Better Training for Safer Food Initiative

Traceability of ABP

Scott Reaney - David Harris
Scope of presentation

• We will look at the tools available to inspectors for monitoring correct traceability of consignments of Animal By-products.

• We will focus on tools to confirm that the details recorded on commercial documents are correct, possible methods for tracing consignments and for detecting illegal activity.
TRACEABILITY

Article 21 of 1069/2009

• ‘Operators consigning, transporting or receiving animal by-products or derived products **shall keep a record of consignments and related commercial documents** or health certificates.’
Commercial Documents

Article 21 of 1069/2009

- ‘Operators shall ensure that animal by-products and derived products are accompanied during transport by a commercial document.’

- ‘Commercial documents.....accompanying animal by-products or derived products during transport shall at least include information on the origin, destination and the quantity of such products, and a description of the animal by-product or derived product and their marking, when such marking is required....’

Commercial Documents

- Origin
- Destination
- Quantity of such products
- Description of the product
- Registered Transporters
Commercial Documents

For intra community trade, model commercial documents are available within the implementing regulation and are generated from within TRACES when the company enters the details of the consignment.
Commercial Documents

Intra-community trade commercial documents must specify:

- the date on which the material was taken from the premises;
- the description of the material
- the quantity of the material, in volume, weight or number of packages;
- the place of dispatch of the material
- the name and the address of the carrier
- the name and the address of the receiver
Commerical Documents

What should we check?

- Document are complete and legible
- The place or origin and place of destination are completed in full and are approved for the activity
- The transporter details are described and the transporter is registered to work with ABPs
- The product details are given in full and represent the consignment
- The weight/volume of material to make sure that it is reasonable (consider storage capacity)
Commercial Documents - Issues

- Incomplete documents
- Documents not showing actual place of destination (traders)
- Documents not signed
- Operators not approved or registered (correctly or at all)
- Description of goods may not match the actual consignment (or other supporting documentation)
Look for the obvious!!!
Supporting Documents

Supporting documents can be useful to **verify** the information presented on the commercial documents.

Examples include:
- **CMR**
- **Shipping documents**
- **Weighbridge documents**
- **Bills of lading**
- **Contact documents**
Supporting Documents

‘Convention relative au contrat de transport international de marchandises par route’

CMR is a document used for road haulage that confirms that the carrier has received the goods and that a contract of carriage exists between the company and the carrier.
Supporting Documents

The CMR will contain:
- The date and location
- The name and address of sender, carrier(s) and consignee
- A description of the goods and their method of packing.
- The weight of the goods.

The details on the CMR should match those on the ABP commercial document.
Supporting Documents

Other examples include:

- Commercial invoices
- Proof of delivery notes
- Weighbridge notes
- Contract documents
Approved / Registered Premises Lists

Article 47 of 1069/2009

- ‘Each Member State shall draw up a list of establishments, plants and operators which have been approved or registered in accordance with this Regulation within its territory.’

- ‘Member States shall make the lists of approved or registered establishments, plants and operators available to the Commission and other Member States.’

- ‘Member States shall keep up-to-date the lists of approved or registered establishments, plants and operators’
Approved / Registered Premises Lists

# Approved / Registered Premises Lists

<table>
<thead>
<tr>
<th>Approval Number</th>
<th>Plant Name</th>
<th>Town</th>
<th>Postcode</th>
<th>Plant Type</th>
<th>ABP Cat</th>
<th>Activity</th>
<th>Product</th>
<th>Associated Activity</th>
</tr>
</thead>
<tbody>
<tr>
<td>01/022/0053 /ABP/Bio</td>
<td>Biogen Greenfinch - Twinwoods</td>
<td>Bedford</td>
<td>MK44 1YU</td>
<td>Biogas Plants</td>
<td>3</td>
<td>BIOGP Biogas Plant</td>
<td>BIOG Biogas</td>
<td>BIOGP Biogas Plant</td>
</tr>
</tbody>
</table>
Approved / Registered Premises Lists

http://ec.europa.eu/food/food/biosafety/establishments/list_abp_e.htm
Approved / registered premises lists

Approved Establishments

Animal byproducts

- Section I: Establishments or plants carrying out intermediate activities and plants storing animal by-products - Category 1
- Section II: Establishments or plants carrying out intermediate activities and plants storing animal by-products - Category 2
- Section III: Establishments or plants carrying out intermediate activities and plants storing animal by-products - Category 3
- Section III: Incineration/ co-incineration/ combustion plants
- Section IV: Processing plants
- Section V: Oleo-chemical plants
- Section VI: Biogas plants
- Section VII: Composting plants
- Section VIII: Petfood plants
- Section IX: Establishments or plants handling animal by-products or derived products for purposes outside the food chain
- Section XI: Registered users of animal by-products and derived product for specific purposes as referred to in Article 17(1) of Regulation (EG) No. 1069/2009
- Section XI: Registered users of animal by-products and derived product for specific purposes as referred to in Article 18(1) of Regulation (EG) No. 1069/2009
- Section XII: Collection centres
- Section XIII: Establishments or plants manufacturing organic fertilisers or soil improvers
- Section XIII: Other registered operators
- Section XIII: Other registered operators - Transporters
- Section XIII: Other registered operators - Traders
- Section XIII: Other registered operators - Storage plants
- Section XIII: Other registered operators - Incineration and co-incineration plants
- Section XIII: Other registered operators - Retailers and users of organic fertilisers and soil improvers
- Section XIII: Other registered operators - Feed business operators
- Section XIII: Other registered operators - Food business operators
## Approved / registered premises lists

### LIST OF APPROVED PLANTS HANDLING ANIMAL BY-PRODUCTS - SECTION IV

**Processing plants**

Article 24(1)(a) of Regulation (EC) No 1069/2009

<table>
<thead>
<tr>
<th>No.</th>
<th>Approval Number</th>
<th>Name of the establishment</th>
<th>Town Region</th>
<th>Category</th>
<th>Activities Product Types</th>
<th>Associated Activities</th>
<th>Remarks</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>NL 06801</td>
<td>Noblesse Proteins BV</td>
<td>Ambachtsweg 7 9418 TW WIJSTER</td>
<td>cat 3</td>
<td>PROC PAP</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>NL 06801</td>
<td>Noblesse Proteins BV</td>
<td>Ambachtsweg 7 9418 TW WIJSTER</td>
<td>cat 3</td>
<td>PROC HYDP</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>NL 08415</td>
<td>Twilmij B.V.</td>
<td>Houtbeekweg 4 3776LZ STROE</td>
<td>cat 3</td>
<td>PROC MIMC</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>NL 1061</td>
<td>Sonac Son B.V.</td>
<td>Kanaaldijk Noord 20 21 5691NM SON</td>
<td>cat 3</td>
<td>PROC HYDP</td>
<td></td>
<td></td>
</tr>
<tr>
<td>5</td>
<td>NL 1061</td>
<td>Sonac Son B.V.</td>
<td>Kanaaldijk Noord 20 21 5691NM SON</td>
<td>cat 3</td>
<td>PROC PAP</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6</td>
<td>NL 20347</td>
<td>Weko Eiproducten</td>
<td>Bonegraafseweg 15</td>
<td>cat 3</td>
<td>PROC EGG</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Approved / registered premises lists

Search facilities
- Section number
- Approval number
- Plant name
- Activity
Staining

- Main traceability measure for SRM in TSE regs is requirement to stain with a dye as soon as removed.
- Aim is to prevent re-entry into food chain or being dispatched as cat 2/3.
- 0.5% weight/volume solution of the colouring agent Patent Blue V.
- Checks needed at rendering and slaughterhouse.
Staining - Issues

- Insufficient or inconsistent staining
- Verification checks at processing plant
- Can be difficult for inspectors to check staining quality
- Need to have good liaison between slaughterhouse and processing site at an operator and inspector level
Testing Options - GTH

EC142/2011 Annex VIII Ch IV

‘In processing plants for the processing of Category 1 or Category 2 material, derived products shall be permanently marked with glycerol triheptanoate (GTH)’

‘all DP contain homogenously throughout the substance a minimum concentration of at least 250 mg GTH per kg fat’
Testing Options - GTH

- GTH has a low toxic profile, is commercially available at a low cost, has good stability at rendering conditions and is not found in nature.
- Detected by GC-MS
- Testing can be expensive but could be considered to target investigations
Testing Options - PCR

Species specific PCR methods for detecting DNA from processed material

Not prescribed in the ABP regulation but a useful tool for targeted investigations where it is suspected that ruminant material has been included in non-ruminant PAP
Potential Issues With Testing

• Testing for GTH or PCR can be expensive
• Representative sampling of bulk loads
• Identifying optimal sampling point within the movement chain
• Test sensitivity issues
• Test validation
Commercial cargo tracking websites can be useful for monitoring movements of ABP.

http://www.track-trace.com/
Tracking websites

http://www.shipmentlink.com/servlet/TDB1_CargoTracking.do
Tracking Websites - limitations

- Limited to in-transit goods only – no retrospective check
- Some sites give better detail than others
- Some containers are difficult to track
- Takes time to track containers – daily checks
'in the case of meat-and-bone meal derived from Category 2 material and processed animal proteins intended to be used as or in organic fertilisers and soil improvers, they have been mixed with a component to exclude the subsequent use of the mixture for feeding purposes'
OF/SI – Authorised component - limitations

No single authorised component for use across all member states

Examples:
- inorganic fertiliser
- wood shavings
- limestone chips

The Joint Research Centre has been asked to investigate suitable mixing components
Labelling & Colour

During transport and storage, a label attached to the packaging, container or vehicle which must:

• clearly indicate the category of the material
• visibly show the following words given in 142/2011 Annex VIII chII
Labelling & Colour

Examples of labelling requirements from Annex VIII chII:

- Cat 3 material - ‘not for human consumption’
- Cat 2 material (other than manure and digestive tract content) and derived products from Category 2 material - ‘not for animal consumption’;
- Cat 1 material and derived products from Category 1 material where they are destined for disposal - ‘for disposal only’
- Organic fertilisers and soil improvers, ‘organic fertilisers or soil improvers/no grazing of farmed animals or use of crops as herbage during at least 21 days following application’
Labelling & Colour

Where ABPs and derived products are dispatched from one Member State to another Member State, **the packaging, containers or vehicles** must be prominently and, at least for the period of transport, indelibly colour-coded or have a **colour coded label**.
Labelling & Colour

- Cat 1 materials - **black**
- Cat 2 materials (other than manure and digestive tract content) - **yellow**
- Cat 3 materials - **green** (with a high content of blue to ensure that it is clearly distinguishable from the other colours)
EC1069/2009 Article 48

‘The competent authority of the Member State of origin shall inform the competent authority of the Member State of destination, by means of the Traces system ..... of the dispatch of each consignment sent to the Member State of destination, of

(a) Cat 1 & 2 material and MBM or animal fat derived from cat 1 and 2 material;
(b) PAP derived from Category 3 material’
EC1069/2009 Article 48

‘When informed of the dispatch, the competent authority of the Member State of destination shall inform the competent authority of the Member State of origin of the arrival of each consignment by means of the Traces system’
TRACES
**Details of Consignment Presented: References**

<table>
<thead>
<tr>
<th>Description</th>
<th>Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.2. Certificate reference number</td>
<td>DOCOM.GB.2015.0001062</td>
</tr>
<tr>
<td>1.2.a. Local reference number</td>
<td>24026</td>
</tr>
</tbody>
</table>

**Details of Consignment Presented: Competent Authorities**

<table>
<thead>
<tr>
<th>Description</th>
<th>Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.4. Local Competent Authority</td>
<td>GB02401 Lincolnshire</td>
</tr>
<tr>
<td>1.2. Central Competent Authority</td>
<td>GB00000 Department of Environment, Food And Rural Af, C</td>
</tr>
</tbody>
</table>

**Identification of Applicant**

<table>
<thead>
<tr>
<th>Description</th>
<th>Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name</td>
<td>Allison Evans</td>
</tr>
<tr>
<td>Date of Declaration</td>
<td>06/02/2015 (UTC +0000)</td>
</tr>
</tbody>
</table>

**Attachments**

<table>
<thead>
<tr>
<th>File</th>
<th>Size</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Add**
### TRACES

**Details of Consignment Presented: Traders**

<table>
<thead>
<tr>
<th>Name</th>
<th>Address</th>
<th>Postal Code / Region</th>
<th>Country</th>
</tr>
</thead>
<tbody>
<tr>
<td>J O Pears (Newark) Limited</td>
<td>Site A, Low Marsham, Newark, NG23 5SL</td>
<td>NG23 Newark</td>
<td>GB United Kingdom</td>
</tr>
<tr>
<td>Gepro Geflügel-Protein Vertriebsgesellschaft mbH &amp; Co. KG</td>
<td>Im Moore 1, 49356 Diepholz, Stadt</td>
<td></td>
<td>DE Germany</td>
</tr>
</tbody>
</table>

**Place of origin / Place of harvest**

<table>
<thead>
<tr>
<th>Name</th>
<th>Establishment</th>
<th>Approval number</th>
<th>Address</th>
<th>Postal Code / Region</th>
<th>Country</th>
</tr>
</thead>
<tbody>
<tr>
<td>J O Pears (Newark) Limited</td>
<td></td>
<td>3207180031ABPREN</td>
<td>Site A, Low Marsham, Newark, NG23 5SL</td>
<td>NG23 Newark</td>
<td>GB United Kingdom</td>
</tr>
<tr>
<td>GePro Geflügel-Protein Vertriebsgesellschaft mbH &amp; Co. KG</td>
<td></td>
<td>DE 04 01 0005 04</td>
<td>Getreidestraße 8</td>
<td></td>
<td>DE Germany</td>
</tr>
</tbody>
</table>

**Place of destination**

<table>
<thead>
<tr>
<th>Name</th>
<th>Establishment</th>
<th>Approval number</th>
<th>Address</th>
<th>Postal Code / Region</th>
<th>Country</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gepro Geflügel-Protein Vertriebsgesellschaft mbH &amp; Co. KG</td>
<td></td>
<td>DE 04 01 0005 04</td>
<td>Getreidestraße 8</td>
<td></td>
<td>DE Germany</td>
</tr>
</tbody>
</table>

**Dealer**

<table>
<thead>
<tr>
<th>Name</th>
<th>Approval number</th>
</tr>
</thead>
</table>

---

TRACES is the Trade Control and Expert System (TRACES) of the European Commission, providing a digital platform for the traceability of goods, especially in the fields of Agriculture and Food.
### List of Controls

<table>
<thead>
<tr>
<th>Date of Control</th>
<th>Name</th>
<th>Local Veterinary Unit</th>
<th>Place of Control</th>
</tr>
</thead>
<tbody>
<tr>
<td>12/02/2015 (UTC +0000)</td>
<td>Elisabeth Oltmann</td>
<td>DE06904 Bremen</td>
<td>Other</td>
</tr>
</tbody>
</table>

- Open
TRACES - Issues

- Can be time consuming and a poor use of resources to inform/control arrival of each consignment
- Requires good communication between Member States
- Low number of ‘controls’ applied across Member states to confirm receipt of consignments
This presentation has been loaded without the Shakespeak add-in. Want to download the add-in for free? Go to http://shakespeak.com/en/free-download/.
Which of the following testing options could be used to detect category 1 MBM:

- Salmonella detection
- Enterobacteriaceae detection
- GTH detection
- Parvovirus detection

The question will open when you start your session and slideshow.

# votes: 0  Closed
Which of the following testing options could be used to detect category 1 MBM:

- Salmonella detection
- Enterobacteriaceae detection
- GTH detection
- Parvovirus detection
Link to Premises lists

http://ec.europa.eu/food/food/biosafety/establishments/list_abp_en.htm
Better Training for Safer Food

BTSF

European Commission
Consumers, Health, Agriculture  and Food Executive Agency
DRB A3/042
L-2920 Luxembourg