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HEALTH & CONSUMERS DIRECTORATE-GENERAL

Directorate F - Food and Veterinary Office

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FINAL REPORT OF A MISSION CARRIED OUT IN THAILAND FROM 16 FEBRUARY TO 27 FEBRUARY 2009 IN ORDER TO EVALUATE THE FOOD SAFETY CONTROL SYSTEMS IN PLACE GOVERNING THE PRODUCTION OF POULTRY MEAT AND POULTRY MEAT PRODUCTS INTENDED FOR EXPORT TO THE EUROPEAN UNION

In response to information provided by the Competent Authority, any factual error noted in the draft report has been corrected;any clarification appears in the form of an endnote.

Executive Summary

This report describes the outcome of an inspection mission carried out by the Food and Veterinary Office in Thailand from 16 to 27 February 2009.

The objective of the mission was to assess the performance of the competent authority with regard to the implementation of food safety control systems governing the production of poultry meat products destined for export to the EU.

The report concludes that there is a well organised and documented official control system in place and that the production conditions are generally satisfactory. Overall, the system is capable of guaranteeing standards equivalent to those required by Community legislation. However, the effectiveness of the control system is compromised by deficiencies regarding microbiological analyses, post-mortem inspection and the conditions observed in some establishments.

The report includes a number of recommendations addressed to the Thai competent authority and aimed at rectifying the identified deficiencies.

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ABBREVIATIONS & SPECIAL TERMS USED IN THE REPORT

Abbreviation	Explanation
AI	Avian Influenza
BLSC	Bureau of Livestock Standards & Certification
BQCLP	Bureau of Quality Control and Livestock Products
CA	Competent Authority
DG	Directorate General
DLD	Department of Livestock Development
EC	European Community
EU	European Union
FVO	Food and Veterinary Office
HACCP	Hazard Analysis and Critical Control Points
MI/s	Meat Inspector/s
MT	Mission Team
OV/s	Official Veterinarian/s
PM	Poultry Meat
PM&PMPIR	Poultry Meat and Poultry Meat Products Inspection Regulations B.E. 2548
PMP	Poultry Meat Products
RASFF	Rapid Alert System for Food and Feed
SANCO	Directorate General for Health and Consumers
VPHL	Veterinary Public Health Laboratory

1 INTRODUCTION

The mission took place in Thailand from 16 to 27 February 2009 and was undertaken as part of the Food and Veterinary Office's (FVO) planned mission programme.

The mission team (MT) comprised two inspectors from the FVO.

2 OBJECTIVES OF THE MISSION

The objective of the current mission was:

- to assess the performance of the Thai Competent Authority (CA) with regard to the implementation of the food safety control systems governing the production of poultry meat products (PMP) destined for export to the European Union (EU).

In pursuit of this objective, the MT proceeded as follows:

- an opening meeting was held on 16 February 2009 with the CA. At this meeting the MT confirmed the objective of and itinerary for the mission, and requested additional information required for the satisfactory completion of the mission;
- the following sites were visited:

Competent authority visits		**Comments**
Central CA	1	
Laboratory visits		
Veterinary Public Health Laboratory of Bureau of Quality Control and Livestock Products	1	
Primary production		
Broiler farms	2	
Food processing facilities		
Combined poultry meat and poultry meat product establishments	9	5 have slaughtering, 6 meat cutting and 8 meat product production activities

- representatives from the CA accompanied the MT during the whole mission.

3 LEGAL BASIS FOR THE MISSION

The mission was carried out in agreement with the Thai Authorities and under the general provisions of Community legislation and, in particular:

- Article 46 of Regulation (EC) No 882/2004 of the European Parliament and of the Council of 29 April 2004 on official controls in third countries performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules;
- Commission Decision 98/140/EC of 4 February 1998 laying down certain detailed rules concerning on-the-spot checks carried out in the veterinary field by Commission experts in third countries.

Full legal references are provided in Annex 1. Legal acts quoted in this report refer, where applicable, to the last amended version.

4 BACKGROUND

4.1 HISTORICAL BACKGROUND

A previous mission (DG(SANCO)/7554/2005) took place in 2005 and had identified deficiencies in relation to the supervision of own checks in particular concerning cooking temperatures and traceability by the CA. The report of this mission which is published on the Health and Consumers Directorate-General Internet site at http://ec.europa.eu/food/fvo/ir_search_en.cfm, made two recommendations to the CA. Written guarantees were received from the CA in relation to the implementation of these recommendations.

Thailand is included on the list of third countries from which the import of PMP into the EU is authorised (Part 2, Annex II to Commission Decision (EC) No 2007/777). However, due to the avian influenza (AI) occurrence PMP should be heat treated as is specified in Point 4, Article 1 of Commission Decision (EC) No 2005/692.

4.2 PRODUCTION AND TRADE INFORMATION

According to the CA's preliminary data for 2008 the total production of chicken meat in Thailand was about 1,366 thousand tonnes of which 181 thousand tonnes of heat treated chicken meat were exported to the EU. 11 thousand tonnes of heat treated duck meat were also exported to the EU. The main EU countries of destination were Great Britain, the Netherlands and Germany.

5 FINDINGS AND CONCLUSIONS

5.1 LEGISLATION AND IMPLEMENTING MEASURES

5.1.1 Findings

A comprehensive review of the Thai legislation was not carried out as a part of this mission.

According to the CA both poultry meat (PM) and PMP for export to the EU, are covered by Thai legislation such as the Food Act, the Agricultural Standards Act, the Animal Slaughter Control and Meat Sale Act and other acts, regulations, proclamations and orders of the Department of Livestock Development (DLD) of Ministry of Agriculture and Cooperatives. One of the main DLD regulations covering the requirements for the production and inspection of PM/PMP, in particular for that for export, is Poultry Meat and Poultry Meat Products Inspection Regulations B.E. 2548 (PM&PMPIR). The MT was informed by the CA that the relevant Community legislation was taken into consideration during official controls.

The CA including official veterinarians (OVs) in charge of establishments and meat inspectors (MIs) use written procedures (check lists and inspection reports) which cover most of the official controls carried out on PMP prior to export.

5.1.2 Conclusion

While a comprehensive analysis of Thai legislation was not carried out, Thai laws and implementing measures were found to be adequate for the CA to guarantee the quality of PMP for export to the EU.

5.2 COMPETENT AUTHORITY

5.2.1 Findings

The DLD is the CA for official controls of PMP production and certification for its export to the EU. Two DLD bureaus, namely the Bureau of Livestock Standards & Certification (BLSC) and the Bureau of Quality Control and Livestock Products (BQCLP) implement the official controls on PMP prior to its export to the EU.

The Livestock Certification Division of the BLSC is responsible for the approval of establishments for export to the EU (EU listed) and Hazard Analysis and Critical Control Points (HACCP) based own check systems. The Livestock Product Inspection Division of BLSC is responsible for the regular inspections of EU listed establishments and the monitoring of OV and MI activities in these establishments. The MT was informed by the CA that MIs should as a minimum be high school graduates or have experience in a meat plant for at least two years and in addition they should complete theoretical and practical courses on slaughterhouse and meat plant inspection including ante and post mortem inspection, animal welfare, good manufacturing practise, HACCP and traceability. The MIs work under the supervision of OVs and assist them in carrying out many practical tasks.

The BQCLP and in particular the Veterinary Public Health Laboratory (VPHL) are responsible for the analytical examination of official samples including those of PM,

PMP, water and ice used in processing establishments.

According to the information provided by the CA, the legal powers of the CA are laid down in several Thai legal acts, proclamations and regulations in particular PM&PMPIR. This gives the CA the necessary powers to ensure that Community equivalent standards are met for PMP produced for EU export.

The CA gave details to the MT of the system of training for OVs and MIs and the implementation of this training in 2008 covering ante and post mortem inspection, HACCP etc. The MT noted that some of these training courses were based on outdated Community legislation, for instance Council Directive 77/99/EEC which has been replaced, since 2006, by Regulations (EC) Nos 852/2004, 853/2004 and 854/2004 of the European Parliament and of the Council.

During the on-site visits the MT noted that OVs in charge of establishments have copies of some of the relevant Community legislation. The MT noted that OVs at local level have a summary understanding of Community legislation. However, they were unaware of the details of this, e.g. the required temperature for PM during cutting operations, recall procedures for unsafe product etc. This lack of detailed knowledge does not meet the requirements for EU export certification (Part II.2, Annex III to Decision (EC) No 2007/777). OVs in two establishments admitted their lack of knowledge of Community requirements and their need for further training.

5.2.2 Conclusion

The CA has appropriate structures and sufficient number of qualified staff to perform official controls on PM/PMP. However, despite regular training being organised by the central CA, there is a lack of detailed knowledge of Community requirements.

5.3 OFFICIAL CONTROLS OF PRODUCTION AND PLACING ON THE MARKET

5.3.1 Findings

Approval procedures

There is an established CA procedure for approval of establishments for export under the PM&PMPIR. Approval documents were found in all establishments visited. An assessment of HACCP is a part of the approval procedure. The CA has the necessary legal powers, under Point 8.4., Article 24 of PM&PMPIR, to withdraw from the EU list establishments that fail to fulfil the necessary standards. The MT was informed by the BLSC that no withdrawals/suspensions of establishments from the EU list were made in 2007/2008.

Controls at slaughterhouses: Ante-mortem and Post-mortem ins pection

The MT noted that the ante mortem inspection process was begun by a private veterinarian in broiler farms seven days before slaughter. The DLD inspectors regularly took cloacal swab samples for AI laboratory examination approximately eight to 10 days

before harvesting. Three days before slaughter they checked flock records, clinical health status of flocks, housing conditions and animal welfare. The results of inspections were properly recorded by private veterinarians and DLD inspectors on the specifically designed forms. Movement permits to deliver poultry to the slaughterhouse were issued by DLD inspectors after AI test results were provided by the laboratory.

The MT noted that further ante-mortem inspections were carried out by MIs in the slaughterhouses under the supervision of OVs and included checks on food chain information, movement documents for live poultry, AI test results, animal welfare during slaughter and traceability of birds to individual rearing houses in farms.

The MT found that post-mortem inspection was carried out on all eviscerated poultry by MIs under the supervision of OVs. 300 birds per farm were inspected by the OVs daily in slaughterhouses visited (it was the requirement of Point 47, Chapter VIII, Annex I to Council Directive 71/118/EEC; this directive is not applicable anymore since 2006). According to point 1(a), Part B, Chapter V, Section IV, Annex I to Regulation (EC) No 854/2004 the OV is personally to carry out the daily inspection of the viscera and body cavities of a representative sample of birds. Records of post mortem inspection were available to the MT and were found to be complete.

However, the MT noted, in one slaughterhouse visited, within the observation period of five minutes that two to three viscera out of 10 were missing on several occasions at the point of post mortem inspection which is not in line with the requirements of Point 1, Part D, Chapter II, Section I, Annex I to Regulation (EC) No 854/2004. Subsequently, these poultry carcasses were judged by MIs as fit for human consumption without further investigation. No evidence of adjustments to the slaughter line or of any other corrective action was noted by the MT.

The MT observed the rinsing of carcasses before the post mortem inspection in two slaughterhouses visited which makes it impossible for the OV to examine for possible faecal contamination as required under Point 2(b), Chapter I, Section I, Annex I to Regulation (EC) No 854/2004.

Under the Point 1(b), Part B, Chapter V, Section IV, Annex I to Regulation (EC) No 854/2004 the OV is personally to carry out a detailed inspection of a random sample, from each batch of birds having the same origin, of parts of birds or entire birds declared unfit for human consumption following the post mortem inspection. However, MT noted that these condemned carcasses were not inspected by OVs in charge of slaughterhouses visited.

In general, OVs were adequately involved in the supervision of MIs' activities.

Controls at establishment level (slaughterhouses, cutting plants, cold stores, PMP establishments)

The checklist based system of official inspection in establishments including checks on HACCP plans is generally comprehensive, well organised and well documented. The MT found that regular inspections were carried out by the local and central CA including checks on operational, pre-operational and personnel hygiene, temperature, traceability and HACCP plans.

However, in four of the nine establishments visited, the MT noted shortcomings some of which were significant (e.g. non compliant establishment or non compliant departments as detailed in section establishments of chapter 5.7.1.) which had not previously been recorded in CA inspection reports.

Official sampling

The MT noted that PM, PMP, water and ice were regularly tested for microbiological parameters in an official laboratory accredited to ISO17025. Regular *Listeria Monocytogenes tests* were carried out on PMP with no positive cases in 2007/2008. Regular *Salmonella* laboratory tests were carried out on poultry carcasses, fresh PM and PMP. In case of *Salmonella* positive laboratory results in poultry carcasses and fresh PM in 2008 the MT noted that the CA investigated the cases and corrective actions were taken. However, the MT noted that the sampling of poultry carcasses was carried out using a "carcase rinse" method instead of the "neck skin" method as required by Point 2.1.5, Chapter 2, Annex I to Regulation (EC) No 2073/ 2005. The CA did not provide the MT with information on equivalency of this sampling method with that required under Community law. Regular laboratory tests for *Campylobacter jejuni/coli* were carried on samples taken at different stages between farm and establishment.

It was noted that on five separate occasions during 2008, PMP originating in different establishments and exported to the EU, tested positive for *Salmonella spp*. in the official laboratory. The MT was informed by the CA that two PMP random sample units were taken by the CA during sampling. One sample unit was sent to the official laboratory for testing and the other sample was kept in the establishment cold store for reconfirmation in case of dispute. According to the Point 1.9., Chapter I, Annex I to Commission Regulation (EC) No 2073/2005 *Salmonella* absence in 10g is required in five sample units tested and not only in one. On these five occasions, own check samples from the same batches had been tested in parallel by the Food Business Operator (FBO) in a private laboratory accredited to ISO17025 with negative results. In addition, this private laboratory tested the second official sample kept for confirmatory purposes with negative results. The CA, having examined the records of the own checks carried out by the FBO, decided to rely on the results of the private accredited laboratory. The FBO did not consider necessary to inform importer in order to launch a withdrawal procedure as required by Point 2, Article 7 of Regulation (EC) No 2073/2005 or recall in accordance with Article 19 of Regulation (EC) No 178/2002 of the European Parliament and of the Council. There was no investigation by the CA on the causes for the discrepancies between the laboratory results. In addition, the CA explained to the MT that the results of tests carried out in the official laboratory were in general received by the CA between two and four weeks after the samples had been taken. The MT noted that, once positive results in paper format had been received by the CA, and communicated to the FBO appropriate corrective actions including assessment of HACCP records and additional sampling were taken by the FBO. This practice leads to excessive delays in taking corrective action.

Heat treatment of PMP

The MT found that heat treatment of PMP was regularly monitored by the CA.

An adequate control of heat treatment was carried out by FBOs and was regarded as a critical control point in all establishments visited.

RASFF

There have been three Rapid Alert System for Food and Feed (RASFF) notifications since 2006 concerning Thai PMP. The most recent RASFF notifications dated 2/01/2009 and 18/12/2008 were due to the bad hygienic state of frozen PMP commercial samples. According to the CA the FBOs suspected leakage in the foam box containing the sample in the first case and a delay of two days by importer to collect sample in second case.

A third case was related to inadequate heat processing of frozen cooked chicken meat. According to the CA the heat treatment was above +70°C but below the limit of +75°C applied by the FBO. The CA provided the EU Commission with investigation results by letter dated 24/11/2008. According to the CA the FBO implemented measures to reheat the products if core temperature of the PMP is below +75°C.

5.3.2 Conclusions

Approval procedures

The approval procedure for establishments was found, in general, to be comprehensive and well organised.

Controls at slaughterhouses: Ante-mortem and Post-mortem inspection

Ante and post mortem inspection in slaughterhouses was found to be well organised, implemented and recorded other than for shortcomings in relation to washing of poultry carcasses before post mortem inspection, missing viscera at post mortem inspection and the absence of inspection of condemned carcasses by OV.

Controls at establishment level (slaughterhouses, cutting plants, cold stores, PMP establishments)

There is a comprehensive and documented system of official controls in PM/PMP establishments. All establishments visited by the MT were regularly controlled by OVs from local and central CA level. Despite the fact that the establishments visited by the MT generally satisfied Community equivalent standards, some deficiencies were noted by the MT which had not previously been noted in the CA official reports.

Official sampling

A comprehensive sampling programme for microbiology in PM/PMP/water/ice is implemented in poultry establishments. However, the official sampling for *Salmonella* in PMP is not equivalent to the Community requirements (Point 1.9., Chapter I, Annex I to Commission Regulation (EC) No 2073/2005). The sampling of poultry carcasses is carried out by "rinsing method" instead of the "neck skin" method as required by

Regulation (EC) No 2073/ 2005. In the case of positive laboratory results for *Salmonella* in PMP the FBOs did not inform importers in order to apply recall or withdrawal procedures.

Heat treatment of PMP

Heat treatment of PMP was found to be well implemented by the FBOs in establishments visited and adequately monitored during the own checks and by the CA.

RASFF

RASFF were adequately investigated by the CA and corrective actions were taken.

5.4 OWN CHECKS

5.4.1 Findings

According to the DLD Regulation regarding Implementation of the HACCP System for Slaughterhouses and Factories Producing Animal Meat for Export, all animal meat processing establishments have to implement a HACCP plan. This Regulation describes how the HACCP system should be implemented by FBOs and supervised by the CA. A DLD "Committee" certifies the HACCP system for a three year period for individual products.

The MT noted that FBOs implement a comprehensive system of laboratory controls for PM, PMP, water and ice in particular for microbiological tests. The microbiological tests on PM/PMP include total plate count, *coliforms*, *E.coli*, *Faecal streptococcocus*, *Staphylococcus aureus*, *Salmonella spp*., *Clostridium perfringens*, *yeasts and moulds, Listeria spp*. *and* in particular *Listeria monocytogenes*. The analyses were carried out in laboratories accredited to ISO17025 which belong to FBOs.

The MT noted, in general, adequate implementation of HACCP based own check systems in establishments visited.

5.4.2 Conclusion

HACCP based own check systems were found to be adequately implemented and regularly audited by the CA in the establishments visited by the MT.

5.5 LABORATORIES

5.5.1 Findings

The BQCLP laboratory is the only official laboratory in Thailand involved in analyses of official samples from EU listed establishments. The MT noted that the laboratory has adequate facilities and competent staff. The laboratory is accredited, since May 2008, to ISO17025 for food testing in particular for *Salmonella spp.* and *Listeria Monocytogenes*.

The MT noted that the method used to test for *Listeria Monocytogenes* is AOAC, 2003 not EN/ISO 11290-2 as required by Point 1.2, Chapter I, Annex I to Commission (EC) No 2073/2005. The laboratory participates in regular proficiency testing as part of a food examination performance assessment scheme with a laboratory in the United Kingdom with adequate results. This microbiology testing includes *Salmonella spp.* and *Listeria Monocytogenes.*

The MT noted significant differences between results of tests on PM/PMP from the same production batch between the official and private accredited laboratories as indicated earlier in second paragraph of official sampling section of chapter 5.3.1.. The MT requested an explanation from the CA and none was provided.

Ring tests are organised by the BQCLP laboratory for the private laboratories which analyse own check samples from the EU listed establishments. The MT was provided with the results of these ring tests organized for 38 laboratories in 2007.

5.5.2 Conclusion

The laboratory analysing official microbiology tests has adequate facilities, competent staff and regularly participates in proficiency testing. However, the MT noted significant discrepancies between results provided by this laboratory and private laboratories. These discrepancies had not been adequately investigated.

5.6 OFFICIAL CERTIFICATION

5.6.1 Findings

The CA has established a comprehensive EU export certification procedure based on checklists and forms. OVs complete these documents with detailed information taking into account official control data including ante and post mortem inspection, laboratory analyses, traceability etc. The documents supporting the EU export certification is sent to central CA (BLSC) from where the EU export certificates are issued. The MT noted adequate registration and filing of certificates.

The current system of certification of PMP was found to be comprehensive and adequate other than the lack of detailed knowledge of the relevant Community legislation as indicated in Chapter 5.2. above.

5.6.2 Conclusion

Official certification is well organised and implemented. However, there is lack of CA knowledge of the relevant Community legislation in particular at local CA level.

5.7 ON SITE VISITS

5.7.1 Findings

<u>Farms</u>

The MT visited two farms supplying broilers to EU listed slaughterhouses. The MT found adequate bio-security measures in place on this farm. Farmer's and official inspection records were available to the MT. The MT noted that regular inspections (twice per year) by the DLD inspectors had been carried out. However, the MT found in one farm that antimicrobials had been used during the production cycles. Data on antimicrobial treatment in prescription forms issued by the private veterinarian in charge of the farm did not match the data on the daily record forms filled in and kept by the farmer. The person responsible for the registration of veterinary medicines used on the farm explained to the MT that he did not always enter data accurately in the log book. He admitted that sometimes he copied the data from another flock log book. This could lead to inaccuracies in food chain information provided by the farmer to the slaughterhouse FBO. No explanation on this issue was provided by the CA. The discrepancies had not been noted during official controls carried out by the DLD inspectors.

The MT was informed by the CA that official *Salmonella* sampling (cloacal swab) had been started in the fourth quarter of 2008. Evidence of these tests was seen by the MT. The MT was informed by the CA that for 2009 it is expected to test at least one flock of broilers on 10% of the holdings with more than 5,000 birds using either faeces or boot swab samples.

Establishments

The MT observed that most establishments met Community equivalent standards. However in one establishment major non-compliances were found regarding maintenance of surfaces in almost all departments. The FBO informed the MT that the plan on upgrading of establishment would be discussed in forthcoming management meeting. In two further establishments the MT noted that surfaces in individual departments (such as grilling/freezing of cut meat) were not up to equivalent standards.

In one establishment visited the MT found the cold store containing unlabelled PM in an unacceptable condition (standing water on floors, heavy condensation on ceiling and upper structures, rotten wooden pallets). Although the FBO and the CA informed the MT that these particular products were destined for domestic market only, there was no evidence to support this information.

In another establishment visited the MT observed that the stunning of animals before bleeding was not effectively done. The strength and duration of current used did not ensure that the animals were immediately rendered unconscious and remained so until death. The FBO took immediate corrective action.

General shortcomings in the establishments noted by the MT covered:

- Maintenance of cold chain on PM during the cutting operations in three establishments (from +6°C up to +8°C instead of up to +4°C as required by Point 1(b), Chapter V, Section II, Annex III to Regulation (EC) No 853/2004. The necessary corrective actions were taken by the FBOs immediately;
- Cracked walls, poor flooring, poor ceilings which are difficult to clean and disinfect in two establishments (this is not in line with Point 1(a) and (b), Chapter II, Annex II, Regulation (EC) No 852/2004);

- In one visited establishment MT saw deficiencies in the cleaning procedure of crates for transport of live birds.

5.7.2 Conclusion

Farms

Official controls of farms is well organised and documented. However, there are discrepancies in records for antimicrobial treatment of birds.

Establishments

In general establishments were found to be in line with Community requirements. However, the effectiveness of the CA controls is compromised by the deficiencies not spotted during the CA controls and one non-compliant establishment.

6 OVERALL CONCLUSION

There is a well organised and documented official control system in place and that the production conditions are generally satisfactory. Overall, the system is capable of guaranteeing standards equivalent to those required by Community legislation. However, the effectiveness of the control system is compromised by deficiencies regarding microbiological analyses, post-mortem inspection and the conditions observed in some establishments.

7 CLOSING MEETING

During the closing meeting held in Bangkok on 27/02/2009, the MT presented the findings and preliminary conclusions of the mission to the CA.

During this meeting, the CAs acknowledged the findings and preliminary conclusions presented by the MT. The MT requested information on measures to be taken on major non-compliances. The CA provided a commitment to correct the deficiencies including the non–compliances found in establishments.

8 RECOMMENDATIONS

The CA should provide Commission services with an action plan, including a timetable for its completion, within 25 working days of receipt of the report, in order to address the following recommendations for PMP exported to the EU.

No.	Recommendation
1	The CA should ensure that the official veterinarians participating in the EU certification chain are familiar with the Community requirements as referred to in the EU export certificates (Part II.2, Annex III to Decision (EC) No 2007/777).
2	The CA should guarantee the conditions equivalent to those required in Point

No.	Recommendation
	1(b), Part B, Chapter V, Section IV, Annex I to Regulation (EC) No 854/2004: an OV is personally to carry out a detailed inspection of a random sample, from each batch of birds having the same origin, of parts of birds or entire birds declared unfit for human consumption following the post mortem inspection.
3	The CA should ensure that offal accompany the carcasses to post mortem inspection in line with the requirements of Point 1, Part D, Chapter II, Section I, Annex I to Regulation (EC) No 854/2004.
4	The CA should ensure that slaughtered animals can be inspected properly during post-mortem inspection. In particular and in order to allow OVs to verify that meat does not show soiling, faecal or other contamination in line with Point 1(s), Chapter V, Section II, Annex I to Regulation (EC) No 854/2004, the poultry carcasses should not be rinsed before the post mortem inspection has been carried out.
5	The CA should ensure that the EU listed establishments meet with Community requirements as required by Article 12(2) of Regulation (EC) No 854/2004 and in particular comply with the requirements laid down in Point 1(a) and (b), Chapter II, Annex II to Regulation (EC) No 852/2004.
6	The CA should ensure that the Salmonella sampling and analysis on PMP is carried out in line with the requirements of Point 1.9., Chapter I, Annex I to Regulation (EC) No 2073/2005.
7	The CA should demonstrate that the "carcass rinse" method for Salmonella sampling is equivalent to the relevant method prescribed by Point 2.1.5, Chapter 2, Annex I to Regulation (EC) No 2073/ 2005.
8	The CA should provide guarantees that when testing against food safety criteria set out in Chapter 1 of Annex I to Regulation (EC) No 2073/2005 provides unsatisfactory results, the importer of the product or batch of food-stuffs already exported to EU is informed without delay in order that this operator withdraws or recalls the products concerned in accordance with Article 19 of Regulation (EC) No 178/2002.

The competent authority's response to the recommendations can be found at:

http://ec.europa.eu/food/fvo/ap/ap_thailand_8061_2009.pdf

ANNEX 1 - LIST OF LEGISLATION REFERENCED IN THE REPORT

Reference	OJ Ref.	Detail
Animal welfare at the time of slaughter		
Directive 93/119/EC	OJ L 340, 31.12.1993, p. 21–34	Council Directive 93/119/EC of 22 December 1993 on the protection of animals at the time of slaughter or killing
Public Health		
Regulation (EC) No 852/2004	OJ L 139, 30.4.2004, p. 1, Corrected and re-published in OJ L 226, 25.6.2004, p. 3	Regulation (EC) No 852/2004 of the European Parliament and of the Council of 29 April 2004 on the hygiene of foodstuffs
Regulation (EC) No 853/2004	OJ L 139, 30.4.2004, p. 55, Corrected and re-published in OJ L 226, 25.6.2004, p. 22	Regulation (EC) No 853/2004 of the European Parliament and of the Council of 29 April 2004 laying down specific hygiene rules for food of animal origin
Regulation (EC) No 854/2004	OJ L 139, 30.4.2004, p. 206, Corrected and re-published in OJ L 226, 25.6.2004, p. 83	Regulation (EC) No 854/2004 of the European Parliament and of the Council of 29 April 2004 laying down specific rules for the organisation of official controls on products of animal origin intended for human consumption
Regulation (EC) No 2073/2005	OJ L 338, 22.12.2005, p. 1–26	Commission Regulation (EC) No 2073/2005 of 15 November 2005 on microbiological criteria for foodstuffs
Regulation (EC) No 2074/2005	OJ L 338, 22.12.2005, p. 27–59	Commission Regulation (EC) No 2074/2005 of 5 December 2005 laying down implementing measures for certain products under Regulation (EC) No 853/2004 of the European Parliament and of the Council and for the organisation of official controls under Regulation (EC) No 854/2004 of the European Parliament and of the Council and Regulation (EC) No 882/2004 of the European Parliament and of the Council, derogating from

Reference	OJ Ref.	Detail
		Regulation (EC) No 852/2004 of the European Parliament and of the Council and amending Regulations (EC) No 853/2004 and (EC) No 854/2004
Regulation (EC) No 2076/2005	OJ L 338, 22.12.2005, p. 83–88	Commission Regulation (EC) No 2076/2005 of 5 December 2005 laying down transitional arrangements for the implementation of Regulations (EC) No 853/2004, (EC) No 854/2004 and (EC) No 882/2004 of the European Parliament and of the Council and amending Regulations (EC) No 853/2004 and (EC) No 854/2004
Decision 2007/777/EC	OJ L 312, 30.11.2007, p. 49–67	2007/777/EC: Commission Decision of 29 November 2007 laying down the animal and public health conditions and model certificates for imports of certain meat products and treated stomachs, bladders and intestines for human consumption from third countries and repealing Decision 2005/432/EC
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 98/140/EC	OJ L 38, 12.2.1998, p. 14–16	98/140/EC: Commission Decision of 4 February 1998 laying down certain detailed rules concerning on-the-spot checks carried out in the veterinary field by Commission experts in third countries
Directive 71/118/EEC	OJ L 55, 8.3.1971, p. 23–39	Council Directive 71/118/EEC of 15 February 1971 on health problems affecting trade in fresh poultrymeat (Repealed by Directive 2004/41/EC of the European Parliament and of the Council of 21 April 2004)
Regulation (EC) No 178/2002	OJ L 31, 1.2.2002, p. 1–24	Regulation (EC) No 178/2002 of the European Parliament and of the Council of 28 January 2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety