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DRAFT REPORT OF A MISSION CARRIED OUT IN CHINA FROM 17 MARCH TO 27 MARCH 2009 IN ORDER TO EVALUATE THE IMPLEMENTATION OF MEASURES CONCERNING REQUIREMENTS FOR PET FOOD OF ANIMAL ORIGIN

Executive Summary

This report describes the outcome of a mission carried out by the Food and Veterinary Office in China, from 17 to 27 March 2009.

The overall objectives of the mission were to verify compliance with conditions for importation of pet food of animal origin, as indicated in Regulation (EC) No 1774/2002, and assess whether the systems for health certification of pet food of animal origin to be exported to the EU follow rules and principles at least equivalent to those laid down in Directive 96/93/EC.

In terms of scope, the mission concentrated on: a) the approval of plants exporting pet food of animal origin to the EU; b) the type of animal by-products (ABP) used for production of pet food of animal origin, processing standards and microbiological hygiene of products ready to be exported to the EU; c) the organisation and implementation of official controls on plants exporting pet food of animal origin to the EU; and d) health certification procedures on the aforementioned requirements.

Overall, the CCA have taken satisfactory steps to offer guarantees that production of pet food of animal origin imported into the EU from China follows requirements largely equivalent to those laid down in Regulation (EC) No 1774/2002 and, therefore, the requirements set out in the model health certificates laid down in Chapter 3(A), 3(B) and 3(C) of Annex X to Regulation (EC) No 1774/2002 are largely complied with. However, there are certain doubts on the reliability of the attestation on the absence of specified risk material in the the production of pet food, although these has to be seen in the context of the limited ABP of ruminant origin used for the production of pet food other than dog chews.

The reason of the above deficiency is that the attestation concerning the type and source of ABP used for the production of pet food is made on the basis of data of which certifying officers have not personal knowledge or whose accuracy they can not verify. Nevertheless, considering the limited used of the concerned material, the system for health certification of pet food of animal origin to be exported to the EU could be considered largely satisfactory.

The report makes a number of recommendations addressed to the Chinese authorities, aimed at rectifying the shortcomings identified and further enhancing the implementing and control measures in place.

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ABBREVIATIONS & SPECIAL TERMS USED IN THE REPORT

Abbreviation	Explanation
ABP	Animal by-products not intended for human consumption
AHVS	Animal Husbandry and Veterinary Station
AQSIQ	General Administration of Quality Supervision, Inspection and Quarantine of the People's Republic of China
BSE	Bovine Spongiform Encephalopathy
CA	Competent Authority(ies), as appropriate
CCA	Central Competent Authority
CIQ	Entry-Exit Inspection and Quarantine Bureau
DSAPQ	Department for Supervision on Animal and Plant Quarantine
EU	European Union
FVO	Food and Veterinary Office
HACCP	Hazard analysis and critical control points
MoA	Ministry of Agriculture
NFO	National Feed Office
OIE	World Organisation for Animal Health
OV	Official Veterinarian
PAHO	Provincial Animal Husbandry Office
QTSB	Quality Technical Supervision Bodies
SRM	Specified risk material
VB	Veterinary Bureau

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1 INTRODUCTION

The mission took place in China from 17 to 27 March 2009.

The inspection team, which comprised two inspectors from the Food and Veterinary Office (FVO), was accompanied throughout the mission by representatives from the central competent authority (CCA), the Department for Supervision on Animal and Plant Quarantine (DSAPQ) of the General Administration of Quality Supervision, Inspection and Quarantine of the People's Republic of China (AQSIQ). Staff of the Veterinary Bureau (VB) and the National Feed Office (NFO) of the Ministry of Agriculture (MoA) also accompanied the mission team at different stages of the mission.

An opening meeting was held on 17 March 2009 with representatives of the CCA and the other competent authorities (CA), during which the mission objectives, itinerary, and the standard reporting and follow-up procedures were confirmed, and additional information required for the satisfactory completion of the mission was requested.

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2 OBJECTIVES OF THE MISSION

The overall objectives of the mission were to:

- Verify compliance with conditions for importation of pet food of animal origin, including dog chews, from China into the European Union (EU), as indicated in the relevant export health certificates laid down in Chapters 3(A), (B) and (C) of Annex X to Regulation (EC) No 1774/2002 of the European Parliament and of the Council; and
- Assess whether the systems put in place by the Chinese CA provide guarantees that health certification of pet food of animal origin to be exported to the EU follows rules and principles at least equivalent to those laid down in Council Directive 96/93/EC.

In terms of scope, the mission concentrated on the area of pet food of animal origin and, in particular, on:

- The requirements set out in Art. 18 of, and Chapter II of Annex VIII to Regulation (EC) No 1774/2002 as regards approval of plants exporting pet food of animal origin to the EU;
- The requirements set out in Chapter II of Annex VIII to Regulation (EC) No 1774/2002 as regards the type of animal by-products (ABP) used for the production of pet food of animal origin, processing standards used in pet food plants and microbiological hygiene of products ready to be exported to the EU;
- The organisation and implementation of official controls in accordance with Art. 26 of Regulation (EC) No 1774/2002 on plants exporting pet food of animal origin to the EU; and
- The organisation and implementation of health certification procedures so as to assess the level of guarantees provided by the CA that the requirements in the

aforementioned areas are complied with.

In pursuit of the above objectives the mission team visited the provinces of Jiangsu, Shandong, Zhejiang and Hebei and the administrative areas of Beijing and Shanghai, where the following meetings were held and sites visited:

Competent authorities visits			**Comments**
Competent authorities	Central	**2**	Opening and closing (de-briefing) meetings.
	Regional	**6**	Meetings with CIQ and PAHO representatives at their headquarters in the provinces and administrative areas visited.
	Local	**9**	Discussions held with CIQ staff and staff of the AHVS in the course of visits to premises.
Sites			
Pet food plants		**8**	Plants producing different types of pet food of animal origin to be exported to the EU.
Slaughterhouses		**1**	One slaughterhouse slaughtering cattle.

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3 LEGAL BASIS FOR THE MISSION

The mission was carried out in agreement with the Chinese authorities and under the general provisions of Community legislation, in particular Art. 46 of Regulation (EC) No 882/2004 of the European Parliament and of the Council and Art. 31 of Regulation (EC) No 1774/2002.

Full legal references are provided in the Annex. Legal acts quoted in this report refer, where applicable, to the last amended version.

4 BACKGROUND

Imports of pet food of animal origin to the EU currently take place on the basis of provisions of Regulation (EC) No 1774/2002, which require consignments of this commodity to be subject to the presentation of health certificates before entering the EU. In this regard, it is worth mentioning that:

- According to Art. 28 of Regulation (EC) No 1774/2002, general provisions that apply to the importation of pet food of animal origin as referred to in Annex VIII to the said Regulation, shall be no more favourable or less favourable that those applicable to the production and marketing of those products in the EU.
- According to Art. 29 of the said Regulation, importation may take place only if pet food of animal origin satisfies some other requirements, in particular, that it comes from a third country or parts of third countries on a list to be drawn up and regularly updated by the Commission. The list may be combined with other lists drawn up for public and animal health purposes; hence, for the time being the list of third countries that can export to the EU pet food of animal origin, including dog chews, is laid down in Annex XI (Part X) to Regulation (EC) No 1774/2002 and it includes those third countries listed in part 1 of Annex II to Council Decision 79/542/EEC (and another three countries on the basis of specific decisions in that respect). China is included on that list.
- Pet food of animal origin must come from plants on a Community list drawn up on the basis of a communication from the CA of the third country to the Commission declaring that the plant complies with the Community requirements and is subject to supervision by an official inspection service in the third country. At the moment, provisions in the said Art. 29 give the possibility that pending the compilation of the aforementioned list, Member States may maintain the controls provided for in Council Directive 97/78/EC and it is up to each of them to agree with the Chinese CA on the list of plants that, provided compliance with Community requirements is guaranteed, can export to the Member State.
- Art. 29 also requires that a health certificate corresponding to the model laid down in Annex X to the said Regulation must accompany consignments of pet food of animal origin, certifying that it meets the conditions referred to in Annex VIII (Chapter II) therein and come from plants offering such conditions.
- The main attestations to be included in those model health certificates are laid down in Chapters 3(A), (B) and (C) of the said Annex X as regards, respectively, canned pet food, processed pet food other than canned pet food and dog chews.
- Annex X to Regulation (EC) No 1774/2002 also requires that the original of the health certificate must be completed and signed by an official veterinarian (OV). In doing so, the CCA of the exporting country shall ensure that principles of certification equivalent to those laid down in Council Directive 96/93/EC are followed.

Given that China is allowed to export to the EU fresh fishery products for human consumption, but not fresh meat of terrestrial animals, according to Part VII(B) of Annex

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XI to Regulation (EC) No 1774/2002, Member States may only authorised the import raw pet food of fish origin. Most pet food of animal origin imported from China consists of dog chews.

Since China is considered a country with an undetermined Bovine Spongiform Encephalopathy (BSE) risk according to Commission Decision 2007/453/EC; according to Annex IX (Chapter D, Section B) to Regulation (EC) No 999/2001 of the European Parliament and of the Council, this status implies that imports to the EU of pet food produced with ABP from bovine, ovine and caprine origin have to be accompanied by a health certificate including attestations that the products do not derive from or do not contain specified risk material (SRM) as defined in Annex V to the said Regulation , nor do they derive from animals that have been slaughtered after stunning by means of injecting gas into the cranial cavity or by laceration of central nervous tissue.

Within the framework set by the objectives and scope of this mission, the assessment carried out did not include an evaluation of the animal health situation in China and this area was only covered insofar as necessary to understand possible risks in that regard that could remain unmanaged in pet food of animal origin imported into the EU. Likewise, the official control systems in place in China for the food sector were not assessed in depth but only insofar as sufficient information could be gathered to exclude the possibility that other ABP than those referred to in Art. 6(1)(a) to (j) of Regulation (EC) No 1774/2002 are used for the production of pet food of animal origin to be exported to the EU; hence, the assessment was not aimed at ascertaining whether official controls are in a position to offer guarantees equivalent to Community legislation on the hygienic production of products of animal origin, such as meat, poultry or milk.

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5 FINDINGS AND CONCLUSIONS

5.1 APPROVAL OF PLANTS EXPORTING PET FOOD OF ANIMAL ORIGIN TO THE EU

5.1.1 Legal requirements

Provisions laid down in Annex VIII (chapter II, Part C, point (b)) to Regulation (EC) No 1774/2002 set out that Member States must authorise importation of pet food of animal origin if they come from pet food plants approved in accordance with Art. 18 of the said Regulation. Art.18 requires that pet food plants shall be subject to approval by the CA and that to be approved, these plants must undertake, in the light of the specific requirements laid down in Annex VIII (Chapter II, Parts A and B) to the said Regulation for production of pet food of animal origin:

- to comply with the specific production requirements set out in the said Regulation;
- to establish and implement methods of monitoring and checking the critical control points on the basis of the process used;

- depending on the products, to take samples for analyses in a laboratory recognised by the CA for the purposes of checking compliance with the standards established by the said Regulation;
- to keep a record of the information obtained pursuant to the previous points for presentation to the CA. The results of the checks and tests shall be kept for at least two years;
- to inform the CA, should the result of the laboratory examination referred to above or any other information available to them reveal the existence of a serious animal health or public health hazard.

Art. 18 of Regulation (EC) No 1774/2002 also requires that approval shall be suspended immediately if the conditions under which it was granted are no longer fulfilled.

5.1.2 Findings

According to the CCA, as of December 2008 there were altogether 157 plants producing pet food of animal origin that had been registered by the Entry and Exit Inspection and Quarantine Bureaus (CIQ) of the AQSIQ, so that they can export this commodity under their supervision. Amongst them, 92 plants have been registered as exporters to the EU and the list has been submitted to the importing Member States; most plants are situated in the provinces of Shandong (30 plants), Zhejiang (26 plants) and Jiangsu (12 plants).

The main types of pet food of animal origin exported from China are canned pet food, dog chews and other processed (dry) pet food; between 2006 and 2008, the average annual amount of pet food of animal origin exported from China was around 90,000 tons, out of which some 20% were imported into the EU, mainly in the form of dog chews, and the balance mostly exported to the United States (30%) and Japan (30%). According to representatives from AQSIQ, all consignments dispatched to the EU are directly sent from pet food plants to the (air)port of dispatch and there is no storage plant approved to act as an intermediary on that chain.

Main suppliers of ABP for the production of pet food are slaughterhouses, meat processing plants and cold storage plants for edible meat (beef, lamb, pork, poultry meat), seafood processing plants and leather processing plants.

Representatives from AQSIQ advised the mission team that the approval system set up for plants that produce pet food of animal origin to be exported to the EU had been reinforced in June 2008. This has been done with the introduction of two new operating Circulars, with numbers 35 and 78: Circular 35 includes new guidelines and instructions that mirror Community requirements in that respect addressed to operators of pet food plants for them to be aware of the conditions to be fulfilled in order to be approved; Circular 78 lays down, amongst other things, guidelines for CIQ staff to carry out pre-approval checks on the plants so that they can verify whether areas such as sourcing of raw materials, their processing and the microbiological standards of the final products are in compliance with those Community requirements.

In general, feed manufacturers, including pet food operators, are covered by specific rules on their approval for the domestic market; this system is managed by the NFO through its provincial offices and it is extensively regulated. However, there are two

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exceptions to this approval system:

- Pet food plants that only use material of animal origin do not need to be approved under feed legislation for the domestic market;
- Producers of dog chews are not covered by any approval system administered by the MoA for the domestic market as these products have been so far considered toys and not feed.

The NFO approval, where needed, is a pre-requisite for any operator that intends to export before the CIQ can start to consider this application and proceed with the specific approval for that purpose, which is done on the basis of the Circulars mentioned above. In this case, any operator that wants to start exporting pet food of animal origin to the EU, regardless of the type of pet food produced (including dog chews) and the feed materials used, must be approved by AQSIQ.

The mission team noted that:

- Approval systems were already in place before the entering into force of the new Circulars; they operated along the lines of the reinforced requirements but this activity was not as harmonised as it is now with the new provisions and each CIQ had to organise its own approval system at provincial level. Examples of approvals in place before the re-approval carried out under the new requirements contained in Circular 78 were discussed with staff of several CIQ; they underlined that the previous approval procedure already required a hazard analysis and critical control points (HACCP) - like system to be in place and that a specific checklist containing all EU requirements had been in use for a number of years. In several cases, staff from the CIQ pointed out that the major enhancements for the new system were the major emphasis put on the qualification of suppliers, that must be now checked by the pet food manufacturer and approved and short-listed before they can start to supply the raw material, and also the higher importance given to traceability that must be ensured at all stages of the production chain, including the suppliers. Some operators also emphasized that microbiological criteria were more stringent in the new provisions.
- In some provinces, approvals are carried out by a team of experts who are not working for the local CIQ branch in order to avoid possible conflicts of interest and to separate the pre-approval check from the regular inspections. In most of the provinces visited, with few exceptions, all operators had been re-approved by the CIQ since September 2008 in line with the new requirements. However, in one province, the process had been slower and CIQ staff met at the pet food plants was hardly aware of the new Circulars; nonetheless, CIQ staff was very familiar with a detailed manual including the previous requirements for the approval of the plants that they had been using for a number of years and that did not differ significantly from the standards introduced by the new Circulars.
- Plants approved by AQSIQ to export pet food of animal origin to the EU are bound since June 2008 by domestic requirements laid down in Circulars 35 and 78 that include provisions that the only ABP that may be used for that purpose are those referred to in Art.6(1)(a) to (j) of Regulation (EC) No 1774/2002. Only material fit for human consumption can be used for any purpose that involves the food or the

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feed chain; material dispatched from slaughterhouses must be stamped as such by an official veterinarian (OV) of the relevant Animal Husbandry and Veterinary Station (AHVS) of the Provincial Animal Husbandry Offices (PAHO); OV must also sign animal health certificates that accompany any product of animal origin to their first destination and up until it is further processed to manage any possible animal health risk.

- In the pet food plants visited, pre-approval checks carried out by CIQ staff had been in general comprehensive and covered most aspects in accordance with EU requirements; in most cases several visits had been necessary before the approval could be granted because there were outstanding issues, such as incomplete HACCP systems, inadequate record keeping, insufficiently accurate temperature measurement devices or unsatisfactory microbiological testing. In all cases, CIQ staff had given recommendations to the operators who had to fix these issues before they could re-start with the exports to the EU. As a result, at the time of the visit carried out by the mission team all plants could present evidence of:
    - being implementing methods of monitoring and checking the critical control points on the basis of the process used; examples were seen of plants producing canned pet food, dried pet food and dog chews where the HACCP systems in place may be considered adequate as measures to manage the critical control points identified (e.g. acceptance of raw material, microbiological checks to ensure functioning of the processing parameters or presence of metal detectors) appeared to be suitable for the processing going on and the risks involved in each of them.
    - being taking samples for analyses for the purposes of checking compliance with the microbiological standards established by EU requirements. Analyses are carried out in laboratories accepted by the CA for that purpose, which were in the process of being accredited following ISO 17025 certification rules;
    - keeping a record of the information obtained pursuant to the previous points for presentation to the CA.
- The pre-approval system carried out by CIQ staff pays little attention though to the assessment of compliance of suppliers selected and checked by the operators with requirements on the type of ABP that are going to be used for the production of pet food exported to the EU. In response to the mission team's enquiries in that respect, CIQ staff declared that the system in place operates on the basis of trusting certification and control activities carried out by other official bodies, such as the PAHO or other departments from AQSIQ, with responsibilities upstream in the animal production chain (see 5.2.2.1 for weaknesses in this respect).
- In relation to action that can be taken by the CIQ concerning temporary suspension or withdrawal of approvals if the conditions under which they have been granted are no longer fulfilled, representatives of AQSIQ advised the mission team that legal requirements were in force since 1997 that would so allow if compliance with requirements of the importing party are not ensured. In addition, general requirements from the feed sector would apply to operators approved under national legislation if the violation would be related to these legal requirements. Finally, new

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legal requirements on official controls to be carried out by CIQ staff on feed destined for export was about to enter into force at the time of the mission and will facilitate taking immediate action directly by CIQ staff in case of non-compliance with export requirements. Examples were checked by the mission team in relation to temporary suspensions of several EU export approvals in pet food plants producing dog chews where microbiological analyses had shown positive results. Only after specific measures had been taken by the operators to increase the level of hygiene and they could also demonstrate that no positive result was detected anymore, the CIQ reinstated the approval while also reinforcing follow-up controls for a certain time at these operators.

- The plants visited by the mission team were very modern and with highly developed hygienic and traceability systems in place; there was no evidence that these were not representative of the 92 plants proposed by AQSIQ to the EU, since some of the visited plants were selected on-the-spot at the request of the mission team.

5.1.3 Conclusion

1. In principle, since June 2008 the approval system set up by the AQSIQ for plants that produce pet food of animal origin to be exported to the EU can operate along the lines of Community requirements laid down in Art. 18 of Regulation (EC) No 1774/2002, although there were deficiencies in pre-approval checks to ensure compliance with requirements on the type of ABP that may be used for production (see 5.2.3(1) for further details). Aside from the latter, the CCA can offer guarantees at least equivalent to the approval system for pet food plants set out by Regulation (EC) No 1774/2002 in order to be in a position to so certify in accordance with point II.1 of the health certificates laid down in Chapters 3(A), (B) and (C) of Annex X to the said Regulation.

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5.2 PRODUCTION REQUIREMENTS FOR PET FOOD OF ANIMAL ORIGIN IMPORTED INTO THE EU

5.2.1 Legal requirements

Provisions laid down in Annex VIII (chapter II, Part C, point (c)) to Regulation (EC) No 1774/2002 set out that Member States must authorise importation of pet food of animal origin if it has been produced in accordance with requirements of this Regulation. These requirements are as follows:

- Point II.2 of the above health attestations lays down the ABP that can be used for the production of pet food of animal origin. The ABP mentioned coincide with those set out in Art.6(1)(a) to (j) of Regulation (EC) No 1774/2002, plus material from animals which have been treated with certain substances which are prohibited pursuant to Council Directive 96/22/EC. In addition, according to Annex IX

(Chapter D, Section B) to Regulation (EC) No 999/2001, imports from China to the EU of pet food produced with ABP from bovine, ovine and caprine origin have to be accompanied by a health certificate including attestations that the products do not derive from or do not contain SRM as defined in Annex V to the said Regulation, nor do they derive from animals that have been slaughtered after stunning by means of injecting gas into the cranial cavity or by laceration of central nervous tissue.

- Point II.3 of the above health attestations lays down the processing standards for the production of pet food of animal origin; these coincide with those laid down, as appropriate, in Annex VIII (Chapter II, Part B, point 2 to 4) to Regulation (EC) No 1774/2002.
- Point II.4 of the above health attestations for processed pet food other than canned pet food and for dog chews, require that five random samples must be taken from each processed batch during or after storage at the processing plant to verify compliance with microbiological hygiene standards on *Salmonella* spp. (absence in 25 gram), and *Enterobacteriaceae* (maximum threshold set for total bacteria count); these requirements coincide with those laid down in Annex VIII (Chapter II, Part B, point 6) to Regulation (EC) No 1774/2002.
- Point II.4 of the above health attestation for canned pet food requires that,before being certified to be imported in the EU, the consignment is analysed by a random sampling of five containers from each processed batch by laboratory diagnostic methods to ensure its adequate heat treatment as indicated in point II.3 above.
- Point II.5 of the above health attestations require that, after pet food and dog chews have been submitted to treatment, every precaution must be taken to ensure that such products are not exposed to contamination.
- In addition, point II.6 of the above health attestations require that processed pet food and dog chews must be packed in new packaging.

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5.2.2 Findings

5.2.2.1 ABP used for the production of pet food of animal origin imported into the EU

Concerning products of animal origin not processed or that are not intended for the food chain once processed, the MoA is responsible for ensuring compliance with requirements on animal health and hygiene of the initial steps of production, in particular at slaughterhouses. In case of processed products coming from food establishments, compliance with national legislation in that respect is ensured by the approval of the establishments by the Ministry of Public Health and by controls on quality, safety and hygiene carried out during production and processing by the local Quality Technical Supervision Bodies of the Department of Supervision on Food Production (QTSB) of AQSIQ . The latter is responsible for establishments that are operating only for the domestic market; otherwise, in case of food establishments, including slaughterhouses, that are authorised to export, the CIQ is in charge of their approvals for that purpose and

of their official control.

The mission team noted that:

- Veterinary certificates must accompany all raw ABP coming from slaughterhouses as issued by OV of the AHVS; according to national rules, these certificates ensure that the animal products have been produced following national legislation, in particular that they are fit for human consumption as coming from animals that have passed *ante-* and *post-mortem* inspections carried out by these OV, and that there is no animal health risk involved in the movement of the products. Carcasses must be stamped by OV only if they have been passed fit for human consumption.
- Comprehensive and updated legal requirements and standards cover most aspects of food and feed safety and also animal health. For instance, animals sent to an slaughterhouse must have passed a health check carried out by an OV before their transportation is allowed; once at the slaughterhouse, *ante-* and *post-mortem* inspection rules for mammals and poultry are in place and they appear to be in accordance with Community legislation as Chinese standards and guidance in this respect follow Community requirements since 2001. Material condemned in slaughterhouses must be destroyed by incineration. OV met were well aware of these practices.
- There are sporadic notifications in several provinces of outbreaks of diseases such as Foot and Mouth Disease, Classical Swine Fever, Newcastle Disease or Highly Pathogenic Avian Influenza; a vaccination policy is also in place for certain areas for the first three diseases. Other diseases, such as Brucellosis or Tuberculosis, are endemic in different populations of animals. During the meetings held with representatives of the PAHO and AHVS, they described the system in place that deals with these contingencies and existing measures were discussed with respect to their preparation to handle notifications of outbreaks occurring in other provinces and to how they can cope with situations where traceability and recalling of products of animal origin possibly originating in the infected areas would be necessary. They advised the mission team that their main defence mechanism is that, in case of an outbreak, an immediate stop occurs to the issuing by OV of veterinary certificates for products of animal origin which originate in the infected areas. However, the capability of the system to ensure traceability of the raw materials to the farms of origin of the animals was limited and the representatives from the MoA acknowledged that they could only trace products back to the slaughterhouse of origin and that only recently they had started to set up a system that should gradually enable them to trace bovines up to their farms of origin; after that, it is their intention to extend this system to other species. Nonetheless, the mission team could verify that many pet food plants were receiving raw materials (mainly chicken breasts) in containers labelled with sufficient information to trace the products back to the farm of origin; according to some of the operators met, this is part of their pre-requisites for the approval of suppliers in order to comply with new rules on traceability in place since 2008 (see 5.1.2).
- All animals dead on-farm must be burned and buried under supervision of an OV of the AHVS and former foodstuffs and catering waste are forbidden for use in feed. In

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the plants visited, the mission team did not find any evidence that might imply that these rules are not complied with and that any of these products could end up in the chain of production of pet food for the EU market.

- Processed products of animal origin coming from the food chain, such as gelatin used for the production of dog chews, are not accompanied by any official document similar to certificates issued by staff of the AHVS. These products can be produced with any raw material including bones and no rules exist concerning SRM. Representatives from AQSIQ acknowledged that the only possible risk might be the use of vertebral column for the production of processed products (e.g., gelatin) but, according to them, use of those products for pet food is very unusual. They further added that they were about to introduce SRM rules to prevent that from happening.
- Dog chews are usually produced from bovine hides. The chain of supply of bovine hides to be used as raw materials for the production of dog chews consisted of a significant number of intermediaries and leather production sites; the CA responsible for the latter operators is the MoA, in particular, staff of the AHVS who must issue certificates that accompany the products (processed or not) to their next destination, including pet food plants. However, no CA was in a position to confirm to the mission team which one is the responsible for controls of the intermediaries. The intention of the certificates issued by the AHVS is to ensure that no contagious disease is spread by the circulation of these products of animal origin. The mission team discussed with representatives of several AHVS and operators of plants producing dog chews procedures in place for the different stages of processing happening with the raw hides; in principle, activities such as the use of standard chemical processing (e.g., salting, alkaline and acid washings), the drying in the sun done by the intermediaries or the drying and heat treating carried out by the pet food plants, appear to be sufficient to inactivate possible remaining infectious material that could be present in the raw hides.
- Apart from the prohibition to incorporate it in feed intended for ruminants, there is no restriction on the use of SRM; as it is considered fit for human consumption and allowed in the Chinese food and feed chains. Nevertheless, Circulars 35 and 78 require that operators producing pet food of animal origin to be exported to the EU must manufacture in accordance with EU requirements, and that the CIQ shall quarantine and supervise in that respect. According to representatives of AQSIQ, this should ensure that SRM would not be used in pet food for export to the EU. They further added that since 1997 it is a legal requirement that the quarantine of animal and plant products to be exported shall conform to import regulations in the target countries or regions. According to this, pet food of animal origin for export to the EU had already to conform to EU requirements before the reinforced regime was introduced in 2008. However:
    - The mission team could not be provided with any evidence of any sharing of information between AQSIQ and the MoA that should have drawn the attention of staff from the latter on a) the only ABP that can be used for production of pet food to be exported to the EU, or b) which pet food plants are actually authorised by AQSIQ for doing that. As a consequence, there is no statement

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on any certificate issued by staff of the AHVS that indicates whether the consignment contains SRM or not. Representatives of the several CA met during the mission stressed the fact that most SRM are usually used in China for the food chain (or exported to other Asian countries) and that the ABP received by pet food plants exporting to the EU mostly consist of lean meat, less often of red offal, and of cattle and buffalo hides in the case of producers of dog chews. The mission team could verify that this was the case in the pet food plants visited, where the main ABP used were poultry meat and hides;

- In case of processed products coming from food establishments, there was no guarantee, whether from the legal point of view or related to sharing of information between the different CA involved, to ensure that SRM are not used for the production of processed products of animal origin such as gelatin or rendered fats. Representatives of the CA met acknowledged that there has not been any specific communication between the different CA involved in this production chain to raise the attention on this issue. Evidence in this respect was found in one of the pet food plants visited where the operator advised the mission team that they were not in a position to exclude that vertebral column from cattle had been used for the production of the gelatin they were using for manufacturing dog chews for the EU market. CIQ staff met at the plant acknowledged that they had not checked that area when they performed their pre-approval checks following the provisions of the new Circulars.

- Import controls carried out by AQSIQ on products that might end up in the production of pet food to be exported such as hides and skins are comprehensive and stringent; for instance, irrespective of their intended use, hides and skins must come from animals that have passed *ante-* and *post-mortem* inspections in their countries of origin. Moreover, imported products of animal origin can not contain SRM, not even in case of products coming from countries or regions with a negligible BSE risk status according to the OIE.

- According to the CA, material from animals which have been treated with certain substances which are prohibited pursuant to Council Directive 96/22/EC is not allowed in the food and feed chain; imports of such products are not allowed either . As a consequence, the only ABP that can be legally used in the production of pet food of animal origin are those set out in Art.6(1)(a) to (j) of Regulation (EC) No 1774/2002.

- Substances like Clenbuterol, Nitrofurans or Chloramphenicol are forbidden and are extensively checked; when detected, the concerned products must be destroyed. Some antibiotics are still permitted and extensively used as growth promoters as opposed to the situation in the EU; since their use is legal, there is very limited check of their possible residues. Moreover, in the case of raw poultry products sourced from slaughterhouses not approved for export, it can not be excluded that acidified sodium chloride has been used for antimicrobial surface treatment of carcasses.

- All plants visited approved by AQSIQ to export pet food and dog chews of animal origin to the EU were aware of the requirements that the only ABP that may be used

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for producing those products are those referred to in Art.6(1)(a) to (j) of Regulation (EC) No 1774/2002 and, with respect to raw materials, all of them had systems in place, including regular audits of their suppliers, that should largely ensure that they can comply with them.

5.2.2.2 Processing standards in pet food plants

Circulars 35 and 78 contain detailed descriptions of EU requirements in this area; those must be verified by CIQ staff before a plant is approved for exporting to the EU and regularly kept under official control through inspections carried out by staff from the same CIQ (see also 5.3).

The mission team noted that:

- Plant visited where canned pet food was produced could demonstrate that the raw materials were subjected to heat treatment to a minimum Fc value of 3 in hermetically sealed containers; specific (critical) control points had been set up to ensure that and additional microbiological checks were carried out for each batch to look for the presence of 'markers' such as *Clostridia* spp.
- In those plants where processed pet food other than canned pet food was produced, such as dried pet food, raw materials were coming mostly fresh or frozen and the operators could demonstrate that they were subjected to a heat treatment of at least 90 °C throughout the substance of the final product. Critical control points had been set up to ensure that that temperature is always reached and microbiological checks were carried out for each batch as required to confirm the appropriate heat treatment.
- Plants producing dog chews could demonstrate that raw materials were subjected to a treatment during processing sufficient to destroy pathogenic organisms, including *Salmonella* spp.

5.2.2.3 Microbiological hygiene standards

Circulars 35 and 78 contain detailed descriptions of EU requirements in this area; those must be verified by CIQ staff before a plant is approved for exporting to the EU and regularly kept under official control through inspections carried out by staff from the same CIQ (see also 5.3.2).

The mission team noted that:

- In all plants visited there was a system in place to verify compliance with microbiological criteria as required by Regulation (EC) No 1774/2002; this was part of the quality control or HACCP systems in place, and they were also part of the regular controls carried out by CIQ staff before issuing veterinary certificates for the EU:
  - in the plants visited processing pet food other than canned pet food and those producing dog chews, five random samples are usually taken from each processed batch during or after storage at the processing plant to verify

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compliance with microbiological hygiene standards on *Salmonella* spp. and *Enterobacteriaceae*.

- in the plants visited processing canned pet food, consignments to be exported are usually analysed by taking five random samples from each processed batch; these are submitted for laboratory analysis to ensure its adequate heat treatment.

- In some of the plants there had been excessive counts of *Enterobacteriaceae* in the past; this had been identified as post-processing contamination deriving either from manipulation of the final products while packaging or from an inadequate storage in relation to humidity levels. These situations had been identified by CIQ staff during official controls, measures had been taken by the operators and no additional positive result had been found afterwards.
- At the time of the mission, the final say on the microbiological standards of the consignments to be exported to the EU relied 100% on samples taken by CIQ staff and sent to official laboratories for analysis. Representatives from the DSAPQ advised the mission team that doing that for each consignment implies a very heavy burden on the official side and that it was their intention to pass this responsibility on to the operators while setting up a verification system that should also regularly, but not for all consignments, check the reliability of the sampling and of the private laboratories involved. Since compliance with this is the responsibility of the operators, in case they failed to do so they will be punished as new legal provisions on official controls to be carried out by CIQ staff on feed destined for export (see 5.1.2) would make easier taking immediate action directly by CIQ staff in case of non-compliance with export requirements.

5.2.2.4 Conditions for pet food ready to be exported to the EU

The mission team noted that:

- In all plants visited, and in particular in those where there had been problems identified in that respect, specific measures had been put in place to ensure that products ready to be exported to the EU are not exposed to contamination. In addition, these products had always been packed in new packaging.

5.2.3 Conclusions

1. ABP used for the production of pet food of animal origin to be exported to the EU largely respect the requirements set out in part II.2 of the health attestations included in the model health certificates laid down in Chapters 3(A), (B) and (C) of Annex X to Regulation (EC) No 1774/2002. However, gaps deriving from the absence of sufficient assurances at pre-certification stages cast doubts on the reliability of the attestation required by Annex IX (Chapter D, Section B) to Regulation (EC) No 999/2001 on the absence of SRM in the material used for production; this would also affect compliance with the above mentioned health attestations included in the

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model health certificates laid down in Chapters 3(A), (B) and (C) of Annex X to Regulation (EC) No 1774/2002. Nevertheless, the relevance of this requirement is mitigated by the pet food imported into the EU from China, which consists mainly of dog chews, and the limited amount of ABP of ruminant origin used in the production of other pet food.

2. All plants visited approved by AQSIQ to export pet food of animal origin to the EU can provide guarantees that processing standards used therein are equivalent to those laid down in Annex VIII (Chapter II, Part B, points 2 to 4) of Regulation (EC) No 1774/2002 and to so certify in accordance with point II.3 of the health certificates that conform to the models laid down in Chapters 3(A), (B) and (C) of Annex X to the said Regulation.
3. Before being certified to be imported in the EU, consignments of pet food of animal origin are analysed to verify their microbiological hygiene standards or that they have been submitted to an adequate heat treatment, as appropriate, in accordance with requirements laid down in Annex VIII (Chapter II, Part B, point 6) of Regulation (EC) No 1774/2002 and point II.4 of the health certificates that conform to the models laid down in Chapters 3(A), (B) and (C) of Annex X to the said Regulation.
4. Pet food and dog chews that had been submitted to treatment had been packed in new packaging and effective measures and precautions appear to have been taken to ensure that these products have not been exposed to contamination that could affect their hygiene status. This can be considered equivalent to relevant requirements laid down in Annex VIII (Chapter II, Part B, points 3 and 4) of Regulation (EC) No 1774/2002 and would allow to so certify in accordance with points II.5 and II.6 of the health certificates that conform to the models laid down in Chapters 3(A), (B) and (C) of Annex X to the said Regulation.

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5.3 OFFICIAL CONTROLS ON PLANTS EXPORTING PET FOOD OF ANIMAL ORIGIN TO THE EU

5.3.1 Legal requirements

Point II.1 of the health attestation included in the health certificates that conform to the models laid down in Chapters 3(A), (B) and (C) of Annex X to the Regulation (EC) No 1774/2002 as regards, respectively, canned pet food, processed pet food other than canned pet food and dog chews, requires that these products are prepared in plants supervised by the CA in accordance with Art.18 of the said Regulation.

Art.18(2)(b) of Regulation (EC) No 1774/2002 requires plants producing pet food and dog chews of animal origin to be exported to the EU to be checked by the CA in accordance with Art.26 in the said Regulation.

Art.26 of Regulation (EC) No 1774/2002 requires that:

- the CA shall at regular intervals carry out inspections and supervision at plants

approved in accordance with the said Regulation;

- the frequency of inspections and supervision shall depend on the size of the plant, the type of products manufactured, risk assessment and guarantees offered in accordance with the principles of the system of HACCP; and
- if the inspection carried out by the CA reveals that one or more of the requirements of the said Regulation are not being met, the CA shall take appropriate action.

5.3.2 Findings

AQSIQ has set up a system of official controls aimed at ensuring compliance with the requirements of the countries importing pet food produced in China (mainly Japan and the United States); for the EU, the system had been enhanced since June 2008 when new requirements and operational standards were introduced to further ensure compliance with requirements of Regulation (EC) No 1774/2002 (Circulars 35 and 78). These new procedures included a more frequent routine of official controls by CIQ staff in pet food plants.

The mission team noted that:

- In most provinces visited CIQ staff were following provisions included in Circular 35 (it entered into force in 2008) on how to perform official inspections on pet food plants approved for exporting to the EU. Representatives from CIQ advised the mission team that before that they had received previous instructions during 2007 from AQSIQ in order to strengthen the supervision of exporting companies. The same representatives explained that since March 2008 there had been training provided both to the companies inspected and to CIQ inspectors responsible for the inspections; the mission team could verify that this had been the case and some of the inspectors met had just attended a training session in February 2009. Besides that, EU legislation had been translated into Chinese and provided to all inspectors responsible for the inspections.
- In all cases a guidance manual and checklists were available for the CIQ inspectors to carry out their tasks; however, in some of the provinces there has been limited training on assessment of HACCP based systems for CIQ staff. Nevertheless, the mission team could verify that most risks are adequately managed and processing of pet food is well ensured in accordance with Regulation (EC) No 1774/2002 (drying, heat treatment or sterilisation, as appropriate).
- Organisation of the controls by CIQ managerial staff was usually based on the local knowledge of the plant, its production throughput and the level of compliance observed over the past years. On average, each plant is inspected four times a year and, in addition, one thorough audit is also carried out on the level of compliance with the conditions of approval laid down in Circular 78. The latter is carried out by a different team of experts following the rationale explained above for the pre-approval checks.
- Official controls were always documented, and recommendations have been provided to the operators in those cases where deficiencies or any minor

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non-compliance had been found. Usually, deadlines given to the operators to fill the gaps found were short and their follow up had been done and it was also well documented.

- Concerning actions taken in case of deficiencies or non-compliance detected during official controls, details provided in 5.1.2 and 5.2.2.3 apply.

5.3.3 Conclusion

1. The CCA have since June 2008 set up a largely effective system of official controls on plants approved to export pet food of animal origin to the EU, which includes: a) regular inspections of those plants during which compliance with Community requirements is verified, b) a frequency of inspections that is decided on a risk-based approach, and c) provisions for taking appropriate action in case Community requirements in that respect are not met. Therefore, in principle, the CCA are in a position to offer guarantees in that regard that can be considered equivalent to the relevant requirements laid down in Artt.18(2)(b) and 26 of Regulation (EC) No 1774/2002 and to so certify in accordance with point II.1 of the health certificates laid down in Chapters 3(A), (B) and (C) of Annex X to the said Regulation.

5.4 HEALTH CERTIFICATION OF PET FOOD OF ANIMAL ORIGIN IMPORTED INTO THE EUROPEAN UNION

5.4.1 Legal requirements

Provisions laid down in Annex VIII (Chapter II, Part C) of Regulation (EC) No 1774/2002 require that Member States must authorise importation of pet food and dog chews of animal origin if they are accompanied by a health certificate that conforms to the model laid down in Chapters 3(A), (B) and (C) of Annex X to the said Regulation as regards, respectively, canned pet food, processed pet food other than canned pet food and dog chews.

Annex X to Regulation (EC) No 1774/2002 requires that the original of the health certificate must be completed and signed by an OV. In doing so, the CCA of the exporting country shall ensure that principles of certification equivalent to those laid down in Directive 96/93/EC are adhered to.

5.4.2 Findings

The mission team noted that:

- Specific staff at the CIQ has been designated as certifying officers; their task is supported by on-the-spot checks carried out both by them and other officials of the CIQ. CIQ officers met in the pet food plants visited had been provided with adequate details on the nature and extent of the enquiries, tests or examinations which should be carried out before consignments can be certified and

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dispatched to the EU. In addition to that, certifying officers have been instructed on the rules to be followed for drawing up and issuing the health certificates that accompany pet food and dog chews of animal origin to be exported to the EU as laid down in Annex X to Regulation (EC) No 1774/2002.

- In the pet food plants visited, enquiries, tests and examinations carried out by CIQ staff before consignments were certified and dispatched to the EU included:
    - Verification that raw materials used had arrived at the pet food plants accompanied by animal health certificates issued by OV of the relevant AHVS responsible for the supplier. This included looking at the records kept by the plant to check whether traceability arrangements in place allow identification of the source and type of those materials used for the production of the consignment to be exported to the EU. However, there are limitations related to the fact that AQSIQ does not verify the reliability of the information that has been ascertained by prior CA along the chain which are not under their control (see 5.2.2.1 for further details) and, therefore, certifying officers are not entirely in a position to knowingly and accurately attest all what they sign in the certificates.
    - Verification that pet food or dog chews had been processed in accordance with the required standards as laid down in point II.3 of the health attestation part of the relevant health certificates. For this, CIQ staff have access to records, log books and data issued by temperature measuring devices available in all the pet food plants visited.
    - Microbiological checks in line with requirements laid down in point II.4 of the health attestation part of the health certificates. The analyses for the detection of *Salmonella* spp. and *Enterobacteriaceae* are carried out in official laboratories using tests that follow international standards for bacteriological examination and documented results were available for all consignments checked by the mission team.
- Aside from the checks carried out at pet food plants on consignments to be exported to the EU, there are CIQ offices at ports and airports which are an additional control layer on them:
    - These offices carry out documentary and identity verifications before they issue a clearance note for the consignment to be handed over to Customs in order to be dispatched; Customs must receive electronically the green light from the CIQ before allowing the consignment to be exported.
    - AQSIQ has instructed staff from these CIQ offices to perform comprehensive cross-checks in a random sample of 0.5% of the consignments, in order to introduce further reassurances in relation to their origin and to the actual correspondence of the accompanying certificate to the goods presented to them for export;
    - All these offices share a computerised system that, for instance, enables them to anticipate the arrival of consignments and to pre-check all information in relation to them. According to staff from the DSAPQ, this system makes

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tampering of veterinary certificates useless as the CIQ office would not receive any information electronically on them and, as a consequence, they would not be in a position to provide Customs with a clearance note for the consignment.

- AQSIQ has taken all necessary steps to ensure the integrity of certification. In particular, CIQ designated certifying officers met had a status which ensures their impartiality and had no direct commercial interest in the products being certified or in the establishments in which they originate.

5.4.3 Conclusions

1. Consignments of pet food of animal origin intended to be exported to the EU are accompanied by health certificates that conforms to the model laid down in Chapters 3(A), (B) and (C) of Annex X to Regulation (EC) No 1774/2002 as regards, respectively, canned pet food, processed pet food other than canned pet food and dog chews, and which are completed and signed by certifying officers designated to do so by the CCA; this is in accordance with provisions laid down in Annex VIII (Chapter II, Part C) and Annex X to Regulation (EC) No 1774/2002.l
2. In principle, the CCA have taken satisfactory steps to ensure that: a) certifying officers have a satisfactory knowledge of Regulation (EC) No 1774/2002 and have been instructed upon as to the rules to be followed for drawing up and issuing the health certificates that accompany pet food and dog chews of animal origin to be exported to the EU; this can be considered equivalent to principles of certification laid down in Art. 3(1) of Directive 96/93/EC; and b) the integrity of certification is equivalent to principles laid down in Art. 4 of the said Directive. However, some of the attestations provided on health certificates are based on data, concerning the type and source of ABP, of which certifying officers have no personal knowledge or whose accuracy they can not verify; this can not be considered equivalent to rules and principles of certification laid down in Art. 3(2 to 4) of Directive 96/93/EC.

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6 OVERALL CONCLUSION

The CCA have taken satisfactory steps to offer guarantees that production of pet food of animal origin imported into the EU from China follows requirements largely equivalent to those laid down in Regulation (EC) No 1774/2002 and, therefore, the requirements set out in the model health certificates laid down in Chapter 3(A), 3(B) and 3(C) of Annex X to Regulation (EC) No 1774/2002 are largely complied with. However, there are certain doubts on the reliability of the attestation on the absence of SRM in the the production of pet food, although these has to be seen in the context of the limited ABP of ruminant origin used for the production of pet food other than dog chews.

The reason of the above deficiency is that the attestation concerning the type and source of ABP used for the production of pet food is made on the basis of data of which certifying officers have not personal knowledge or whose accuracy they can not verify.

Nevertheless, considering the limited used of the concerned material, the system for health certification of pet food of animal origin to be exported to the EU could be considered largely satisfactory.

7 CLOSING MEETING

A closing meeting was held on 27 March 2009 with the representatives of the CCA. At this meeting, main findings and preliminary conclusions of the mission were presented by the inspection team. The CCA did not indicate any major disagreement with these and indicated that actions would be taken to rectify the shortcomings identified, in particular those related to specified risk material and the reliability of the health certification chain. During the meeting additional information as requested by the mission team was provided by the CCA.

8 RECOMMENDATIONS

The competent authorities of the People's Republic of China are invited to provide details of actions taken and planned, including deadlines for their completion, aimed at addressing the recommendations set out below, within 25 working days of receipt of this mission report.

No.	Recommendation
1	To ensure that adequate arrangements are in place that can guarantee that the only ABP that may be used to produce petfood to be exported to the EU are those referred to in part II.2 of the health attestations included in the model health certificates laid down in Chapters 3(A), (B) and (C) of Annex X to Regulation (EC) No 1774/2002; this concerns the requirement that ABP from bovine, ovine and caprine origin do not derive from or contain SRM as defined in Annex V to Regulation (EC) No 999/2001, and that attestations in that respect can be presented in the health certificates in accordance with Annex IX (Chapter D, Section B) to the said Regulation.
2	To ensure that adequate arrangements are in place that can guarantee that attestations provided on health certificates are based on data of which certifying officers have personal knowledge or whose accuracy they can verify when they have been ascertained by other CA along the chain of production of pet food of animal origin to be exported to the EU, in order to adhere to certification rules and principles at least equivalent to those laid down in Art. 3(2) and (4)(a) of Directive 96/93/EC.

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ANNEX 1 - LIST OF LEGISLATION REFERENCED IN THE REPORT

Reference	OJ Ref.	Detail
Regulation (EC) No 1774/2002	OJ L 273, 10.10.2002, p. 1–95	Regulation (EC) No 1774/2002 of the European Parliament and of the Council of 3 October 2002 laying down health rules concerning animal by-products not intended for human consumption
Regulation (EC) No 999/2001	OJ L 147, 31.5.2001, p. 1–40	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
Regulation (EC) No 882/2004	OJ L 165, 30.4.2004, p. 1, Corrected and re-published in OJ L 191, 28.5.2004, p. 1	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
Decision 2007/453/EC	OJ L 172, 30.6.2007, p. 84–86	2007/453/EC: Commission Decision of 29 June 2007 establishing the BSE status of Member States or third countries or regions thereof according to their BSE risk
Directive 96/93/EC	OJ L 13, 16.1.1997, p. 28–30	Council Directive 96/93/EC of 17 December 1996 on the certification of animals and animal products
Directive 97/78/EC	OJ L 24, 30.1.1998, p. 9–30	Council Directive 97/78/EC of 18 December 1997 laying down the principles governing the organisation of veterinary checks on products entering the Community from third countries
Directive 96/22/EC	OJ L 125, 23.5.1996, p. 3–9	Council Directive 96/22/EC of 29 April 1996 concerning the prohibition on the use in stockfarming of certain substances having a hormonal or thyrostatic action and of ß-agonists, and repealing Directives 81/602/EEC, 88/146/EEC and 88/299/EEC

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