to the national market in accordance with the derogation contained in Article 4 of Commission Regulation (EC) No 2076/2005. These entities were entitled to produce food of animal origin to the domestic market. They were granted a 4-year transitional period, which expired on 31 December 2009.

<table>
<thead>
<tr>
<th>Year</th>
<th>Number of establishments</th>
</tr>
</thead>
<tbody>
<tr>
<td>1999</td>
<td>4,130 in total</td>
</tr>
<tr>
<td>2008</td>
<td>2,559 in total</td>
</tr>
</tbody>
</table>

2008

<table>
<thead>
<tr>
<th>2008 Number of establishments</th>
</tr>
</thead>
<tbody>
<tr>
<td>1,385 approved for EC trade</td>
</tr>
<tr>
<td>1,174 registered for national market</td>
</tr>
</tbody>
</table>
At the beginning of the accession negotiations, after the examination and analysis of the EU law in scope of the veterinary field, we realized that the process of adjustment meat sector covers several aspects and requires:

- quite complex approach,
- involvement and good cooperation between different services, agencies and ministers,
- co-financing from the public funds,
- time – it means transitional period for some establishments.

Animals
- Registered holdings
- Herd health status (zoonosis BSE, TBC, Bruc.)
- Identified
- Clean – reduction FC
- Accompanied by FCh!

Slaughterhouse premises
- Layout, design, construction, size, ventilation, light
- Adequate maintained
- Proper production flow
- Floor, wall, ceilings surface
- …

Equipment
- Clean, disinfected in good order,
- Well maintained
- Materials allowed to be in contact with food

Traceability
- Documentation
- Labeling

Cold chain
- Limitation growth of microorganisms

Laboratory examination
- BSE,
- Microbiological contamination (Salmonella, Enterobact.)
- Residue of VMP

Animal by-products
- Removal,
- Segregation,
- Marking (SRMs)
- Safe disposal

Procedures
- Based on HACCP principles

Staff
- Healthy
- Trained
- Personal hygiene-protective cloth
- Hygienic behavior
- Working station organization

Quality of water
- Microbiological
- Chemical

Safe meat production
Pre-accession steps

In the pre-accession period VS performed the following operations:
- drew up the register of the establishments in the meat sector,
- determined capacity and other data of the establishments,
- assessed each establishment in terms of the possibility to adjust to EU requirements,
- classified each establishment into one of the appropriate categories:
  - category A – establishments which were in line with EU food law,
  - category B 1 – establishments which had the possibility to comply with EU food law before accession,
  - category B 2 – establishments which needed the transitional period after accession,
  - category C – establishments which had to finish activity

Adjusting period in the B2 establishments concerned exclusively deficiencies in structural (technical) aspects, not hygienic ones.

GVI drew up so called „check lists” used for uniform and standardized assessment of the establishments carrying out the same activity.

Starting point for the establishment of B category was detailed inspection of the establishment, performed by DVO by means of a relevant check list, in order to estimate the scope of modernization and adjusting works.

Secondly, basing on deficiencies written down in the check list, the FBO had to define in the special schedule appropriate deadlines for addressing each deficiency.

Schedules were sent by the DVOs to the RVOs. The RVOs, after verification and giving an opinion on those schedules, sent them (in electronic form) to the Chief Veterinary Officer.
Transitional period conditions

- **Poland requested for a transition period for:**
  - 260 red meat establishments,
  - 53 poultry meat establishments,
  - 7 cold stores
  linked with the deadlines for correcting existing shortcomings contained in the individual schedules, which expired at the end of December 2007.

- **Poland had to implement measures and control system to guarantee other MS that meat from the establishments in transition will not enter the EU internal market.**

- **Moreover, meat originating from an establishment subject to a transitional period couldn’t enter another establishment which was not subject to transitional measures**

- **All products from integrated meat establishments were regarded as subject to transitional measures if any part of the establishment was subject to a transition period.**

The number of FBOs have decided to move all production or some part of the production from the old premises to the entirely new buildings, due to:

- lack of adequate space, to extend the existing buildings,
- higher costs of the modernization than investments in new buildings.
Pursuant to Polish national provisions FBOs intending to carry out the activity related to production of products of animal origin, before obtaining the authorization for construction of the establishment, are obliged to prepare the technological design of the establishment and send it with the application for approval to the District Veterinary Officer.

Technological design, shall consist of:

1) descriptive part:
   including inter alia specification of the type of activity, capacity, number of staff, detailed description of production processes, list of rooms in the plant, list of production equipment, devices, installations and tools, specification of required physical parameters in the plant rooms, where it is necessary, description of cleaning, disinfection, decontamination and pest control methods etc…;

2) graphic part.

Graphic part of technological design, including permanent plans shall present:

a) management of plant grounds with its surroundings, facilities on the plant grounds, especially entrance and exit gateways, storehouses, waste and wastewater tanks, places of collecting or storing waste, washing stations for means of transport,

b) a plan of the rooms, including technological roads and internal transport from the raw material to product consignment, with the specification of plant zones with various microbiological pollution levels,

c) places, where individual production stages take place, workstations, equipment, installation and production device localization, from the raw material acceptance to product consignment,

d) road system:
   – transfer of production employees to and from their workstations,
   – delivery of raw materials, permitted additional substances, and packages,
   – removing used packages, waste and wastewater,

e) water supply installation system, divided into cold, hot and mixed water distribution, with numbered water abstraction points or the place where water was provided for the plant, as well as the water supply system – in case of using water not intended for human consumption, for firefighting and technical purposes,

f) places, where protection against pests are placed,

g) required physical parameters in rooms, including temperature, frequency of air exchange, light intensity in rooms
Results of adjustment process – establishments which have granted transitional period based on Accession Treaty

<table>
<thead>
<tr>
<th>Establishments</th>
<th>Totally Ceased Activity</th>
<th>Establishments</th>
</tr>
</thead>
<tbody>
<tr>
<td>260 red meat</td>
<td>81</td>
<td>260 red meat</td>
</tr>
<tr>
<td>establishments</td>
<td>activity</td>
<td>establishments</td>
</tr>
<tr>
<td>53 poultry meat</td>
<td>20</td>
<td>53 poultry meat</td>
</tr>
<tr>
<td>establishments</td>
<td>activity</td>
<td>establishments</td>
</tr>
<tr>
<td>7 cold stores</td>
<td>4</td>
<td>7 cold stores</td>
</tr>
<tr>
<td></td>
<td>activity</td>
<td></td>
</tr>
</tbody>
</table>

Supervision over the traceability of pork in Poland

Supervision over the traceability of pork in Poland is regulated by the Instruction of the CVO of Poland on conducting the official controls on the traceability of products of animal origin and marking.

Instruction is issued under the (Polish) Act of 29 January 2004 on Veterinary Inspection.
LAW AND RELATED DOCUMENTS EU:


4) Regulation of the European Parliament and Council No 882/2004 of 29 April 2004 on official controls performed to verify compliance with feed and food law, animal health and animal welfare rules (Official Journal. EU No L 191 30.4.2004, p 200-251);

The regulation (EC) no 178/2002 lays down the requirements on food traceability.

„Traceability”, pursuant to the art. 3 item 15 of this regulation, means the ability to trace food, feed, a breeding animal or substance intended to be or expected to be added to food or feed throughout all stages of production, processing and distribution.

The art. 18 of the regulation obligates food business operators to:
- be able to identify a supplier of any foodstuff, breeding animal or substance intended to be or expected to be added to food;
- be able to identify a consumer of any foodstuff,
- possess systems and procedures enabling disclosure of this type of information on demand of a competent authority.
Checks

During the inspection of food businesses over the traceability of animal movements / food, pay attention to these issues:

1) Possession of a system that allows direct identification of the supplier(s) of animals, raw materials, subproducts, products, permitted additives or slaughter animals for the production, as well as the possibility of establishing a connection "provider-animal" or "supplier-raw material" (i.e., determine which animals or raw materials, intermediates, etc. come from the suppliers). Possession of information concerning separate supplies, which includes the following:
   a) your name / business name and address of the supplier;
   b) the date of the transaction (shipping / delivery);
   c) type of product / species of animals;
   d) the amount and labeling of products (if applicable) / number and identification of animals (if applicable);
   e) the batch number (if applicable);
   f) date of production / date of minimum durability / shelf life (if applicable).

The information contained in the documents should be legible and complete. The system should enable the efficient identification of individual suppliers.
Checks

2) Possession of a system for identifying the direct recipient(s) of individual animals or products, as well as the possibility of establishing a connection "client-animal", "customer-product" (i.e., determining which animals or semi-finished products, etc. which have been delivered to customers).

Possession of the information on separate shipments, which includes the following:

a) your name / business name and address of the recipient;

b) the date of the transaction (shipping / delivery);

c) type of product / species of animals;

d) the amount and labeling of products (if applicable) / number and identification of animals (if applicable);

e) the batch number (if applicable);

f) date of production / date of minimum durability / shelf life (if applicable).

The information contained in the documents should be legible and complete. The system should enable the efficient identification of individual recipients. When carrying out checks, please note that the information collected will depend on the type of activities carried out by the food business operator – e.g., in the case of dairy labeling data will not be required, batch number and shelf life for the separate supplies of raw milk. Hence, using the above statements, the required data should be adjusted to the type and scope of the FBO’s activity.

Checks

3) The accuracy of the information contained on packaging or labels to the actual content of the packaging, including packaging and transportation. It should be verified if the plant does not use wrappings / packagings with the labels and labeling of other plants or labels of its own, but containing outdated / inadequate information. In particular, note the labeling of reusable plastic containers.

4) Ensuring by a company under the "internal tracking" traceability allowing determination of the membership of raw materials, subproducts and finished products to the specific lots on the stages of the preparation, processing and storage taking place in the production process.
Checks

5) The correspondence of the information contained on products, packaging or labeling with the data contained in documents maintained the system at various stages of production and, which accompany with the shipment.

6) Compliance documentation accompanying consignments of animals / animal products or other products intended to be added to food with the specific requirements of separate regulations. The documents should be legible, properly issued, and include complete data (eg date of issue, the next number of the document, sign companies, sign the party, type of heat treatment - if required, etc.).

7) Possession of systems and procedures for identifying companies from which materials or articles intended for contact with food have been delivered.

Each time facts should be checked against the documentation.

For this purpose, the official veterinarian shall:

a) In the case of the slaughterhouse, choose a random animal / animals from the livestock store from to verify:  
   - Possibility to establish a connection between the animal / animals and the document accompanying the consignment (passport, health certificate, information on the food chain, the packing livestock, etc.)
   - Consistency of marking animals with the data contained in the documents accompanying the consignment, if this requirement applies (passport, certificate of health, livestock delivery specification),
   - Possibility to establish the required data of the supplier;
b) in the case of other plants (cutting, processing, cold storage, wholesale, repackaging plants) randomly select any products from the warehouse of raw materials and verify:

- Compliance of information and markings contained on the products, packaging, labels or hangers to the actual content of these packages,

- Possibility to establish a connection between the product and the accompanying document delivery, and compliance of information and markings contained on products, packaging, labels or hangers with the data contained in the delivery documents (certificates, HDI, invoices),

- Compliance of information and markings contained in the products, packaging, labels and hangers to the information documents / databases, operating within the internal tracking systems company

- Possibility to establish the required data of the supplier;

c) in the case of all establishments to check the possibility of establishing data of the recipient / recipients selected batch of products manufactured at the plant.

Administrative penalties:
If the inspection reveals non-compliance by the food business operator of the traceability requirements, or in case of shortcomings in their implementation, the district veterinarian issues an administrative decision pursuant to Article 54 of Regulation (EC) No 882/2004, depending on the gravity of the infringement.

Criminal penalties:
Regardless of the administrative decisions issued for the failure to identify the suppliers or recipients of food, contrary to the obligation referred to in art. 18 of Regulation (EC) No 178/2002, a fine may be imposed in accordance with Article 100 Paragraph 1 point 7 of the Act of 25 August 2006 on food safety and nutrition.
CHECKS FOR LABELING AND SANCTIONS

Verification of compliance with the provisions of Annex II, Section I of Regulation (EC) No 853/2004 and certain provisions of Annex I, Section I of Chapter II of Regulation (EC) No 854/2004 by food businesses operators producing, processing or distributing food products of animal origin in the the scope of the requirements concerning the labeling.

Checks

**During the inspection, it needs to be checked**

1) whether the identification mark is applied before the product of animal origin leaves the plant, when the establishment is subject to approval;
2) whether the identification mark is legible and indelible, it is clearly visible and the font is easy to decipher;
3) whether the graphic form of identification marks and signs included in the sign are correct (the plant may not apply an identification mark with the veterinary approval number that belongs to another plant);
4) whether, when applying the identification mark directly to the product, the dyes used have been approved in accordance with the regulations on food additives;

5) whether, in the case of bulk packages containing cut meat or offal, the identification mark has been applied in a way that it is destroyed every time you open the packaging. When applying multiple labels to the packages with the identification mark, check if after extracting meat or offal all labels affixed to the packaging and containing an identification mark will be destroyed;
During the inspection, check (continued)

6) or, in the case of exceptions provided for by the provisions on the application of an identification mark in the form of "seals" the application of this derogation will guarantee no possibility of manipulation, i.e. substitution of the goods, further filling up of the package, or re-use of containers bearing a label with an undamaged identification mark, by companies not authorized to do so.

LABELING

Administrative penalties

If the inspection reveals no compliance by the food business operators with the requirements on labeling or in the event of deficiencies in their implementation, the district veterinary officer issues an administrative decision pursuant to Article 54 of Regulation (EC) No 882/2004, depending on the gravity of the infringement.

Fines

Regardless of administrative decisions, for failing to properly label products of animal origin or misconduct in the implementation of these obligations, the district veterinary officer imposes fines according to § 1, point 13 - 18 and 28 of the Ordinance of the Minister of Agriculture and Rural Development of 19 December 2006 on the amount of fines for violations of animal products according to the type irregularities.
Thank you for your attention

General Veterinary Inspectorate
Food Safety Office
Marcin Kozłowski
Director

marcin.kozlowski@wetgiw.gov.pl
+48 22 623 26 53