

PLEASE NOTE REVISED CHAPTER:

PART TWO

11. TRACEABILITY, IDENTIFICATION AND HEALTH MARKING

| Section | Page |
|--|----------------------------------|
| 11. Contents | 1 |
| 11.1 Why is traceability important? | 2 |
| 11.2 What are the legal requirements for traceability? | |
| 11.2.1 Which operations does the law apply to? | 3 |
| 11.2.2 What are the operator's legal obligations? | 3 |
| A. Traceability & Recall | |
| B. Identification Marking | |
| C. Health Marking | |
| 11.2.3 What are the official control requirements? | 6 |
| 11.3 How may operators demonstrate compliance? | 8 |
| 11.3.1 Traceability} | <i>to be covered by separate</i> |
| 11.3.2 Recall procedures} | <i>FSA consultation</i> |
| 11.3.3 Identification marking | |
| 11.3.4 Health marking | |
| 11.3.5 Maintaining and monitoring of traceability procedures | |

11.1.1 WHY IS TRACEABILITY IMPORTANT?

Information about suppliers and customers means that if a food safety emergency occurs, the food can be traced backwards or forwards through the food chain. This information can be used to withdraw or recall food more quickly from the market and to target these actions to specific products. Emergencies may be due to concerns over microbiological contamination (e.g. E.coli O157), chemical contamination (e.g. veterinary medicines, dioxins) or physical contamination (e.g. glass) of the product, or if unfit meat has been released on to the market.

The application of a health mark or identification mark to products of animal origin, including meat, is an important part of the traceability system.

The health mark indicates that red meat carcasses and wholesale cuts have been subject to ante and post-mortem inspection and have not been found unfit for human consumption at the time of inspection. The identification mark, applied by the food business operator, indicates that white meat, all cut meat and processed meat has been produced in accordance with the legal requirements.

11.2 WHAT ARE THE LEGAL REQUIREMENTS FOR TRACEABILITY?**11.2.1 WHICH OPERATIONS DOES THE LAW APPLY TO?**

| <i>Operations</i> | <i>Relevant Sections of 11.2.2 below</i> |
|--|--|
| Red Meat Slaughter | A, C (health marking) |
| White Meat Slaughter | A, B |
| Approved Farm Slaughter | A |
| Farmed Game Handling except lagomorphs | A, C (health marking) |
| Farmed Game Handling Lagomorphs | A, B |
| Large Wild Game Handling | A, C (health marking) |
| Small Wild Game Handling | A, B |
| Meat Cutting and Production of Meat Products, Mince Meat, Meat Preparations and MSM | A, B |
| Edible By Products | A, B |

11.2.2 WHAT ARE THE OPERATOR'S LEGAL OBLIGATIONS?**A. TRACEABILITY**

1. Food business operators (FBOs) must, in accordance with Article 18 of Regulation 178/2002, have in place systems and procedures to identify FBOs from whom they have received and to whom they have delivered products of animal origin.

853/2004 Annex II Identification Marking: Section I point A4

2. Food ... business operators shall be able to identify any person from whom they have been supplied with a food, a feed, a food-producing animal, or any substance intended to be, or expected to be, incorporated into a food To this end, such operators shall have in place systems and procedures which allow for this information to be made available to the competent authorities on demand.
3. Food ... business operators shall have in place systems and procedures to identify the other businesses to which their products have been supplied. This information shall be made available to the competent authorities on demand.
4. Food ... which is placed on the market or is likely to be placed on the market in the

Community shall be adequately labelled or identified to facilitate its traceability, through relevant documentation or information in accordance with ... more specific provisions.

General Food Law Regulation 178/2002 Article 18

B. IDENTIFICATION MARKING

1. Food business operators shall not place on the market a product of animal origin handled in an establishment subject to approval ... unless it has either (a) a health mark applied in accordance with Regulation (EC) No 854/2004... or (b) when that regulation does not provide for the application of a health mark, an identification mark applied in accordance with Annex II Section I of 853/2004.
2. Food business operators may apply an identification mark to a product of animal origin only if the product has been manufactured in accordance with 853/2004 in establishments meeting the requirements of Article 4 (Approval & Registration).

853/2004 Article 5: points 1 and 2

... food business operators must ensure that products of animal origin (POAO) have an identification mark applied in compliance with the following provisions:

3. The identification mark must be applied before the product leaves the establishment.
4. However, a new mark need not be applied to a product unless its packaging and/or wrapping is removed or it is further processed in another establishment, in which case the new mark must indicate the approval number of the establishment where these operations take place.
5. The mark must be legible and indelible, and the characters easily decipherable. It must be clearly displayed for the competent authorities.
6. The mark must indicate the name of the country in which the establishment is located, which may be written out in full or shown as a two-letter code in accordance with the relevant ISO standard. For the United Kingdom, the code letters are UK.
7. The mark must indicate the approval number of the establishment. If an establishment manufactures both food to which this Regulation applies and food to which it does not, the ... operator may apply the same identification mark to both types of food.
8. When applied in an establishment located within the Community, the mark must be oval in shape and include the abbreviation CE, EC, EF, EG, EK or EY.

9. The mark may, depending on the presentation of different POAO, be applied directly to the product, the wrapping or the packaging, or be printed on a label affixed to the product, the wrapping or the packaging. The mark may also be an irremovable tag made of a resistant material.
10. In the case of packaging containing cut meat or offal, the mark must be applied to a label fixed to the packaging, or printed on the packaging, in such a way that it is destroyed when the packaging is opened. This is not necessary, however, if the process of opening destroys the packaging. When wrapping provides the same protection as packaging, the label may be affixed to the wrapping.
11. For POAO that are placed in transport containers or large packages and are intended for further handling, processing, wrapping or packaging in another establishment, the mark may be applied to the external surface of the container or packaging.
12. When POAO are placed in a package destined for direct supply to the final consumer, it is sufficient to apply the mark to the exterior of that package only.
13. When the mark is applied directly to POAO, the colours used must be authorised in accordance with Community rules on the use of colouring substances in foodstuffs.

Regulation 853/2004 Annex II Section I: points A, B and C.

C. HEALTH MARKING

1. Food business operators shall not place on the market a product of animal origin handled in an establishment subject to approval ... unless it has either (a) a health mark applied in accordance with Regulation (EC) No 854/2004... or (b) when that regulation does not provide for the application of a health mark, an identification mark
2. Food business operators may not remove a health mark applied in accordance with Regulation (EC) No 854/2004 from meat unless they cut or process it or work upon it in another manner.

853/2004 Article 5: points 1 and 3

3. Food ... operators may not place meat from animals having undergone emergency slaughter on the market unless it bears a special health mark, which cannot be confused either with the health mark ... or with the identification mark... . Such meat may be placed on the market only in the Member State where slaughter takes place

*853/2004 Annex III **Emergency Slaughter**: Section I Chapter VI point 9*

11.2.3 WHAT ARE THE OFFICIAL CONTROL REQUIREMENTS?

- 1 The competent authority shall give each approved establishment, including those with conditional approval, an approval number, to which codes may be added to indicate the types of products of animal origin manufactured. For wholesale markets, secondary numbers indicating units or groups of units selling or manufacturing products of animal origin may be added to the approval number.

854/2004 Article 3: point 3

- 2 Verification of compliance with the requirements of Regulation (EC) No 853/2004 concerning the application of identification marks shall take place in all establishments approved in accordance with that Regulation, in addition to verification of compliance with other traceability requirements.

854/2004 Article 4: point 6

- *Health mark' means a mark indicating that, when it was applied, official controls had been carried out in accordance with Regulation 854/2004.*

854/2004 Article 2 Definitions: point 1

- 3 The health marking of carcasses of domestic ungulates, farmed game mammals other than lagomorphs, and large wild game, as well as half-carcasses, quarters and cuts produced by cutting half-carcasses into three wholesale cuts, shall be carried out in slaughterhouses and game-handling establishments. In accordance with Section I, Chapter III of Annex I.
- 4 Health marks shall be applied by, or under the responsibility of, the official veterinarian when official controls have not identified any deficiencies that would make the meat unfit for human consumption.

854/2004 Article 5: point 2

5. The official veterinarian is to supervise health marking and the marks used.
6. The official veterinarian is to ensure, in particular, that:
 - (a) the health mark is applied only to animals (domestic ungulates, farmed game mammals other than lagomorphs, and large wild game) having undergone ante-mortem and post-mortem inspection in accordance with this Regulation and when there are no grounds for declaring the meat unfit for human consumption.
 - (b) However, the health mark may be applied before the results of any examination for trichinosis is available, if the official veterinarian is satisfied that meat from the

animal concerned will be placed on the market only if the results are satisfactory; &
 (c) Health-marking takes place on the external surface of the carcass, by stamping the mark in ink or hot branding, and in such a manner that, if carcasses are cut into half carcasses or quarters, or half carcasses are cut into three pieces, each piece bears a health mark.

7. The health mark must be an oval mark at least 6.5 cm wide by 4.5 cm high bearing the following information in perfectly legible characters:
 - (a) The mark must indicate name of the country in which the establishment is located, which may be written out in full in capitals or shown as a two-letter code in accordance with the relevant ISO standard. In the United Kingdom, the code is UK;
 - (b) The mark must indicate the approval number of the slaughterhouse; and
 - (c) when applied in a slaughterhouse within the Community, the mark must include the abbreviation CE, EC, EF, EG, EK or EY.
8. Letters must be at least 0,8 cm high and figures at least 1 cm high. The dimensions and characters of the mark may be reduced for health marking of lamb, kids and piglets.
9. The colours used for health marking must be authorised in accordance with Community rules on the use of colouring substances in foodstuffs.
10. The health mark may also include an indication of the official veterinarian who carried out the health inspection of the meat.
11. Competent authorities and food business operators may continue to use equipment that they ordered before entry into force of this Regulation until it is exhausted or requires replacement.
12. Meat from animals having undergone emergency slaughter outside the slaughterhouse must bear a special health mark, which cannot be confused either with the health mark ... or with the identification mark.
13. Meat from unskinned wild game cannot bear a health mark unless, after skinning in a game handling establishment, it has undergone post-mortem inspection and been declared fit for human consumption.
14. This Chapter is to apply without prejudice to animal health rules on health marking.

854/2004 Annex I **Health Marking:** Section I Chapter III

11.3 HOW MAY OPERATORS DEMONSTRATE COMPLIANCE?

Food Business Operators may demonstrate compliance with their legal obligations on an ongoing basis by providing evidence, including appropriate documentation, that:

- Procedures exist to maintain traceability effectively by:
 - Using a registration or approval number given by the Competent Authority as part of the health or identification mark.
 - Applying an identification mark to meat that is not required to be health marked.
 - Being able to supply customer/supplier details when required.
- Arrangements exist to maintain and monitor company procedures and take corrective action if there is a failure.

GUIDE TO COMPLIANCE

ADVICE FOR OPERATORS

11.3.1 TRACEABILITY

11.3.2 WITHDRAWAL AND RECALL OF PRODUCT

Note: Guidance on the traceability, withdrawal and recall requirements of Regulation 178/2004 will be the subject of a separate FSA consultation.

11.3.3 IDENTIFICATION MARKING

| GUIDE TO COMPLIANCE | ADVICE FOR OPERATORS |
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| <i>Training and instruction</i> | <i>Training and instruction</i> |
| <ul style="list-style-type: none"> Food business operators ensure that food handlers are supervised and instructed and/or trained in food hygiene matters commensurate with their work activity. <p>852/2004 Annex II Chapter XII: point 1</p> | <p><i>Instruct staff about the need to apply identification marks correctly and report problems promptly. Supervise as appropriate and issue reminders if lapses occur. See also Chapter 6 (Training).</i></p> <p><i>Keep accurate, dated records to show what instruction/training individuals have received.</i></p> |
| <i>Relevant products</i> | <i>Relevant products</i> |
| <ul style="list-style-type: none"> All products of animal origin (POAO) have identification markings applied before being placed on the market, except those that are health marked (see 11.3.4 below). <p>B1, C1</p> <ul style="list-style-type: none"> Slaughtered poultry transported to approved premises are accompanied by a declaration and veterinary certificate. <p>853/2004 Annex III Section II Chapter VI points 6 and 7</p> <ul style="list-style-type: none"> The mark includes the establishment's approval number. If an establishment manufactures both food to which Regulation 853/2004 applies i.e. products | <p><i>Products of animal origin require identification marks except carcasses or wholesale cuts of red meat species, farmed game mammals (other than lagomorphs) and large wild game that are health marked.</i></p> <p><i>Uneviscerated poultry carcasses moving between the farm and approved premises may be unmarked but have to be accompanied by a declaration and veterinary certificate. [See x for details of the declaration.]</i></p> <p><i>Products that are not required to be id. marked (e.g. foods such as pizzas with salami that are made from products of plant origin combined with processed products of animal origin), made in the</i></p> |

| GUIDE TO COMPLIANCE | ADVICE FOR OPERATORS |
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| <p>of animal origin and food to which it does not, the same identification mark can be applied to both types of food.</p> <p>B7</p> | <p><i>same premises as products of animal origin (e.g. salami) that are required to be marked, may also be id. marked.</i></p> |
| <p>Shape & Contents</p> <ul style="list-style-type: none"> The identification mark is legible and indelible, and the characters are easily decipherable. <p>B5</p> <ul style="list-style-type: none"> The mark is oval and contains the name or code of the Member State in which the establishment of production is located, the approval or registration number (see below) includes the abbreviation EC. <p>B7, B8</p> | <p>Shape & Contents</p> <p><i>There is no size requirement but the size of the health mark may be a guide (see 11.3.4). The id. mark may be illegible if the writing is too small or the surface it is used on is crumpled or wet.</i></p> <p><i>The country name may be written out in full in capitals or shown as a two-letter code i.e. UK.</i></p> |
| <p>New Marks</p> <ul style="list-style-type: none"> If a product has its packaging and/or wrapping removed or it is further processed in another establishment, a new mark shows the approval number of the establishment where these operations take place. Otherwise a new mark need not be applied. <p>B4</p> | <p>New Marks</p> <p><i>If the meat is re-wrapped or re-packaged or re-processed in some way the identification mark of the re-processing establishment is displayed/carried.</i></p> <p><i>See removal of health marks at 11.3.4 below.</i></p> |
| <p>Method of Display</p> <ul style="list-style-type: none"> The mark is clearly displayed for the competent authorities. <p>B5</p> <ul style="list-style-type: none"> Depending on the presentation of the product the identification mark is either: <ul style="list-style-type: none"> Stamped directly on the product, the | <p>Method of Display</p> <p><i>Failure of automatic labelling equipment may lead to damaged labels and unclear identification marks.</i></p> |

MAYOS WORKING DRAFT I

| GUIDE TO COMPLIANCE | ADVICE FOR OPERATORS |
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| <p>wrapping or the packaging; or</p> <ul style="list-style-type: none"> Printed on a label fixed to the product, the wrapping or the packaging; or An irremovable tag made of resistant material. <p>B9</p> | <p><i>Use of tags may create a physical hazard, particularly where meat is to be used in further processing.</i></p> |
| Application direct to meat | Application direct to meat |
| <ul style="list-style-type: none"> Authorised colours are used where the identification mark is applied direct to meat. <p>B13</p> | <p><i>Recommended food grade colours are Chocolate Brown HT, Brilliant Blue and Allura Red. See the Colour in Food Regulations 1995 (SI 3124).</i></p> |
| Wrapped/package cut meat & offal | Wrapped/package cut meat & offal |
| <ul style="list-style-type: none"> In the case of packaging containing cut meat or offal, the id. Mark is applied to a label fixed to the packaging, or printed on the packaging, in such a way that it is destroyed when the packaging is opened, unless the process of opening destroys the packaging. When wrapping provides the same protection as packaging, the label may be fixed to the wrapping. <p>B10</p> | <p><i>Marks will be destroyed if, for example, the label is placed on the join of a box lid that is cut when the box is opened.</i></p> |
| Bulk loads for further handling | Bulk loads for further handling |
| <ul style="list-style-type: none"> For POAO placed in transport containers or large packages and intended for further handling, processing, wrapping or packaging in another establishment, the mark can be applied to the external surface of the container or packaging. <p>B11</p> | |
| Direct Supply to Final Consumers | Direct Supply to Final Consumers |

GUIDE TO COMPLIANCE

ADVICE FOR OPERATORS

- For POAO placed in a package destined for direct supply to the final consumer, it is sufficient to apply the mark to the exterior of that package only.

B12

A final consumer is the ultimate consumer of foodstuff who will not use the food as part of any business or activity.

11.3.4 HEALTH MARKING

Note: Health marking is an official control applied under OV supervision

| GUIDE TO COMPLIANCE | ADVICE FOR OPERATORS |
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| Relevant Products | Relevant Products |
| <ul style="list-style-type: none"> All carcasses, half carcasses, quarter and wholesale cuts of domestic ungulates (cattle, sheep, goats, pigs and horses), farmed game mammals (other than rabbits, hares and rodents), and large wild game, are health marked having undergone inspection and not found unfit for human consumption at the time of post-mortem inspection in slaughterhouses and game handling establishments under OV supervision. <p>11.2.3 Official Controls points 3, 4, 5, 6a, 13</p> | <p><i>Meat that has not been passed fit for human consumption must not be health marked and must be disposed of as animal by-product under the Animal by-products (Identification) Regulations 1995 as amended and the Animal by-product (Identification) Regulation (Northern Ireland) 1999 as amended. See Chapter x (Animal by products).</i></p> |
| Removal of Health Marks | Removal of Health Marks |
| <ul style="list-style-type: none"> Health marks are not removed from meat unless operators cut or process it or work upon it in another manner. <p>C2</p> | <p><i>See 'New Marks' at 11.3.3 above</i></p> |
| Shape, Size & Contents | Shape, Size & Contents |
| <ul style="list-style-type: none"> The mark is oval, at least 6.5 cm wide by 4.5 cm high, with letters at least 0.8 cm high and figures at least 1 cm high. A | <p><i>Health marks may be illegible if the carcass surface is damp.</i></p> <p><i>The size of health marks may be reduced but must</i></p> |

| GUIDE TO COMPLIANCE | ADVICE FOR OPERATORS |
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| <p>smaller mark may be used for health marking of lamb, kids and piglets.</p> <ul style="list-style-type: none"> The health mark's characters are perfectly legible and bear the following information: <ul style="list-style-type: none"> The name or code of the Member State in which the establishment is located, The approval number and EC to show the meat is of EU origin. <p>11.2.3 Official Controls points 7, 8</p> <ul style="list-style-type: none"> The health mark is applied either by use of indelible EU authorised ink or by hot branding. <p>11.2.3 Official Controls points 6c, 9</p> <ul style="list-style-type: none"> The mark may also include an indication of the OV who carried out the inspection of the meat. <p>11.2.3 Official Controls point 10</p> | <p><i>not be so small they are illegible.</i></p> <p><i>The country name may be written out in full in capitals or shown as a two-letter code i.e. UK</i></p> <p><i>EU/EC - see 'Transitional Arrangements' below.</i></p> <p><i>Recommended food grade colours are Chocolate Brown HT, Brilliant Blue and Allura Red. See the Colours in Food Regulations 1995 (SI 1995/3124).</i></p> |
| Number of health marks | Number of health marks |
| <ul style="list-style-type: none"> The external surface of carcasses is health marked by stamping in such a way that, if they are cut into half carcasses or quarters, or half carcasses are cut into three pieces, each piece bears a health mark. <p>11.2.3 Official Controls point 6c</p> | <p><i>Up to six marks may be required. Only one health mark need be applied to each side of carcasses that are to go direct from the slaughterhouse to a co-located cutting room, provided that the OV is satisfied with the controls over the unstamped meat.</i></p> |
| Marking of Trichinellosis-tested animals | Marking of Trichinellosis-tested animals |
| <ul style="list-style-type: none"> The health mark may be applied before the results of any examination for trichinosis is available, if the official veterinarian is satisfied that meat from the animal concerned will only be placed on | <p><i>For health marks to be applied before trichinella test results are available there is a written procedure that ensures that tested carcasses remain identifiable and under control until negative results have been obtained. Appropriate disposal</i></p> |

| GUIDE TO COMPLIANCE | ADVICE FOR OPERATORS |
|--|---|
| the market if the results are satisfactory. 11.2.3 Official Controls point 6b | <i>arrangements are made for carcasses with positive results.</i> |
| Emergency slaughtered animals | Emergency slaughtered animals |
| <ul style="list-style-type: none"> Meat from animals that have undergone emergency slaughter outside the slaughterhouse bear a special health mark that cannot be confused with other health or identification marks . C3, 11.2.3 Official Controls point 12 | <p>A square health mark of 5.5 cm by 5.5 cm containing letters of 0.8 cm high and figures of 1 cm high will be applied with, in the upper part the letters 'UK', in the centre the approval number of the premises, and in the lower part the letter 'N'.</p> |
| Transitional Arrangements | Transitional Arrangements |
| <ul style="list-style-type: none"> Equipment ordered before 1 January 2006 may be used until it is exhausted or requires replacement. 11.2.3 Official Controls point 11 [Note: National marks may continue to be used in premises licensed before 1 January 2006 in the period up to re-approval.] [expected in Transitional Measures xx/2005] | <p>Stamps marked EEC may continue to be used until replaced and labels until stock run out.</p> <p>From 1.1.2006, the oval mark will replace the square health mark in approved premises previously restricted to the national market and the pentagonal health mark will no longer be applied to wild game meat. Square health marks will be used for meat from animals that have undergone emergency slaughter.</p> |

11.3.5 MAINTAINING AND MONITORING OF OPERATOR PROCEDURES

| GUIDE TO COMPLIANCE | ADVICE FOR OPERATORS |
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| Operator Responsibilities | Operator Responsibilities |
| <ul style="list-style-type: none"> The operator is responsible for food safety in the food business. 852/2004 Article 1 point 1a | <p>Operator Responsibility includes maintaining and monitoring the company's procedures and taking corrective action if there is a failure.</p> <p>Delegation – responsibility for the company's procedures and its monitoring may be delegated to a nominated person to whom problems are reported, and who has sufficient authority to ensure that corrective action is taken when</p> |

necessary.

Monitoring – there should be regular checks that company procedures are being applied, problems are reported.

Frequency of monitoring - this will depend on the likelihood of a problem being found. Once a month may be sufficient for premises with experienced staff and where procedures are unchanged. The work of new or temporary people who are less familiar with the procedures may need to be monitored more frequently.

Records – keep an accurate, dated account of the date and result of each periodic monitoring check and of any corrective action taken.

Corrective action – take action when there is evidence of failures. Such action may include:

- Dealing with poorly / incorrectly marked / unmarked product;
- Improving customer/supplier records;
- Establishing the underlying cause and what needs to be done to prevent similar incidents in the future; and
- Improving staff instructions and training.