Brussels, 12 September 2017
Case No: 80116
Document No: 873155

# Final report

# EFTA Surveillance Authority's Mission to Iceland

# regarding feed safety from 8 to 17 May 2017

Please note that comments from Iceland to factual errors in the draft report are referred to in foot notes in this final report. All comments and information on the corrective actions taken or planned by Iceland are included in Annex 3 to this document.

***Executive Summary***

*This report describes the outcome of a mission carried out by the EFTA Surveillance Authority in Iceland from 8 to 17 May 2017. The objective of the mission was to verify that official controls related to feed hygiene were carried out in compliance with the European Economic Area (EEA) legislation.*

*The competent authority responsible for the organisation of official controls on feed has been designated. The competent authority has established a system for official controls based on documented procedures ensuring appropriate frequencies of controls.*

*However, the mission team noted that the implementation of official controls did not always reflect a number of the feed specific risks.*

*The mission team found some shortcomings related to the implementation of operators own controls. In particular, dryers of feed materials did not have procedures in place to ensure the level of dioxins for their products was below the set limit of the relevant EEA legislation.*

*Official controls did not ensure that the relevant requirements concerning cross-contamination and homogeneity are fully complied by operators manufacturing compound feed. In particular, the official controls do not fully assess whether measures put in place by the feed business operator to minimise cross-contamination are sufficient to comply with the maximum levels of residues of coccidiostats in feed for non-target species.*

*Another important finding was that manufacturers of fish meal, fish oil and compound feed did not monitor the level of dioxins in their products as required in Annex II of Regulation (EU) No 183/2005. Some operators did not carry out any monitoring of dioxins for their products while others did not sample their products in accordance with the frequencies set in Regulation (EC) No 183/2005.*

*In addition, at the time of the mission the mission team found a consignment in one of the feed mills visited originating from an operator in Iceland with uncertain approval status. Furthermore, traders for fish oil and fish meal had not been registered as feed business operators.*

*The report includes a number of recommendations addressed to the Icelandic competent authority aimed at rectifying the identified shortcomings and enhancing the control system in place.*

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## 1 Introduction

The mission took place in Iceland from 8 to 17 May 2017. The mission team comprised two inspectors from the EFTA Surveillance Authority (the Authority) and an observer from DG Health and Food Safety of the European Commission.

The opening meeting was held with representatives of the Ministry of Industry and Innovation (MoII) and the Icelandic Food and Veterinary Authority (MAST) on 8 May at MAST's head office in Selfoss. At the meeting, the mission team confirmed the objectives and the itinerary of the mission and the Icelandic representatives provided additional information to that set out in their reply to the Authority's pre-mission document (hereafter, 'pre-mission document').

Throughout the mission, a representative of the MAST head office accompanied the mission team. In addition, one representative of the local health authority in Reykjavík participated during one meeting.

A final meeting was held at MAST's office in Reykjavík on 17 May 2017, at which, the mission team presented its main findings and some preliminary conclusions from the mission.

The abbreviations used in the report are listed in Annex 1.

## 2 Scope and Objective of the mission

The scope of the mission was to assess the application by the Icelandic competent authorities of:

a) Regulation (EC) No 183/2005 of the European Parliament and of the Council of 12 January 2005 laying down requirements for feed hygiene;

b) Regulation (EC) No 1831/2003 of the European Parliament and of the Council of 22 September 2003 on additives for use in animal nutrition;

c) 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

This assessment was carried out based on, and related to, the further legislation referred to in Annex 2 to this document.

The main objective of the mission was to evaluate the control system in place concerning the above legislation relating to the production and use of feed for farmed animals. The mission covered all stages of the feed chain from primary production to the end use feed product.

The evaluation included the gathering of relevant information, appropriate verifications, by means of interviews and discussions, review of documents and records, and on-site visits to assess control procedures adopted and measures in place to ensure to take necessary corrective actions when necessary.

Meetings with the competent authorities and the visits to during the mission are listed in Table 1 below.

**Table 1: Competent authorities and establishments/sites visited during the mission**

| | Number | Comments |
|---|---|---|
| **Competent authorities** | 3 | An initial meeting and a final meeting between the mission team and MAST with representatives from MoII. One meeting with a District Veterinary Officer responsible for primary producers of feed materials (farms). |
| **Feed Mills** | 2 | Manufacturing compound feed for farmed terrestrial animals, including feed with coccidiostats |
| **Fishmeal fish oil plants** | 2 | Manufacturing fish meal (feed) and fish oil (feed and food). |
| **Refinery of fish oil** | 1 | Refining crude and semi refined fish oil. |
| **Dryers of feed materials** | 2 | Using a direct drying process and using diesel as fuel. |
| **Providers of surplus food** | 2 | A bakery and brewery. A representative of the Local Competent Authority was present at the visit to the bakery. |
| **Importer of premixes and additives** | 1 | Only import, storage and distribution to other feed business operators. |

## 3 Legal basis for the mission

The legal basis for the mission is:

a) Point 4 of the Introductory Part of Chapter I of Annex I to the EEA Agreement;

b) Article 1(e) of Protocol 1 to the Agreement between the EFTA States on the Establishment of a Surveillance Authority and a Court of Justice;

*c) Commission Decision 98/139/EC of 4 February 1998 laying down certain detailed rules concerning on-the-spot checks carried out in the veterinary field by Commission experts in the Member States;*

*d) Article 45 of 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.*

Relevant legislation for this mission is listed in Annex 2.

## 4 Background - Previous missions

A previous mission on feed hygiene was carried out in January 2011. The report from that mission included a number of conclusions and recommendations addressed to the Icelandic competent authority aimed at rectifying shortcomings identified. The competent authorities subsequently notified the Authority of corrective measures taken or planned to

be taken. The final report from this mission can be found on the Authority's website (www.eftasurv.int).

# 5 Findings and conclusions

## 5.1 Legislative and implementing measures

Legal Requirements

Article 7 of the EEA Agreement states that acts referred to or contained in the Annexes to the Agreement are binding on the Contracting Parties and shall be, or be made, part of the Icelandic internal legal order.

Findings

MAST provided in the reply to the pre-mission document a list of laws, regulations and administrative provisions implementing most of the EEA legislation included in Annex 2 to this report, with the exception of Regulation (EC) No 1069/2009 laying down health rules as regards animal by-products and derived products not intended for human consumption and Regulation (EU) No 142/2011 implementing Regulation (EC) No 1069/2009.

Conclusions

The EEA legislation relevant to the production, use and placing on the market of feed and feed materials has been made part of the Icelandic legal order in line with Article 7 of the EEA Agreement, with the exception of Regulation (EC) No 1069/2009 and Regulation (EU) No 142/2011.

## 5.2 Competent authorities

### *5.2.1 Designation, responsibilities and cooperation*

Article 4 of Regulation (EC) No 882/2004 requires Member States to designate the competent authorities responsible for the official controls set out in the Regulation. It also lays down operational criteria for the competent authorities.

Articles 4(3) and 4(5) of Regulation (EC) No 882/2004 require that when more than one competent authority, or more than one unit within a competent authority, is competent to carry out official controls, efficient and effective coordination and cooperation shall be ensured between the different competent authorities or units as relevant.

Findings

The organisation and responsibilities for controls of feed business operators are described in chapter 2.4 of the country profile for Iceland available on the Authority webpage. (www.eftasurv.int)

In summary: MAST, under the auspices of MoII, is the central competent authority responsible for official controls on feed. The main responsibility lies within MAST's

Office of Animal Health and Welfare. Establishments producing fishmeal and fish oil which have been granted approval for both food and feed production are, however, mostly inspected by staff from MAST's Office of Food Safety and Consumer Affairs[1].

A formal cooperation agreement between MAST and the Directorate of Customs in Iceland ('Customs Directorate') was established in 2011 which stipulates the role of the Customs Directorate in carrying out customs related enforcement of feed and feed materials on a national scale and in cooperating with other national authorities and institutions dealing with imports. According to representatives of MAST, all importers of feed materials (including pre-mixtures and additives) must be registered at MAST and must notify MAST of all imports of such materials. Customs can only permit entry of such consignments if the receiver is listed as a feed operator.

The Icelandic Medicines Agency (IMA) is responsible for authorising feed mills the manufacture of medicated feed and the import of medicated feed. At the time of the mission no production of medicated feed was taking place.

Local Competent Authorities (LCA) in Iceland are responsible for official controls of establishments placing surplus food on the market as feed materials. LCA official controls are based on a handbook issued by MAST to such establishments. The handbook covers materials intended to be used as feed and instructs the inspectors to check in particular methods of collection, storage and distribution of such material. Further, an LCA inspector met by the mission team explained that MAST had instructed the LCA to inform MAST of any establishments under their controls dealing with feed or feed material.

Conclusions

The competent authorities responsible for the organisation of official controls on feed have been designated in line with the requirements of Article 4(1) of Regulation (EC) No 882/2004.

Measures to ensure cooperation and coordination between the different levels of competent authorities and between MAST units involved in the official controls of production and use of feed are in place, as required by Article 4(3) of Regulation (EC) No 882/2004.

### *5.2.2 Registration and approval of feed business establishments*

Legal Requirements

Article 9 of Regulation (EC) No 183/2005 requires feed business operators to notify the competent authority of any establishments under their control, active in any of the stages of production, processing, storage, transport or distribution of feed, in the form required by the competent authority with a view to registration, and to provide the competent authority with up-to-date information on any establishments under their control. The competent authority shall maintain a register or registers of establishments.

[1] This statement might be based on some misunderstanding. As has been described before, it is based on the type of main production of establishments with both food and feed production which office within MAST is responsible for the inspections. There is good cooperation between these units and under certain circumstances (e.g. temporary lack of staff) inspectors from either office might help out in different districts if needed.

Article 4(2) of Regulation (EC) No 853/2004 provides that establishments handling products of animal origin for which Annex III of that regulation lays down requirements shall not operate unless they are approved. Article 31 of Regulation 882/2004 requires competent authorities to establish procedures for granting approvals. It provides that the competent authority may grant conditional approval under certain conditions. It also requires the competent authority to draw up and keep up-to-date a list of approved establishments.

Article 24 of Regulation (EC) No 1069/2009 states that operators shall ensure that establishments or plants under their control are approved by the competent authority, where such establishments or plants carry out certain activities, including processing and handling of animal by-products as specified in Regulation (EU) 142/2011. Article 44 of Regulation (EC) No 1069/2009 establishes the procedure for granting approvals and provides that the competent authority may grant conditional approval under certain conditions.

Findings

According to MAST's reply to the pre mission document, their quality manual establishes the procedures as laid down in the relevant EEA legislation for the approval of feed and food business operators. Further, the criteria for initial approval of establishments are described in the inspection handbook for inspectors. Approval of establishments requires an on-site visit, and conditional approvals (valid for three months) may be granted. Full approval can be granted once the competent authority has been ensured that all requirements (including record keeping) have been fulfilled. An online application form for food business operators has been established and can be found on MAST's homepage (www.mast.is).

In an establishment producing fishmeal and fish oil, the mission team noted that a trader dispatching products (fish oil intended for feed) to other European countries was not registered under the feed hygiene requirements. This was also noted by the representatives of MAST that were present in the establishment. During the visit, the trader acknowledged he was not aware of his obligations as a feed business operator. It was also acknowledged by MAST representatives at the same meeting that this kind of feed operators were generally not registered in Iceland.

The mission team noted that several operators had been granted approvals for the production of both fish oil for human consumption (under the Hygiene regulations) and fish oil and fish meal for animal feed (under the Animal by product (ABP) Regulation). In order to maintain such approvals, MAST requires that the operators receive only raw material fit for human consumption. In addition MAST requires operators who are producing food and feed on the same production line to separate in time between food and feed and to flush the system for one hour before changing production. However, the mission team observed that some of the operators did not respect this requirement.

In a feed mill manufacturing compound feed for farmed animals, the mission team noted that the operator was receiving fish oil from an establishment with unclear approval status. The competent authority noted that they were not certain that the establishment delivering the fish oil was approved for such activities (production of fish meal and fish oil). An investigation of the documented case together with the responsible inspectors revealed the situation to be as follows: a conditional approval was first granted under the ABP

legislation and expired. Later the operator applied for food approval for the same production. MAST rejected the application, based on a previous decision of the Ministry for Industry and Innovation concluding that viscera (guts) and other by-products from fish are not fit for human consumption.

At the time of the mission, the operator mentioned above was still included in the list of approved establishments authorised to put on the market crude fish oil intended for human consumption.

Conclusions

Compliance with Article 9 of Regulation (EC) No 183/2005 could not be ensured since not all operators (traders) active in the feed sector are registered.

Compliance with Article 31 of Regulation (EC) No 882/2004 was not fully ensured, since an establishment on the list of approved food establishments did not have a corresponding approval.

The question of the approvals granted both for the production of both fish oil for human consumption (under the Hygiene regulations) and fish oil and fish meal for animal feed (under the ABP Regulation) will be further examined separately from this report.

### *5.2.3 Organisation and planning of official controls*

Legal Requirements

Article 3 of Regulation (EC) No 882/2004 requires that official controls are carried out regularly, on a risk basis and with appropriate frequency. Controls shall be carried out at any of the stages of the production and processing chain.

Article 8(1) of Regulation (EC) No 882/2004 requires that the competent authorities carry out official controls in accordance with documented procedures, containing information and instructions for staff performing official controls.

Article 9 of Regulation (EC) No 882/2004 requires that the competent authority draws up reports on the official controls carried out, including a description of the purpose of official controls, the methods applied, the results obtained and any action to be taken by the feed business operator concerned.

Findings

According to information provided by the Icelandic competent authority in its reply to the pre-mission document of the Authority, all written procedures used in relation to official controls are explained in the MAST quality manual.

Inspections of feed business operators are carried out according to an inspection handbook established for official controls of feed processing establishments falling within the scope of Regulation (EC) No 183/2005. The current version was published in March 2012 and has not been revised since then.

The mission team noted that official controls are carried out in accordance with documented procedures laid down in MAST quality manual. Operators within the feed

sector are allocated inspection hours per year in accordance with a risk and performance assessment scheme. The risk assessment takes into account: the raw material, the nature of the processes, the volume of production and the end user. Official controls covered the feed chain from primary production to feed mills. Inspections are carried out regularly, respecting the frequencies established in MAST procedures.

The handbook covers all feed business operators and contains comprehensive instructions in many areas: detailed and complete instructions for HACCP, minimum traceability requirements and recall procedures in case of undesirable substances. The handbook also includes a table listing microbiological agents and chemical substances that need to be reported to MAST, including Salmonella and dioxins.

The mission team noted the following weaknesses related to instructions of the handbook given to inspectors:

- It is rather general and not specific to different types of business activity.
- It does not specify how to verify operators' procedures to prevent cross contamination/carry over of coccidiostats into feed for non-target animals.
- It is dated September 2012 and had not been updated to reflect more recent legislation such as Regulation (EC) No 225/2012 amending Regulation (EC) No 183/2005 (requirements for dioxin monitoring). Some older legislation (such as Directive 2002/32) is also not referenced.
- It contains no details on suspension and withdrawal of approval, or the conditions needed to maintain an approval.

Shortcomings regarding the implementation of official controls in the feed sector may be related to a lack of sufficient instructions (see chapter 5.3).

Primary producers (such as dairy farmers) registered in accordance with Annex I of Regulation (EC) No 183/2005 are regularly inspected by the relevant District Veterinary Officer (DVO) in accordance with planned arrangements. Written instructions for the DVOs are available in an inspection handbook for primary producers published in 2016. The handbook includes a section on feed, making reference only to Annex I and III of Regulation (EC) No 183/2005 and focusing on hygiene requirements such as pest control, cleanliness, storage and traceability of feed and feed materials.

On a meeting with one of the DVOs, it was acknowledged by the DVO and other representatives of MAST that during their official controls to farmers the focus is mainly on hygienic conditions and animal health and welfare. The DVO explained that feed was only subject to controls as an underlying factor when other problems occurred at the farms.

To support the inspection handbooks procedures, a database (Ísleyfur) has been established. The database includes important information such as: list of approved establishments, reports, inspection history, inspection hours, non-compliances etc.

In relation to reporting procedures, the mission team noted:

- all inspections were carried out using the handbook and the database;
- inspection points are indicated in the cover page of the report and in the inspections' overview generated by Ísleyfur;

- inspection reports were generated by the database and emailed to the operators. Copies of the reports were available in the establishments and could be accessed online by the inspectors;
- the reports indicate what was checked, describe findings, identify areas of non-compliances and reflect the follow up of non-compliance identified in previous inspections.

The mission team noted that reports identifying non-compliances and requesting corrective actions were drawn up using the Ísleyfur database and promptly submitted electronically to relevant feed business operators. Non-compliances detected and documented in the reports were in general promptly followed up on by the inspectors. However the official controls failed to identify number of shortcomings mostly related to implementation of own controls and risk management of feed business operators (see chapter 5.3).

Conclusions

Official controls are carried out regularly and the inspection frequency is in general in accordance with planned arrangements. However, compliance with Article 3 of Regulation (EC) No 882/2004 could not be fully ensured, as official controls did not include certain specific risks arising from the activities of different feed business operators.

It was not fully ensured that official controls are carried out in accordance with documented procedures as required by Article 8(1) of Regulation (EC) No 882/2004, since there are no detailed instructions in specific areas such as dioxin monitoring and cross contamination with coccidiostats or other undesirable substances. (see also chapter 5.3)

Official controls' reporting procedures are in place as required in Article 9 of Regulation (EC) No 882/2004.

### *5.2.4 Resources and training of staff*

Legal Requirements

Article 4(2) of Regulation (EC) No 882/2004 requires the competent authority to ensure that they have access to a sufficient number of suitably qualified and experienced staff.

Article 6 of the said Regulation requires the competent authorities to ensure that staff receive appropriate training, and are kept up-to-date in their competencies.

Findings

According to the reply to the pre-mission document, staff training at MAST takes place in three different ways:

- Firstly, there is an initial basic training for all new staff members organised by the human resource manager in cooperation with the staff administrator. This training covers the general procedures in MAST such as the quality manual, legal framework for MAST, IT-systems etc.
- Further training is then provided suited to the specific tasks of each staff member and is organised by the human resource manager in cooperation with the

responsible director. According to the training agenda, this covers feed and animal by-product legislation and inspections of feed establishments.

- Finally, staff participate in feed related training courses under the umbrella of the Better Training for Safer Food initiative organised by the European Commission. The annual meeting of the Nordic/Baltic cooperation was also identified as an important venue for training.

MAST is currently developing a system to assess and improve their procedures for professional training of their staff. Training needs are discussed at annual staff meetings between individual staff members and their relevant director. It was confirmed by MAST that there was no harmonised approach for the assessment of training needs for individual new or existing staff, and that the process depended on the supervisor.

The mission team noted that training was provided and inspectors met during on-the-spot visits were in general experienced and knowledgeable about feed requirements. Nevertheless staff did not systematically check certain elements specific to feed (in particular dioxin monitoring and cross contamination) during official controls.

Conclusions

There are several mechanisms in place and effort is made to meet the requirements for training of the staff of MAST. However, it is not ensured that the staff are sufficiently trained or instructed as required by Articles 4(2) and 6 of Regulation (EC) No 882/2004.

### *5.2.5 Verification procedures for official controls*

Legal Requirements

Article 4 (2)(a) of Regulation (EC) No 882/2004 requires that the competent authority ensures the effectiveness and appropriateness of official controls on feed and food at all stages of production, processing and distribution, and on the use of feed.

Article 4(6) of Regulation (EC) No 882/2004 requires competent authorities to carry out internal audits, or have external audits carried out and to take appropriate measures in the light of the results to ensure that they are achieving the objectives of Regulation (EC) 882/2004.

Findings

According to information provided by the Icelandic competent authority in its reply to the pre-mission document of the Authority, an internal audit system covering MAST and the LCAs has recently been developed. It is based on the requirements of Decision 2006/677/EC setting out the guidelines and laying down criteria for the conduct of audits under Regulation (EC) No 882/2004 and on the ISO 19011:2002 standard (Guidelines for quality and/or environmental management systems auditing).

A five-year internal audit program has been prepared to cover all areas of Regulation (EC) 882/2004 and all responsible authorities, i.e., MAST, LCAs, laboratories and the MoII. An annual risk-based audit plan had also been confirmed according to which an audit of the feed sector (covering registration of feed materials) was planned for June 2017 but has now been postponed.

The mission team noted, however, that no internal audits of official controls of the feed sector have been carried out under any of these initiatives. It was noted that internal supervisory procedures had failed to identify that inspectors had a tendency to perform inspections focusing on cleanliness of establishments rather than other risk areas related to raw materials in use and how operators own control systems are implemented.

Conclusions

An internal audit system has been developed with a view to ensure coverage of all relevant areas of activity and all relevant competent authorities within the sectors covered by Regulation (EC) No 882/2004. However at the time of the mission no such audits had been carried out in the feed sector, as required in Article 4(6) in (EC) Regulation No 882/2004.

### *5.2.6 Sampling and laboratory analysis*

Legal Requirements

Article 12 of Regulation (EC) No 882/2004 requires the competent authority to designate laboratories that may carry out analysis of samples taken during official controls and lays down mandatory accreditation and operation criteria for laboratories so designated.

Article 33 of the Regulation requires competent authorities to designate national reference laboratories and it further specifies the responsibilities of these laboratories.

Findings

According to information provided by MAST in its reply to the pre-mission document of the Authority, the competent authority has designated a laboratory in Germany that can undertake a range of analyses of samples concerning feed products, in their own laboratories or contract laboratories.

A laboratory in Iceland is used for analyses of Salmonella. It is accredited for analysis of most common substances and microorganisms in accordance with the IST EN ISO/IEC 17025 standard. The laboratory analyses Salmonella by methods: NMKL Nr. 71, 5. edition 1999 and Vidas Salmonella 30702.

According to the Icelandic country profile published in 2017 the MoII has designated Matís as national reference laboratory for Salmonella and Listeria Monocytogenes. During the mission the MoII informed the mission team that the same laboratory had also been designated as a national reference laboratory for: residues of pesticides in cereals and feeding stuffs, heavy metals in feed and food and dioxins and PCBs in feed and food; and animal proteins in feeding stuffs. However, no national reference laboratory has yet been designated for additives for use in animal nutrition.

Conclusions

The competent authority has designated laboratories that may carry out the analysis of samples taken during official controls in line with Article 12 of Regulation (EC) No 882/2004.

National Reference Laboratories responsible for most of the parameters (except for additives for use in animal nutrition) related to official controls of feed have been designated as required by Article 33 of Regulation (EC) No 882/2004. Since none of these laboratories were visited during the mission, no further assessment in relation to their compliance were made.

## 5.3 Implementation of official controls

### *5.3.1 Risk management, sourcing and traceability*

Legal requirements

Article 5(2) of Regulation (EC) No 183/2005 provides that the requirements set out in its Annex II shall be met for feed business operations other than those regarding primary production and associated operations. This includes traceability requirements

Article 5(6) of Regulation (EC) No 183/2005 establishes that feed business operators and farmers shall only source and use feed from establishments which are approved or registered in accordance with this Regulation.

Article 6 of Regulation (EC) No 183/2005 requires feed business operators to put in place, implement and maintain, a permanent written procedure or procedures based on the HACCP principles.

Article 7 of the same Regulation requires feed business operators to provide the competent authority with evidence of their compliance with Article 6 and to ensure that any documents describing the procedures developed in accordance with Article 6 are up-to-date at all times.

Regulation (EC) No 853/2004 states in its Annex III, Section VIII, Chapter IV, Point B that raw materials used in fish oil for human consumption derive from fishery products which are fit for human consumption and are handled throughout the food chain as such. It also states that a food business operator may produce and store both fish oil for human consumption and fish oil and fish meal not intended for human consumption in the same establishment provided that the raw materials and the production process comply with the requirements applying to fish oil intended for human consumption.

Findings

The mission team noted that generally feed business operators' checks on incoming raw materials tended to be more focused on quality than safety concerns and that accompanying documentation did not always give sufficient guarantees for safety of the material or identify its intended use. However the operators in general had list of suppliers in place and clear instructions to the staff at the reception to only accept the incoming material from listed establishments. The lists drawn up at the establishments corresponded mostly with the official list drawn up by MAST.

In general, the operators maintained records on incoming materials and their place of origin as well as records of outgoing finished products and the place of their destination. Not all operators visited had documented traceability procedures in place. However, the operators were able to trace the ingredient used in the production and the delivery destination of the finished product.

In an establishment using cod liver, the raw material was not labelled with the mandatory information allowing for traceability of the products. According to the relevant operator, the staff at the reception had full overview of the origin of incoming raw material and this was established by sequencing the boxes in which the raw material was stored.

Three operators producing fish meal and fish oil were visited, two of which received whole fish directly from vessels and trimmings from a nearby fish processing plant as raw materials. The third operator was using only cod liver supplied by establishments approved under the food hygiene legislation. All three operators had been granted approvals for both feed (under the ABP legislation) and food production (under the food hygiene legislation), their activities including production of both crude fish oil for human consumption (intended to be further refined by another operator in Iceland) and fish meal and crude fish oil for animal feed.

The mission team noted that the operators did not have documented procedures in place to guarantee that the trimmings used in the production were handled in accordance with requirements for fishery products laid down in Regulation (EC) No 853/2004. It was explained to the mission team that trimmings were collected from cutting machines in the fish processing plants. However, there was no evidence available that the cold chain was maintained nor any information on how the raw material was handled before entering the fish meal/fish oil plants. One of the operators acknowledged that sometimes they used material not fit for human consumption.

In relation to HACCP based procedures, the mission team noted that most of the visited establishments had their own control systems in place based on the HACCP principles. However, shortcomings were identified concerning the implementation of such procedures. A feed mill manufacturing compound feed, including feed containing coccidiostats, had not updated the HACCP plan in accordance with changes relating to operation of a new production line not covered by the existing plan. In several other areas, the implementation of own control procedures did not reflect those described in the HACCP plan. This was particularly evident in the case of sampling of Salmonella, dioxins, heavy metals and mycotoxin. In two feed mills and one producing fish oil, the flow charts were not product specific nor was rework of materials reflected in the HACCP procedures.

The mission team made further visits to two dryers of feed materials. One was drying shell sand and selling to a feed mill which then incorporated the shell sand into compound feed for farmed terrestrial animals. The other was drying barley for use at its own holding and for supplying three or four other local farmers. Both driers were using a direct drying process and diesel oil as fuel.

The audit team noted that there were no HACCP-based procedures in place to manage the hazards arising from the direct drying process and the fuel used. There was also no documentation available on the processing parameters during drying or on any corrective actions taken in case of malfunctions or failures during the drying process. Although the competent authority was aware of the risk of dioxin carry-over from the combustion of the fuel into the feed material, they had not required the operators to monitor the level of dioxin in their products.

Conclusions

In most establishments, official controls could ensure that feed operators only source feed from registered or approved feed establishments as required by Article 5(6) of Regulation (EC) No 183/2005.

Requirements concerning traceability laid down by Article 5(2) of Regulation (EC) No 183/2005 and in its Annex II were complied with at most feed establishments.

It could not be fully ensured that establishments producing both fish oil for human consumption and fish oil/fish meal for feed receive and handle the raw materials in line with requirements of Annex III, Section VIII, Chapter IV, Point B of Regulation (EC) No 853/2004.

The official controls on risk management and HACCP based procedures could not fully ensure that the requirements of Articles 6 and 7 of Regulation (EC) No 183/2005 were met.

### *5.3.2 Cross-contamination, coccidiostats in feed for non-target animals*

Legal requirements

Article 5(2) of Regulation (EC) No 183/2005 provides that the requirements set out in its Annex II shall be met for operations other than those regarding primary production and associated operation. These requirements concern, among others, cross-contamination, homogeneity and undesirable substances.

Directive 2002/32/EC sets out maximum permitted levels of residues of coccidiostats in feed for non-target animals.

Findings

The mission team visited two feed mills manufacturing feed for poultry containing coccidiostats on the same production line as feed for other species (cattle, horses, sheep and pig). One of the operators used procedures for flushing the production line. Flushing was carried out with a complete mixer load with a combination of ingredients that are normally incorporated into formulations with coccidiostats. The flush material was collected in a silo and is incorporated in formulations with the same coccidiostats.

In both of the feed mills visited, the operators were following production sequencing procedures, meaning that feeds with coccidiostats were produced on certain days only. The batch produced immediately following the feed with coccidiostats was chosen taking account of the risk of possible cross contamination from the feed with coccidiostats. Both operators had on that basis decided to produce finisher feed for the same animal species after the feed with coccidiostats. This arrangement was according to the operators sufficient to keep the risk of cross contamination of feed for non-targeted animals at an acceptable level. They did not however consider the risk of residues in the products derived from the animals receiving the feed.

Neither of the operators had procedures in place to verify the effectiveness of the measures (flushing and sequencing) taken to minimise cross contamination of feed for non-target animals with coccidiostats. In addition, homogeneity of the finished feed was never tested in those establishments.

It was observed by the mission team that the official sampling plan as laid down by the head office was followed with regard to substances to be analysed and sampling frequency. However, it was also noted that samples taken in order to monitor cross-contamination in feed mills using coccidiostats were taken randomly from final products and were not targeted on the lot produced immediately after the coccidiostats containing feed[2].

The absence of targeted official sampling for carry over of active substances does not allow for verification of the effectiveness of the measures put in place by feed operators to minimise the carry-over of coccidiostats to limits below the maximum acceptable established in the legislation.

Conclusions

Official controls could not fully ensure that the relevant requirements laid down by Article 5(2) of Regulation (EC) No 183/2005 and in its Annex II concerning cross-contamination and homogeneity are complied with at feed establishment level. In particular, the official controls do not fully assess whether measures put in place by the feed business operator to minimise cross-contamination are sufficient to comply with the maximum levels of residues of coccidiostats in feed for non-target species set out by Directive 2002/32/EC.

### *5.3.3 Dioxin monitoring*

Article 5(2) of Regulation (EC) No 183/2005 provides that the requirements set out in its Annex II shall be met for operations other than those regarding primary production and associated operations. These requirements concern, among others, monitoring of dioxins in fats, oils or products derived thereof. More specifically, these include sampling and analysis of the relevant products in accredited laboratories for the sum of dioxins and dioxin-like PCBs, specified minimum frequency of such analyses and procedures to be followed if analyses reveal that maximum permitted levels are exceeded.

Findings

The mission team visited a number of establishments receiving fats and oils for the manufacture of fish meal and fish oil.

In two feed mills visited, dioxin monitoring was not included in the HACCP plans. Whilst some fats and oils were received with a confirmation that the dioxin levels were compliant with Directive 2002/32/EC, one operator had requested such confirmation from two Icelandic suppliers of fish oil without success. Nevertheless, neither of these consignments had been rejected due to absence of guarantees that dioxin levels in the relevant fish oil was below the maximum limits of the Directive. Available inspection reports did not include any findings related to dioxin monitoring, although in October 2016 the competent authority circulated an email to relevant operators to make them aware of the EEA applicable requirements for dioxin sampling.

Two other fish meal and fish oil producers were visited which used as raw materials whole fish (mostly blue whiting, mackerel, herring and cabling) and trimmings form a nearby

[2] For clarification it should be noted that in general the sampling is targeted on the lot produced after the coccidiostats containing feed. However, this was not the case in 2016 when, due to certain circumstances, this was not carried out.

fish processing plant. The majority of the products was for feed use, with only a small percentage of fish oil being sold to another establishment where it was refined and marketed as fish oil for human consumption. One of these producers had identified dioxin as a hazard in its HACCP system and explained that samples for dioxin analyses for fish oil intended for animal feed were taken from every consignment of fish oil above 10,000 tonnes and, if its production was lower, at least once a year. Samples were also taken from every batch (each of 130 tonnes) of fish meal. These analysis frequencies do not meet the requirements of Annex II of Regulation 183/2005. The analyses were carried out by an accredited laboratory in Europe. However, according to an analytical report reviewed by the mission team in this producer's premises, the sum of dioxins/furans and dioxin-like PCBs in a sample of fish oil was above the maximum permitted levels for feed. The operator was unaware of this and had not instructed the laboratory to inform the competent authority should the results be above the maximum levels. Neither had the relevant customer been informed. The other fish meal and fish oil producer visited had also identified dioxin a hazard in his HACCP system., However, there was no sampling plan for dioxin in place and no analytical results were available. Based on available inspection reports for these operators, the mission team noted that these findings had not been detected during inspection by the competent authority.

Finally, it was explained to the mission team that MAST only took initial samples for PCBs and with the intention to have a second (reference sample) analysed for dioxin if the level of PCBs was high.

The mission team also visited an establishment refining fish oil. A selection of different types of incoming crude oil (from different fish species or parts of fish) were sampled and analysed by the company for levels of dioxin, polychlorinated biphenyl (PCB) and other contaminants twice a year as part of a procedure for deciding the extent of refining needed (*i.e.*, the number of refining steps to be applied).

The refinery explained that the refining process was intended to remove relevant contaminants from the crude oil used as a raw material. In this regard, test results from oil samples taken at different stages of the refining process viewed by the mission team showed that after the step known as 'bleaching', the content of dioxins of crude fish oil decreased to below the maximum permitted levels for fish oil for human consumption (which are more stringent than those for feed).

The refinery was producing mainly for human consumption was also producing a small quantity of fish oil intended to be sold as semi-refined feed grade oil for horses in Iceland. For the feed grade oil, the refining process stopped after the bleaching step in order to retain some organoleptic properties in the final product.

Conclusions

The official controls did not systematically include checks on operators' obligations to monitor dioxin levels in feed or feed materials. Accordingly, it cannot be ensured that requirements regarding dioxin monitoring laid down by Annex II to Regulation (EC) No 183/2005 are fulfilled and consequently that levels of dioxins and dioxin-like PCBs in feed and feed materials placed on the market by Icelandic operators are below the maximum permitted levels.

## 6 Final meeting

A final meeting was held on 17 May in MAST office in Reykjavík with representatives from the Ministry of Industry and Innovation and MAST central office. At this meeting, the mission team presented its main findings and preliminary conclusions of the mission.

At the meeting the mission team also explained that, based on a more detailed assessment of the information received during the mission, recommendations could be included in the report. The Icelandic representatives did not have any objections to the observations made and the preliminary conclusions presented.

## 7 Recommendations

In order to facilitate the follow-up of the recommendations hereunder, Iceland should notify the Authority no later than 4 November 2017, of additional corrective actions planned or taken other than those already indicated in the reply to the draft report of the Authority. In case no additional corrective actions have been planned, the Authority should be kept continuously informed of all changes made to the already notified corrective actions and measures, including changes of the deadlines indicated for completion and also the completion of the measures included in the timetable.

Iceland has also been invited with separate letters dated 8 June 2017 to submit additional observations, by 30 June 2017, on the issues of official controls on the requirements for the monitoring of dioxin limits by feed operators and on requirements for the production of fish oil for human consumption.

| No | Recommendation |
|---|---|
| **1** | The competent authority should ensure that all feed business operators notify any establishments under their control with the view to register as required by Article 9 of Regulation (EC) No 183/2005. |
| **2** | The competent authority should ensure that only approved establishments are in the list of approved food establishments, in accordance with Article 31 of Regulation (EC) No 882/2004. |
| **3** | The competent authority should ensure compliance with the requirements of Article 3 of Regulation (EC) No 882/2004, in particular that the official controls of feed business operators take into account all relevant feed-related risks linked to activities and operations when risk-assessing, inspecting and sampling feed establishments. |
| **4** | The competent authority should ensure compliance with the requirements of Article 8(1) of Regulation (EC) No 882/2004, in particular that instructions for staff carrying out official controls reflect certain feed-specific risks such as cross-contamination, homogeneity and dioxin in feed materials. |
| **5** | The competent authority should ensure that all feed business operators have HACCP-based procedures in place in accordance with Articles 6 and 7 of Regulation (EC) No 183/2005.<br>In particular, the competent authority should ensure that feed dryers using direct drying processes have HACCP-based procedures in place to address the risk of dioxins in feed materials when these processes are applied. |
| **6** | The competent authority should ensure that establishments producing both fish oil for human consumption and fish oil/fish meal for feed receive and handle the raw |

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| | materials in line with the requirements of Annex III, Section VIII, Chapter IV, Point B of Regulation (EC) No 853/2004. |
| **7** | The competent authority should ensure that feed business operators have in place measures to control the risk of cross-contamination of coccidiostats in feed for non-target animals as laid down in Annex II to Regulation (EC) No 183/2005, in order to guarantee that the maximum permitted levels in feed for non-target animals as laid down in Directive 2002/32/EC are not exceeded. |
| **8** | The competent authority should ensure that producers of fish meal and fish oil intended as feed for farmed animals follow the relevant dioxin monitoring requirements and that feed establishments mandate laboratories to report any non-compliant result to the relevant competent authority as required by Article 5(2) of Regulation (EC) No 183/2005 and Annex II to the said Regulation. |

## 8 Annex 1 – List of abbreviations and terms used in the report

| | |
|---|---|
| ABP | Animal by products |
| Authority | EFTA Surveillance Authority |
| BTSF | Better Training for Safer Food is a Commission initiative aimed at organising a training strategy in the areas of food law. |
| EC | European Community |
| EEA | European Economic Area |
| EEA Agreement | Agreement on the European Economic Area |
| EN ISO/IEC 17025 | The standard specifies the general requirements for the competence to carry out tests and/or calibrations, including sampling. It covers testing and calibration performed using standard methods, non-standard methods, and laboratory-developed methods. |
| EU | European Union |
| HACCP | Hazard Analysis and Critical Control Point |
| IMA | The Icelandic Medicine Agency |
| Ísleyfur | Data-base, supporting inspection handbooks |
| LCA | The Local Competent Authority (independent Municipal Environmental and Public Health Offices) |
| MANCP | Single integrated multi annual national control plan |
| MAST | Icelandic Food and Veterinary Authority |
| MoII | The Ministry of Industry and Innovation |

## 9 Annex 2 - Relevant legislation

The following legislation has been taken into account in the context of this mission:

a) The Act referred to at point 9b of Part 7.1 of Chapter I of Annex I to the EEA Agreement, *Regulation (EC) No 1069/2009 of the European Parliament and of the Council of 21 October 2009 laying down health rules as regards animal by-products and derived products not intended for human consumption and repealing Regulation (EC) No 1774/2002* as corrected and amended, and as adapted to the EEA Agreement by the sectoral adaptations referred to in Annex I to that Agreement;

b) The Act referred to at Point 7.1.12 of Chapter I of Annex I to the EEA Agreement, *Regulation (EC) No 999/2001 of the European Parliament and of the Council of 22 May 2001 laying down rules for the prevention, control and eradication of certain transmissible spongiform encephalopathies*, as amended and as adapted to the EEA Agreement by the sectoral adaptations referred to in Annex I to that Agreement;

c) The Act referred to at Point 6.1.17 of Chapter I of Annex I to the EEA Agreement, *Regulation (EC) No 853/2004 of the European Parliament and of the Council of 29 April 2004 laying down specific hygiene rules for food of animal origin*, as amended and as adapted to the EEA Agreement by the sectoral adaptations referred to in Annex I to that Agreement.

d) The Act referred to in Point 1a of Chapter II of Annex I to the EEA Agreement, *Regulation (EC) No 1831/2003 of the European Parliament and of the Council of 22 September 2003 on additives for use in animal nutrition*, as amended and adapted to the EEA Agreement by the sectoral adaptations referred to in Annex I to that Agreement;

e) The Act referred to at Point 1zq of Chapter II of Annex I to the EEA Agreement, *Commission Regulation (EC) No 1334/2003 of 25 July 2003 amending the conditions for authorisation of a number of additives in feedingstuffs belonging to the group of trace elements*, as corrected and amended;

f) The Act referred to at Point 31aa of Chapter II of Annex I to the EEA Agreement, *Council Directive 98/68/EC of 10 September 1998 laying down the standard document referred to in Article 9(1) of Council Directive 95/53/EC and certain rules for checks at the introduction into the Community of feedingstuffs from third countries*;

g) The Act referred to at Point 31j of Chapter II of Annex I to the EEA Agreement, *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*, as corrected, amended and adapted to the EEA Agreement by the sectoral adaptations referred to in Annex I to that Agreement;

h) The Act referred to at Point 31l of Chapter II of Annex I to the EEA Agreement, *Commission Decision 2006/677/EC of 29 September 2006 setting out the guidelines laying down criteria for the conduct of audits under Regulation (EC) No 882/2004 of the European Parliament and of the Council on official controls*

*to verify compliance with feed and food law, animal health and animal welfare rules*;

i) The Act referred to in Point 31m of Chapter II of Annex I to EEA Agreement, *Regulation (EC) No 183/2005 of the European Parliament and of the Council of 12 January 2005 laying down requirements for feed hygiene*, as amended and adapted to the EEA Agreement by the sectoral adaptations referred to in Annex I to that Agreement;

j) The Act referred to at Point 31n of Chapter II of Annex I to the EEA Agreement, *Commission Decision 2007/363/EC of 21 May 2007 on guidelines to assist Member States in preparing the single integrated multi-annual national control plan provided for in Regulation (EC) No 882/2004 of the European Parliament and of the Council;*

k) The Act referred to at Point 31o of Chapter II of Annex I to the EEA Agreement, *Commission Regulation (EC) No 152/2009 of 27 January 2009 laying down the methods of sampling and analysis for official control of feed,* as amended*;*

l) The Act referred to at Point 33 of Chapter II of Annex I to the EEA Agreement, *Directive 2002/32/EC of the European Parliament and the Council of 7 May 2002 on undesirable substances in animal feed*, as amended;

m) The Act referred to at Point 40 of Chapter II of Annex I to the EEA Agreement, *Regulation (EC) No 396/2005 of the European Parliament and of the Council of 23 February 2005 on maximum residue levels of pesticides in or on food and feed of plant and animal origin and amending Council Directive 91/414/EEC*, as amended;

n) The Act referred to at Point 41 of Chapter II of Annex I to the EEA Agreement, *Regulation (EC) No 178/2002 of the European Parliament and of the Council of 28 January 2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety*, as amended and adapted to the EEA Agreement by the sectoral adaptations referred to in Annex I to that Agreement;

o) The Act referred to at Point 47 of Chapter II of Annex I to the EEA Agreement, *Commission Regulation (EC) No 669/2009 of 24 July 2009 implementing Regulation (EC) 882/2004 of the European Parliament and of the Council as regards the increased level of official controls on certain feed and foods of non-animal origin and amending Decision 2006/504/EC*¸ as amended*;*

p) The Act referred to at Point 47a of Chapter II of Annex to the EEA Agreement, *Commission Regulation (EU) No 16/2011 of 10 January 2011 laying down implementing measures for the Rapid alert system for food and feed;*

q) The Act referred to at Point 48 of Chapter II of Annex I to the EEA Agreement, *Regulation (EC) No 767/2009 of the European Parliament and of the Council of 13 July 2009 on the placing on the market and use of feed, amending European Parliament and Council Regulation (EC) No 1831/2003 and repealing Council Directive 79/373/EEC, Commission Directive 80/511/EEC, Council Directives 82/471/EEC, 83/228/EEC, 93/74/EEC, 93/113/EC and 96/25/EC and Commission Decision 2004/217/EC (OJ L 229, 1.9.2009, p. 1), as amended.*

r) The Act referred to at Point 9c of Chapter II of Annex I to the EEA Agreement, *Commission Regulation (EU) No 142/2011 of 25 February 2011 implementing Regulation (EC) No 1069/2009 of the European Parliament and of the Council laying down health rules as regards animal by-products and derived products not intended for human consumption and implementing Council Directive 97/78/EC as regards certain samples and items exempt from veterinary checks at the border under that Directive (OJ L 54, 26.2.2011, p. 1), as amended.*

# 10 Annex 3 – Iceland response, comments and corrective actionsThis document has been electronically signed by Lennart Johanson.

EFTA Surveillance Authority
Rue Belliard 35
B-1040, Bruxelles, Belgium

Selfoss, 14 August 2017
Ref: 1702714

Subject: EFTA Surveillance Authority´s Mission to Iceland regarding feed safety from 8 to 17 May 2017 - Iceland´s response and corrective actions.

Please find attached a table of corrective actions to be taken by Icelandic authorities on the basis of the final report and recommendations of the abovementioned mission (Annex 2) as well as some general remarks made to the content of the report (Annex 1).

Respectfully
on behalf of MAST

Ástfríður Sigurðardóttir
Senior officer
Office of legal affairs

## 10.1 Comments from Iceland

General remarks to the Draft report from the EFTA Surveillance Authority's Mission to Iceland regarding feed safety from 8 November to 17 May 2017.

**Chapter 5.2.1 Competent Authorities - Designation, responsibilities and cooperation Findings**

*The organisation and responsibilities for controls of feed business operators are described in part 1 chapter 1 of the country profile for Iceland available on the Authority webpage. (www.eftasurv.int)*

*In summary: MAST, under the auspices of MoII, is the central competent authority responsible for official controls on feed. The main responsibility lies within MAST's Office of Animal Health and Welfare*

It should be noted that the organisation and responsibilities for feed control is described in chapter 2.4 of the country profile but as discussed during the mission the text had unfortunately not been updated prior to the mission.

*Establishments producing fishmeal and fish oil which have been granted approvalfor both food and feed production are, however, mostly inspected by staff from MAST's Office of Food Safety and Consumer Affairs.*

This statement might be based on some misunderstanding. As has been described before, it is based on the type of main production of establishments with both food and feed production which office within MAST is responsible for the inspections. There is good cooperation between these units and under certain circumstances (e.g. temporary lack of staff) inspectors from either office might help out in different districts if needed.

**Chapter 5.3.2 Cross-contamination, coccidiostats in feed for non-target animals Findings**

Paragraph 4:

*It was observed by the mission team that the official sampling plan as laid down by the head office was followed with regard to substances to be analysed and sampling frequency. However, it was also noted that samples taken in order to monitor cross-contamination in feed mills using coccidiostats were taken randomly from final products and were not targeted on the lot produced immediately after the coccidiostats containing feed.*

For clarification it should be noted that in general the sampling is targeted on the lot produced after the coccidiostats containing feed. However, this was not the case in 2016 when, due to certain circumstances, this was not carried out.

**Annex 2 TOC – Table of corrective actions ESA mission 2017 regarding feed hygiene**

| No | Recommendation | Reaction of Icelandic authorities | Date of Compliance | Comment/attachment |
|---|---|---|---|---|
| **1** | The competent authority should ensure that all feed business operators notify any establishments under their control with the view to register as required by Article 9 of Regulation (EC) No 183/2005. | All larger feed producers (e.g. feed mills and fish meal plants) will be formally contacted to collect knowledge of all feed operators (brokers, retailers etc.) that should be registered and ensure their registration. | End 2017 | |
| **2** | The competent authority should ensure that only approved establishments are in the list of approved food establishments, in accordance with Article 31 of Regulation (EC) No 882/2004. | This relatively isolated incidence (finding) was corrected immediately after the mission. In general, the list is constantly updated. | Action has been taken. | |
| **3** | The competent authority should ensure compliance with the requirements of Article 3 of Regulation (EC) No 882/2004, in particular that the official controls of feed business operators take into account all relevant feed-related risks linked to activities and operations when risk-assessing, inspecting and sampling feed establishments. | The risk assessment and risk categorization for feed establishments will be updated in the coming months. Factors such as dioxins and use of coccidiostats will be taken into account. This will also be considered during the upcoming update of the control manual for feed. | End 2017 | |
| **4** | The competent authority should ensure compliance with the requirements of Article 8(1) of Regulation (EC) No 882/2004, in particular that instructions for staff carrying out official controls reflect certain feed-specific risks such as cross-contamination, homogeneity and dioxin in feed materials. | This will be further emphasized in the next version of the control manual for feed. | End 2017 | |
| **5** | The competent authority should ensure that all feed business operators have | MAST will send a letter to the feed dryers before 1 September to inform them about | 1.9.2017 | |

**Annex 2 TOC – Table of corrective actions ESA mission 2017 regarding feed hygiene**

| | | | | |
|---|---|---|---|---|
| | HACCP-based procedures in place in accordance with Articles 6 and 7 of Regulation (EC) No 183/2005. In particular, the competent authority should ensure that feed dryers using direct drying processes have HACCP-based procedures in place to address the risk of dioxins in feed materials when these processes are applied. | the requests for HACCP plans for their production.<br>A deadline for making the plans will be set for end of the year 2017. | End 2017 | |
| **6** | The competent authority should ensure that establishments producing both fish oil for human consumption and fish oil/fish meal for feed receive and handle the raw materials in line with the requirements of Annex III, Section VIII, Chapter IV, Point B of Regulation (EC) No 853/2004. | Currently, these are the main conditions laid down when the establishments seek for permission to produce fish oil intended for refining to make it fit for human consumption. However, this will be further followed-up and ensured in the next regular visits. | | |
| **7** | The competent authority should ensure that feed business operators have in place measures to control the risk of cross-contamination of coccidiostats in feed for non-target animals as laid down in Annex II to Regulation (EC) No 183/2005, in order to guarantee that the maximum permitted levels in feed for non-target animals as laid down in Directive 2002/32/EC are not exceeded. | Action has been taken in the two feed mills producing feed with coccidiostats and they are given time until October 2017 to do adequate sampling and analysis.<br>They will also be encouraged to ensure proper homogeneity of the mixes and be able to confirm it. | 01.10.2017 | |
| **8** | The competent authority should ensure that producers of fish meal and fish oil intended as feed for farmed animals follow the relevant dioxin monitoring requirements and that feed establishments mandate laboratories to report any non-compliant result to the relevant competent | MAST will send a letter to all fish meal and oil plants to inform them about this request. Contact will also be made with the laboratories. | End 2017 | |

**Annex 2 TOC – Table of corrective actions ESA mission 2017 regarding feed hygiene**

| | | | | |
|---|---|---|---|---|
| | authority as required by Article 5(2) of Regulation (EC) No 183/2005 and Annex II to the said Regulation. | | | |