

Note: Latest amendments are marked with a vertical line down the left margin
IMPORTANT

Exporters and certifying Official Veterinarians (OVs) are advised that the conditions for export of pig meat to the People's Republic of China (PRC) are complex and demanding. Clearances for certain non-notifiable diseases such as Porcine Reproductive and Respiratory Syndrome (PRRS) on premises of origin are not straightforward and special procedures have been introduced to facilitate these declarations.

Well in advance of exports taking place, exporters and certifying OVs must become familiar with these notes for guidance and all associated documents. In the event of any questions, they are advised to contact the APHA Centre for International Trade (CIT) by email at product.exports@apha.gsi.gov.uk or by phone at 03000 200 301 or DAERA in Northern Ireland at VS.Implementation@daera-ni.gov.uk.

In an attempt to simplify the procedures, these notes 7006NFG have been split into five separate parts as follows:

- 7006NFG – Part 1: Introduction and General Principles (read first) (this document)
- 7006NFG – Part 2: Farm Assurances
- 7006NFG – Part 3: Slaughterhouses and cutting plants
- 7006NFG – Part 4: Standalone cutting plants
- 7006NFG – Part 5: Final certification at exporting cold stores
- 7006NFG – Flow diagram of export chain

Associated Documents

- Included in 7006NFG – Part 1:
 - Annex 1: The Protocol for veterinary and health requirements for export of pig meat to the People's Republic of China
 - Annex 2: UK-China Trotters protocol
 - Annex 3: Standard Operational Procedures for Trotters;
- 7006ANNA – PAS quarterly veterinary food chain information (FCI) and health declaration for herds of origin;
- 7006ANNB – Owner/manager FCI declaration to slaughterhouse operator;
- 7006ANNC – Owner manager support declaration for PAS/farm veterinarians completing 7006ANNA;
- 7006IMC – Internal movement certificate;
- 7006EXA – Guidance on completion of the interactive pre-certificate (for export from Northern Ireland only).

These five parts and all other associated documents may be downloaded from the website of the United Kingdom Export Certification Partnership (UKECP) via the following link: www.ukecp.com/export-health-certificates. The documents can be found using the search parameters 'China', 'meat' and 'porcine'.

Alternatively, these can be obtained from APHA CIT or DAERA upon request.

7006NFG - PART 1: INTRODUCTION AND GENERAL PRINCIPLES

1. SCOPE OF EXPORTS TO THE PRC

Export health certificate 7006EHC may be used for the export from the United Kingdom to the People's Republic of China (PRC) of frozen pig meat and pig meat products **(excluding lungs, stomach and intestines and mechanically separated meat)**.

The term 'meat products' as mentioned in the present measures refers to any part of the slaughtered animals fit for human consumption, including the body, meat, viscera, by-products, and products made of the aforementioned products as raw materials, excluding canned products.

The definition of lungs does not include the trachea to the level of the tracheal bifurcation. The definition of stomach and intestines excludes the oesophagus.

Export health certificate 7006EHC cannot be used for the export of processed products, nor can 7006EHC be used for the export of composite products.

Export of Trotters to the PRC

Export of trotters to the PRC **is now permitted** but can take place **only** from those premises that have been specifically approved to do so. There are no current stand-alone cutting plants approved for trotters to China. Therefore instructions on trotters are not included in Part IV of these guidance notes package.

Establishments that are not specifically approved for the export of trotters to China must exclude from their exports to China the anatomical parts defined as "trotters", as follows:

The definition of feet or trotters includes the foot/trotter to the level of, and includes, the carpal bones for the fore foot/trotter. For the hind foot/trotter this includes the foot/trotter to the level of, and includes, the tarsal bones for the hind foot/trotter.

Establishments that are specifically approved for the export of trotters must ensure that any products that include trotters as an anatomical part (as defined above) totally or partially, fully comply with the conditions required for the production and certification of trotters exported to China.

Operators of premises approved to export trotters to the PRC are required to comply with officially agreed written procedures covering production, handling, inspection, storage and packaging of trotters, together with methods of sampling and microbiological criteria. These procedures are described in the document entitled '*The Standard Operating Procedures for the export of trotters to the People's Republic of China*'. This document and the document to which it refers '*Processing Sanitary Requirements of United Kingdom Establishments for Exporting Trotters to the People's Republic of China*' are available from the UKECP website.

Operators of premises wishing to gain approval for export of trotters to the PRC should refer to paragraph 3 of these notes for further guidance on the approvals process.

Export of Pig Aorta and Trachea to the PRC

A market has been identified in the PRC for trimmed pig aorta and trimmed pig trachea as standalone commodities. The following guidance has been received via the British Embassy in Beijing regarding the processing and packaging of these products:

- Pig aorta intended for export to the PRC must be trimmed of any other adherent structures i.e. connective tissue, trachea, oesophagus and vena cavae. All visible lymph nodes must be removed.
- Trimmed pig aorta may be packaged on its own in boxes bearing the product description 'Aorta' on the box label.
- Trimmed pig aorta and trimmed trachea may be packed in the same box but must be anatomically and physically separated within the box. The outside of the boxes should bear the product description 'Aorta and Trachea'.

2. IMPORT PERMIT

Prior to making arrangements to export pig meat to the PRC, exporters are advised to ensure that the necessary import permit and any other import documentation are available.

Import permits are issued from the local office of the PRC Quarantine and Inspection Service. Application is usually made by the Chinese customer or local import company in China. The permit is specific to the UK exporter and is normally valid for a maximum of 6 months. It will take approximately 20 working days for the permit to be available after the application has been made.

3. APPROVAL OF MEAT PLANTS AND COLD STORES TO EXPORT TO THE PRC

All slaughterhouses, cutting premises, manufacturing premises and cold stores intending to export eligible pork and pig meat products to PRC require specific inspection and approval prior to export taking place. As described in paragraph 1 above, additional approval is required for establishments wishing to export trotters to the PRC. Establishments should contact APHA CIT or DAERA in the first instance for information on the approval process.

All establishments approved for export to PRC must comply fully with UK requirements. Establishments with an outcome of 'Improvement necessary' or 'Urgent improvement necessary' in their most recent UK compliance audit are not eligible to export to PRC.

In GB, approval inspections are carried out by the Food Standards Agency (FSA) to check compliance with PRC requirements. These are carried out by DAERA in Northern Ireland. Recommendations for approval by the FSA and DAERA are forwarded by Defra to the veterinary authorities of the PRC for consideration.

Once listed by the PRC as approved to export, establishments are subject to quarterly audit inspections by the FSA or DAERA to ensure ongoing compliance against the UK and Chinese export requirements.

Each establishment in the supply chain must be on the current list of approved establishments maintained by the PRC Veterinary authorities. The list is available at <https://cifquerquery.singlewindow.cn/>

In Great Britain, further details on procedures for approval of establishments to export to PRC can be obtained from APHA CIT. Establishments in NI should contact DAERA.

Additional Requirements for Establishments Approved to Export to PRC

Copies of all relevant documents including the current Chinese protocol for the import of pig meat from the UK, Chinese labelling Regulations and the FBO's Standard Operating Procedures (SOPs), including their SOP for segregation/separation, and OV records must be kept in the FSA/Food Standards Scotland (FSS)/DAERA office at the FBO establishment. These documents must be readily available for audit. The FBO must also have copies of relevant standards and procedures.

The OV at the slaughterhouse must have access to Veterinary Certification and producers' declarations from supplying farms to ensure that s/he (the OV) has the knowledge to certify that the pigs originate from farms which comply with the Chinese requirements. This knowledge can be gained from personal knowledge of procedures at the slaughterhouse and / or from reference to records provided by the slaughterhouse.

Segregation/Separation:

All PRC export-eligible animals (i.e. pigs that originate from premises declared free from specified diseases) must be lairaged, slaughtered and processed separately from animals not eligible for export to the PRC.

All PRC export-eligible carcasses from which the meat for export to the PRC is derived must be stored separately in chillers and segregated from other ineligible carcasses prior to further processing for export.

All PRC export-eligible meat must be processed, wrapped and packaged separately from other meat not eligible for export.

In order to ensure PRC's requirements for traceability and segregation, meat eligible for export to PRC must be clearly identified throughout the entire export chain.

The OV at the slaughterhouse must be fully familiar with the SOPs for segregation/separation. These written procedures must explain how this requirement is achieved and maintained in the slaughterhouse from the lairage to point of dispatch and (if co-located) in the cutting plant from the intake of meat to dispatch.

4. COMPLIANCE WITH IMPORT REQUIREMENTS OF THE PRC

In order to certify the health attestation that the consignment is in compliance with the import conditions of the PRC, OVs must be familiar with the following documents:

- The Protocol between Defra and The General Administration of Customs China (GACC) on veterinary and health requirements for pork to be exported from the United Kingdom to China (hereafter referred to as 'The Protocol'); and in the case of export of trotters, the details within Annex 2 later in this document

5. THE PROTOCOL (ANNEX 1)

The Protocol has 16 Articles. For the purposes of certification of exports of pig meat, Articles 4 - 10 refer.

Articles 1 and 2 and Articles 11 - 16 may be certified by the OV on the basis of information already supplied to GACC by the UK competent authorities, together with operating and administrative procedures described in these Articles as agreed between Defra and GACC`.

Article 3 regarding National disease freedoms may be certified on behalf of the Department on the basis of written authority from the Department at the final premises of dispatch.

Article 4(a) - origin of the animals from which the exported meat is derived:

The UK origin of the pigs from which the meat was derived can be certified on the basis of completed electronic or paper internal movement documents completed by the OV at supplying slaughterhouses and cutting plants indicating compliance with PRC requirements.

- Please refer to 7006NFG - Part 2: Farm Assurances for full details.

Articles 4(b) and 4(c) - premises of origin freedom from non-notifiable diseases

- Please refer to 7006NFG - Part 2: Farm Assurances for full details.

Article 5 - approval of premises exporting to the PRC

See Section 3 above. All establishments in the export supply chain must hold prior approval to export to the PRC.

Article 6 - compliance with UK Hygiene Regulations / fitness for human consumption

- Please refer to 7006NFG - Part 3: Slaughterhouses and cutting plants for full details.

Article 7 - segregation of slaughter for non-eligible animals and provision of a dedicated area for storage

- Please refer to 7006NFG - Part 3 for slaughterhouses and cutting plants, Part 4 for standalone cutting plants and Part 5 for exporting cold stores for full details.

Articles 8 and 9 - wrapping, packaging and storage of exported goods

- Please refer to 7006NFG - Part 3 for slaughterhouses and cutting plants and Part 4 for standalone cutting plants for full details.

6. ADVANCE PROVISION OF OV NAMES

Following GACC Import and Export Food Safety Bureau Letter [2024] No. 269 on **29 July 2024**, the list of OVs approved to export to China (the "OV list") only requires the name of the OVs. Specimen signatures and stamps are no longer required. The PRC requires that all OVs completing final export certification using 7006EHC must first ensure their name has been supplied to GACC (via Defra) and make sure it is within the current list before certifying exports to China. If it is not on the list then GACC will reject the consignment.

Please refer to section 2 of '7006NFG Part 5' for further details on procedures for advance notification.

7. ELECTRONIC NOTIFICATION OF CERTIFICATION

The Official Veterinarians (OV) providing final certification for consignments to PRC are required to submit a weekly notification spreadsheet to APHA at the following email address - processingteam@apha.gov.uk by 12 noon every Monday or, if in NI, to DAERA at vs.implementation@daera-ni.gov.uk by 11am every Monday. Note that GACC have brought in the new Electronic Information Verification System for Veterinary Health Certificates for Exports of Meat Products to China (known as "eCert") system.

Please refer to section 8 of '7006NFG Part 5' for further details of procedures for electronic notification.

8. **DISCLAIMER**

These notes are provided on the basis of information available at the time. It is the exporter's responsibility to check the information against any relevant import permit or any advice provided by the competent authority in the importing country.

OVs and exporters should note that they have the final responsibility to ensure that the details on the completed certificates are correct. _

For further advice exporters should contact the APHA Centre for International Trade (CIT) Carlisle at product.exports@apha.gov.uk or by phone at 03000 200 301 or DAERA in Northern Ireland at VS.Implementation@daera-ni.gov.uk.

**PROTOCOL BETWEEN
THE DEPARTMENT FOR ENVIRONMENT, FOOD AND RURAL AFFAIRS
ON BEHALF OF THE UNITED KINGDOM AGRICULTURE DEPARTMENTS
AND
THE GENERAL ADMINISTRATION OF QUALITY SUPERVISION, INSPECTION AND
QUARANTINE OF THE PEOPLE'S REPUBLIC OF CHINA
ON
VETERINARY AND HEALTH REQUIREMENTS FOR PORK
TO BE EXPORTED FROM THE UNITED KINGDOM TO CHINA**

The Department for Environment, Food and Rural Affairs on behalf of the United Kingdom Agriculture Departments (DEFRA, hereinafter referred to as the UK. side) and the General Administration of Quality Supervision, Inspection and Quarantine of the People's Republic of China (AQSIQ, hereinafter referred to as Chinese side) through friendly negotiations, have agreed the following veterinary and health requirements for pork to be exported from the United Kingdom to China:

Article 1

DEFRA, and in respect of pork from Northern Ireland, the Department of Agriculture of Rural Development Northern Ireland (DARDNI), shall be responsible for inspection and quarantine on the pork to be exported to China, and the issuance of the health certificate.

Article 2

DEFRA shall provide AQSIQ with the managing regulations on slaughtering and processing plants, the inspection and testing items, methods, procedures as well as the standards for the exported pork.

DEFRA shall provide AQSIQ with the prevention and control system related with the diseases listed in article 3 and 4, and provide AQSIQ with disease bulletin periodically, and UK residue control and monitoring program and its annual report, as well as the pathogen reducing control program and its annual report etc.

Before the first exportation and the following operation if necessary, AQSIQ may designate experts to the United Kingdom to do on-site inspection visit of the above-mentioned control system and management status within the obligatory assistance provided by DEFRA and DARDNI.

Article 3

The UK side officially confirms that its territory is free from Foot-and-Mouth Disease, Classical Swine Fever, African swine fever, Swine Vesicular Disease and Teschen Disease.

Article 4

The slaughtered swine for pork exported to the People's Republic of China shall:

- a) Be born, raised and slaughtered in the United Kingdom;
- b) Come from fanns on which there have been no occurrence of Anthrax, Atrophic Rhinitis of Swine, Aujeszky's disease, Swine Brucellosis, Tuberculosis and Trichinellosis for the last six (6) months;

- c) Originate from farms on which there has been no clinical occurrence of Porcine Reproductive and Respiratory Syndrome (PRRS) for the last six (6) months;
- d) Originate from farms where no restriction or surveillance zone has been established due to notifiable diseases in swine, which should be reported in accordance with the relevant European animal health regulations.

Article 5

The slaughtering and processing plants for exporting pork to the People's Republic of China shall meet the requirements on veterinary health and public health of Chinese and European laws and regulations.

Registration is handled according to the Regulations for Administration of Registration of Foreign Food Establishments Intended to be imported into the People's Republic of China by Certification and Accreditation Administration of the People's Republic of China (CNCA). Products from manufacturing establishments that have not got the registration from CNCA must not be imported into the People's Republic of China.

Article 6

The United Kingdom Official Veterinarian shall carry out the following functions:

- a) ante-mortem and post-mortem quarantine and inspections to the swine from which the exporting pork originated in accordance with the related EU and Chinese laws and regulations;
- b) certify that the slaughtered swine are healthy, no clinical signs of infectious disease have been found, no lesion has been found on the carcass and viscera;
- c) certify that the residue level of veterinary medicine, pesticides, heavy metals, poisonous, hazardous articles contained in the products is below the limits stipulated by China and EU;
- d) certify that the products are free from the pollution of pathogenic agent in conformity with the Chinese and UK laws;
- e) certify the hygiene and safety of the products and fit for human consumption.

Article 7

The slaughtering and processing plants for exporting pork to the People's Republic of China, shall not slaughter swine not complying with the requirements in Article 4 and shall not process pork not complying with the requirements in Article 6 of this protocol at the same time. A specific area within a cold store house shall be available exclusive for the storage of pork exported to the People's Republic of China.

Article 8

The exported pork shall be wrapped in the new packaging materials complying with the international hygienic standards. The names, weight of the product, name and address of manufacturer, its registration number, storage conditions, production date should be labelled on the outside package both in Chinese and in English. The surface of the package shall have the marks of passing inspection and quarantine, and filed by AQSIQ. The name of the product and registration number of the slaughterhouse/plant shall be marked on the internal package.

Article 9

During the package, storage and transportation, the pork to be exported to the People's Republic of China shall meet the veterinary hygienic requirements, and shall be prevented from being contaminated by poisonous and hannful substances.

The pork should be stored under the core temperature below -18°C.

After it has been loaded with the products, the container should be sealed under the supervision of the United Kingdom Veterinary Officer. The seal number should be indicated in the health certificate. The package of the products cannot be unwrapped or changed during the transportation.

Article 10

Each container of the pork intended for the export to the People's Republic of China shall be accompanied by an original veterinary health certificate, having a statement that the shipment complies with UK laws and regulations on veterinary and public health as well as this protocol.

The health certificate should be done in Chinese and English, the formula and content of the certificate should be agreed by both sides.

The UK side shall provide AQSIQ with the sample of the stamping mark, and the health certificate, signatures of the veterinarians authorized to issue the health certificate, inspected legend for registration.

AQSIQ shall be notified of any possible modifications and changes to any of the above at least one month before the changes take effect.

Article 11

If there is any occurrence in the United Kingdom of infectious and contagious disease(s) listed in Article 3 of this protocol and included in the former list A in OIE recommended which will contaminate the pork potentially or possibly, DEFRA/ DARDNI shall immediately stop exporting pork to the People's Republic of China and DEFRA will notify AQSIQ, provide the detailed infonnation about the occurrence and the elimination of the disease(s). If there is any occurrence in the United Kingdom of infectious and contagious disease(s) listed in Article 4 of this protocol and included in the former list B in OIE recommended, and any contamination crisis, DEFRA shall immediately notify AQSIQ, provide the detailed information about the occurrence of the disease(s) and its control measures, and the contamination crisis, DEFRA/ DARDNI will stop exporting pork from the relevant crisis area to the People's Republic of China. When disease(s) has/have been eliminated completely or the contamination crisis is over and if the export of products need to be resumed renewing, DEFRA shall consult with AQSIQ for approval in advance.

Article 12

If pork imported by China is found by AQSIQ not to be in compliance with the requirements of this Protocol, AQSIQ will immediately notify DEFRA, and should seek the return, detention, destruction, or other disposal of the product DEFRA will cooperate with AQSIQ to investigate in addressing any problems, including notifying AQSIQ of any remedial actions to be taken, such as the recall of any other potentially affected products and to prevent recurrence of the non-compliance.

Article 13

For the purposes of this Protocol, pork refers to any edible parts, including, the official and mental organs.

Article 14


This Protocol shall be amended with the mutual consent of both sides.

Article 15


This protocol shall come into force on the date of signing.

Article 16

This protocol is signed in HEITING, on 22nd August 2008, done in duplicate in Chinese and English. Both versions being equally authentic.



For
The Department for Environment,
Food and Rural Affairs
on behalf of the UK Agriculture Departments

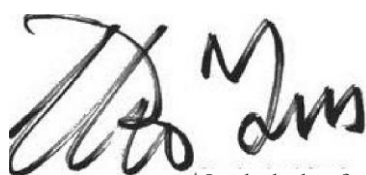


For
The General Administration of Quality
Supervision, Inspection and Quarantine
of the People's Republic of China

**Joint Statement Between
The Department for Environment, Food and Rural Affairs on Behalf
of the United Kingdom Agriculture Departments
and The General Administration of Quality Supervision, Inspection
and Quarantine of the People's Republic of China
On the Processing Sanitary Requirements
of UK Establishment for Exporting Trotters to China**

In order to ensure the safety and sanitation of trotters exported from the United Kingdom to China the Department for Environment Food and Rural Affairs on Behalf of the United Kingdom Agriculture Departments and the General Administration of Quality Supervision Inspection and Quarantine of the People's Republic of China through friendly negotiations, have reached a consensus on Processing Sanitary Requirements of UK Establishments for Exporting Trotters to China (detail to annex). Both sides agree that the Requirements in a supplement of the protocol between the General Administration of Quality Supervision, Inspection And Quarantine of the Peoples Republic of China and the Department for Environment, Food and Rural Affairs on Behalf of The United Kingdom Agriculture Departments on the sanitary and health requirements for pork to be exported from the United Kingdom to China which was signed on 22 August 2008.

The joint statement is signed in **Beijing** on 13 Dec.2015 done in duplicate in Chinese and English, all of the versions being equally authentic.



On behalf of

The Department for Environment, Food and
Rural Affairs on behalf of the United Kingdom
Agriculture Departments



On behalf of

the General Administration
of Quality Supervision,
Inspection and Quarantine of the
People's Republic of China

Annex

Processing Sanitary Requirements of UK Establishments for Exporting Trotters to The People's Republic of China

Aim: to specify the requirements applying to production of trotters of pigs for export to the people's republic of China.

Method:

- This procedure is based on bilateral agreements between the People's Republic of China and the United Kingdom
- The competent authority inspects and supervises the slaughterhouses and meat processing and storage areas.
- The food business operator is responsible for complying with these guidelines whenever producing trotters destined for export to the People's Republic of China.

Processing:

Requirements for production of trotters

1) Trotters are to be produced in a production area where the ambient temperature complies with legal requirements for meat processing areas, as laid down in EU Regulation No. 1831/2003. The maximum temperature of production environment should not exceed 12 degrees Celsius, including removing from the carcass, checking and packing of trotters. Therefore trotters eligible for further export to China shall be removed from the carcass after chilling the carcass,

2) The temperature of the trotters must comply with the same requirements as meat before they are removed from the carcass. This means that the core temperature of the trotters shall be not more than 7 degrees Celsius during production and removal of the carcass.

3) The temperature of the trotters during production must be monitored daily. Records of this monitoring must be kept for minimum of two years,

4) The production area where the trotters are removed from the carcass, including cutting, checking and packing place, must comply with pork cutting room requirements; Therefore hygienic processing of trotters must be monitored by daily SSOP checks. Sufficient lighting must be present to be able to critically assess the quality of the products.

5) Trotters showing pathological lesions or any signs of contamination must be disposed of as animal by-products and placed in a separate container clearly labelled as "category 2 ABP (Animal by-products not for animal consumption)". Trotters with quality defects (eg hairs and hooves) must not be packed for export to China.

6) All products with other defects (e.g. abscesses, sores, traces of lubricating oil etc) have to be deemed unfit for human consumption, these trotters must be collected in recipients that are clearly labelled as "Category 2 ABP (Animal by-products not for animal consumption)".

7) Trotters must meet the additional microbiological criteria mentioned in this document (Table 1).

Since the product temperature of each consignment of trotters must be monitored to verify the compliance of legal standards (EC Regulation 853/2004) before dispatch, the monitoring must be implemented in a Control Point (CP).

Corrective action

The food business operator must undertake appropriate corrective action when either the company or the competent authority realize that its quality program or implementation/maintenance of the program may have failed to prevent direct contamination.

Corrective action must include the following procedures to ensure:

- restore hygienic conditions of the product
- restore hygienic conditions of the process
- prevent the recurrence of direct contamination

Microbiological criteria:

Definition:

Trotters, front and/or hind trotters of pigs

Product	Analysis	Limit			
		n	c	m	M
Trotter	Aerobic plate count	5	3	4.0	≤ 10
	Enterobacteriaceae	5	3	2.0	3.0
	Salmonella	5	0		

Table 1. Microbiological criteria for trotters of swine

n, number of samples

c: number of samples > m

m: target value (log cfu/cm²)

M: maximum value (log cfu/cm²)

Collection of 5 samples

Item	Method	Sample site	Analysis
Trotters	<ul style="list-style-type: none"> • Samples are taken from prepared products, in the processing areas • The samples are taken using a cork borer instrument. • Four samples are taken from outer (hind) surface. • The four cork borer ring samples are combined to form a single sample. 	<ul style="list-style-type: none"> • Each cork borer sample is taken from a different side of the trotter; <ol style="list-style-type: none"> 1) Front side 2) Back side 3) Left side 4) Right side 	<ul style="list-style-type: none"> • Aerobic plate count • Enterobacteriaceae • Salmonella (1 pooled sample)

Table Z. Collection of samples

Sampling Frequency

On a **week basis** five samples must be taken from trotters. If satisfactory results (Table 3) are achieved in six consecutive weeks, the sampling frequency may be reduced to five samples every two weeks.

Satisfactory	Average value $\leq m$	Absent
Acceptable	Average value between m and M	
Unsatisfactory	Average value $> M$	Present

Table 3. Interpretation of the results of microbiological analysis.

If the results for three consecutive samples are *Acceptable*, or if the result for one sample is *Unsatisfactory*, the following action must be taken:

- The cause must be established by reference to internal process control data (temperature, hygiene, faults, other abnormalities, etc.).
- Appropriate corrective action; have to be taken to eliminate the cause.
- Additional sampling has to be conducted to verify effectiveness of the corrective action.
- The cause of the problem and details of the corrective action must be documented.

Conclusion

This process of hygiene standard on the production of trotters is an inseparable part of the certification of these products for export to the People's Republic of China. Compliance of food business operators with the standard of production must be monitored and verified by the competent authority.

In case of any non-compliance with the standard, the Competent Authority **will not** certify the trotters as eligible for export to the People's Republic of China.

Additionally, the Competent Authority will verify corrective and preventive actions taken by the food business operator before resumption of export.

STANDARD OPERATING PROCEDURE:

Production of trotters to export from the UK to the People's Republic of China

This document is approved by the Department for Environment, Food and Rural affairs, the Scottish Government, the Welsh Government and the Northern Ireland Department of Agriculture, Environment and Rural Affairs the UK Food Standards Agency and Food Standards Scotland which are the Competent Authorities in the UK for exports and food hygiene. This document is registered with The Agriculture and Horticulture Development Board (AHDB), the statutory levy board, on behalf of the UK pig meat processing industry.

The images used in this document are illustrative examples only.

1 - Inspection, storage, separation, eligibility and packing.

1. The purpose of this procedure is to ensure that trotters (pigs' feet) for export from the United Kingdom (UK) to the People's Republic of China have originated from health marked carcasses, are fit for human consumption and do not show any visible contamination (faeces, food, grass, grease, oils, lubricants, lesions etc). These trotters must have been produced and stored in accordance with the EC Regulations (Regulation (EC) 852/ 2004 and Regulation (EC) 853/ 2004). Hygienic processing of trotters is monitored by Food Business Operators approved for the export of trotters to China and verified by Official Veterinarians throughout the day by implementing this SOP.

2. Trotters exported to the People's Republic of China must comply with the requirements and specification of the Certification and Accreditation Administration of the People's Republic of China (CNCA) document "Processing Sanitary Requirements of United Kingdom Establishments for Exporting Trotters to the People's Republic of China" (CNCA has now been merged in the General Administration Customs China directorate, GACC). This processing hygiene standard for the production of trotters is an inextricable part of the certification of these products for export to the People's Republic of China. This Standard Operating Procedure implements the requirements of the Processing Hygiene Standard mentioned above. A copy of the Processing Hygiene Standard mentioned above must be kept with this Standard Operating Procedure and the Food Business Operator and the Competent Authority Officials must be aware of the Processing Hygiene Standard and of its requirements.

3. The procedures set out in this document, including results of microbiological testing and corrective actions by the FBO, must be audited and verified by the plant Competent Authority Official Veterinarian and Official Inspector during their routine inspections.

4. Sources of visible contamination on trotters can be anything in the environment of the live pig or the environment of the pig's carcass such as faeces, food (ingesta), grass or grease, oils and lubricants from the railing system. Contamination can also derive from skin lesions.
5. Carcasses must be presented to the Competent Authority Official Inspectors without visible contamination for inspection of both carcass and associated trotters
6. Carcasses that show any visible contamination must not be health marked and must be rectified.
7. Once the carcasses and associated viscera have been inspected and health marked they must be chilled to ensure a temperature throughout the meat of not more than 7°C for carcasses and not more than 3°C for offal.
8. After chilling, carcasses must be transferred to the cutting room for cutting and deboning. The temperature of the trotters must be maintained at not more than 7°C during cutting, inspection, wrapping, packaging and storage. The environmental temperature must be maintained at not more than 12 °C (this must be recorded at least daily). The temperature of the trotters must be regularly monitored and recorded, at least daily during each day of production.
9. Temperature records must be kept for a minimum of two years.

TROTTER CUTTING AND INSPECTION

10. Trotters for export to the People's Republic of China must meet the additional microbiological criteria outlined in Section 2 of this document.
11. The hygienic processing of trotters must be monitored by daily checks, at a minimum. The results of these checks must be recorded and the records kept for a minimum of two years.
12. Front trotters are cut off and placed in designated containers used to store meat (images 1 & 2). The containers must be checked for cleanliness before use. Trotters showing pathological lesions or any signs of contamination must be disposed of as animal by-products and placed in a separate container properly labelled as "Category 2 ABP (Animal by product-not for animal consumption)". Trotters with quality defects will not be packed for export to the People's Republic of China.



Image 1 – Removal of Trotters



Image 2 – Trotters placed in a hygienic container

13. Sufficient lighting (540 lux or higher) must be present to be able to critically assess the quality of the products. Hand washing facilities should be in place at this point. If disposable gloves are used, these should be changed at regular intervals. The equipment used to cut off trotters must be cleaned and sanitised with an approved method as required, but at least during breaks, and at any time that the equipment becomes contaminated. Knives, if used, must be washed and sanitised or replaced as required, but at least during breaks, and at any time they become contaminated.

14. The hind trotters are removed from the carcass once the carcass is placed on the conveyor belt. The same conditions described in points 12 and 13 also apply.

15. If, during cutting, it is observed that any equipment including band saws, conveyors, knives or containers are contaminated, the process must be stopped and corrective action taken, including cleaning and sanitisation of the contaminated equipment before production is resumed.

WRAPPING AND PACKING OF TROTTERS

16. After separation, the trotters intended for human consumption must be hygienically transported to the packing area in a manner which prevents any contamination. At the point of packing the trotters must be re-inspected (image 3) by a trained operative for the presence of visible contamination and quality defects. Sufficient lighting (540 lux or higher) must be present to be able to critically assess the quality of the products. The environmental temperature in packing areas must be maintained at not more than 12°C which must be recorded at least daily and records kept for a minimum of two years.



Image 3 – Inspection of trotters

17. Trotters which are contaminated must be rejected and disposed of as Category 2 animal by-products. Trotters that do not comply with the requirements of the “Processing Sanitary Requirements of United Kingdom Establishments for Exporting Trotters to the People’s Republic of China” must be separated and must not be exported to the People’s Republic of China. Checks of trotters at the point of packing must be designated as a Control Point (CP) for export to the People’s Republic of China. This must be regularly monitored, and verified by a supervisor. The results of monitoring checks must be recorded and records kept for a minimum of two years.

Trotters must be wrapped (image 4) and inner and outer labels attached (image 5) in accordance with the Chinese requirements. After these operations the trotters must be packed.

18. Staff who are packing the trotters must not touch the cardboard packaging if they are required to handle trotters.

19. The product must be checked for the presence of metals using a metal detector (image 6).



Image 4 – Packing of trotters into a lined box



Image 5 – Example of packing label



Image 6 – Metal detection of boxed product

Despatch

20. Packaged trotters must be stored on pallets in the despatch chiller. They must be stored in a dedicated area which is marked for meat to be exported to the People's Republic of China.

21. Before despatch of the product, the temperature of the trotters must be monitored as a Critical Control Point (CCP). The temperature of the product must be checked by putting the probe between boxes of products or, if spaces are available, through a very small space / hole without damaging the box, the plastic liner, or the products. The despatch temperature must be not more than 7°C. This must be recorded at least twice daily and results kept for a minimum of two years. In addition, the integrity of the packaging, labelling and identification marking must be checked and recorded and any deficiencies must be corrected.

22. Trotters intended for export must meet the additional microbiological criteria as detailed in the CNCA (now GACC) document on the Processing Sanitary Requirements of Establishments for Exporting Trotters to the People's Republic of China referred to in Section 2.

Competent Authority/Company corrective actions

23. If the Competent Authority Officials or the company team identify deficiencies (hygiene, maintenance, practices, others) that have or may have affected the hygiene of the product, corrective action must be taken immediately by the FBO. Corrective actions must include:

- Separation of the product that may have been affected.

- Restoring the sanitary conditions of the process by identifying and resolving the problem including cleaning, maintenance, training etc, as required.
- Restoring the sanitary conditions of the product.
- Excluding products which are known or suspected to be deficient from export to the People's Republic of China.
- Taking preventative action to prevent recurrence of the deficiency.

These corrective actions must be documented by the FBO.

2 - Microbiological testing

1. Exported trotters must comply with the CNCA (now GACC) document "Processing Sanitary Requirements of United Kingdom Establishments for Exporting Trotters to the People's Republic of China" This processing hygiene standard for the production of trotters is an inextricable part of the certification of these products for export to the People's Republic of China.
2. Trotters must meet the microbiological criteria below (Table1).
3. Samples are taken from trotters in the processing area and after chilling of the carcasses. The day of the week that sampling is carried out must be alternated.
4. The authorised sampling method for microbiological testing for the export of trotters to the People's Republic of China is the destructive method (cork boring) (images 7 & 8). This methodology is in compliance with CNCA (now GACC) testing requirements. A borer of 2.5cm diameter is used. Four samples are collected from each trotter that is sampled and the four samples collected from one trotter are pooled for testing (Table 2).
5. The sampling and microbiological testing which is required for export of trotters to the People's Republic of China (PRC) is additional and does not replace sampling and microbiological testing of carcasses as required under Regulation (EC) 2073/2005, as amended.
6. Microbiological sampling in accordance with (EC) 2073/2005 must be carried out in addition to the sampling requirements specified for the export of trotters to PRC.

7. The following microbiological criteria must be used for the interpretation of the microbiological results obtained.

Definition:

Trotters: Front and/or hind trotters of pigs.

Product Analysis Limit

Product	Analysis	Limit			
		n	c	m	M
Trotters	Aerobic plate count	5	3	4.0	5.0
	Enterobacteriaceae	5	3	2.0	3.0
	Salmonella	5	0	Absent	

Table 1. Microbiological criteria for trotters of swine

n = number of samples to be taken each week

c = number of samples > m

m = target value (log cfu/cm²)

M = maximum value (log cfu/cm²)

Collection of samples by cork boring:

8. Samples are taken from trotters in the cutting room after chilling. The samples for Aerobic plate count (APC) and Enterobacteriaceae (ENT) and Salmonella are taken using a cork borer instrument (images 7 & 8). Four samples are taken from the outer (rind) surface of each trotter that is sampled. The four cork borer skin samples from one trotter are combined to form a single sample for microbiological testing.

Item	Method	Sample site	Analysis
Trotters	<ul style="list-style-type: none"> • Samples are taken from trotters in the processing areas after chilling. • The samples are taken using a cork borer instrument. • Four samples are taken from outer (rind) surface. • The four cork borer rind samples are combined to form a single sample. 	<ul style="list-style-type: none"> • Each cork borer sample is taken from a different side of the trotter; <ol style="list-style-type: none"> 1) Front side 2) Back side 3) Left side 4) Right side 	<ul style="list-style-type: none"> • Aerobic plate count (analytical reference method ISO 4833 or alternative method certified in accordance with EN/ISO 16140) • Enterobacteriaceae cultural examination (analytical reference method ISO 21528-2 or alternative method certified in accordance with EN/ISO 16140) • Salmonella (pooled sample) cultural examination (analytical reference

			method EN/ISO 6579 or alternative method certified in accordance with EN/ISO 16140)
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Table 2. Sample collection method

	
Image 7 – Boring a sample for microbiolog testing	Image 8 – Removal of a sample for microbiological testing

Sampling Frequency

9. On a weekly basis five samples must be taken from trotters. Routinely two front trotters and three hind trotters will be sampled one week and three front and two hind the next. If satisfactory results (Table 3) are achieved in six consecutive weeks, the sampling frequency may be reduced to five samples every two weeks.

Interpretation of results

For Aerobic Plate Count (APC) and Enterobacteriaceae (ENT) - the threshold criteria are for a mean log level of 5 samples.

For Salmonella (Sal) - the requirement is that Salmonella is not detected.

	<i>Threshold criteria* for testing by boring/destructive method</i>		
	<i>Satisfactory.</i> Mean log cfu / cm ²	<i>Acceptable.</i> Mean log cfu / cm ²	<i>Unsatisfactory.</i> Mean log cfu / cm ²
Aerobic Plate Count (APC)	≤ 4.0	>4.0 but ≤5.0	>5.0
Enterobacteriaceae (ENT)	≤2.0	>2.0 but ≤3.0	>3.0
	Satisfactory	Acceptable	Unsatisfactory
Salmonella (Sal)	<i>Absence in area tested per trotter</i>	<i>(not applicable – for salmonella results are either satisfactory or unsatisfactory).</i>	Present
<i>< means less than. ≤ means less than or equal to > means more than</i>			

Table 3. Interpretation of the results of microbiological analysis for trotters.

If the results for three consecutive samples are ‘*Acceptable*’ according to the Chinese protocol category **or** if the result for one sample is ‘*Unsatisfactory*’ according to the Chinese protocol category, the following action must be taken as soon as possible:

- The cause must be established by reference to internal process control data (temperature, hygiene, faults, other abnormalities, etc.).
- Appropriate corrective actions must be taken.
- Additional sampling must be conducted to verify the effectiveness of the corrective action(s).
- The cause of the problem and details of the corrective action must be documented.
- The Competent Authority Official Veterinarian (OV) and Official Inspector must be informed if the microbiological results are ‘acceptable’ or ‘unsatisfactory’ according to the Chinese protocol category.

DEALING WITH UNSATISFACTORY MICROBIOLOGY RESULTS DURING ROUTINE TESTING OF PIG TROTTERS FOR UK EXPORT TO PRC

10. Any batches tested for compliance with the sanitary/microbiological requirements for the production of pig trotters for UK export to PRC should be quarantined at the cold store and not certified for export until written confirmation is received from the OV at the slaughterhouse / cutting plant that the results of such testing are either satisfactory or acceptable; or that, in the event of unsatisfactory results, appropriate actions have been taken. Appropriate actions must include documented investigation of the root cause and corrective actions to prevent reoccurrence.

11. This is a processing hygiene criterion. Serotyping of salmonellas is not required for export to PRC, but may be required to meet other regulatory / policy requirements. FSA/FSS may also need to do their own risk assessment if they consider it necessary.

12. The production process must be subject to a full investigation to identify the root cause of the unsatisfactory microbiological results, with corrective actions and verification of the effectiveness of the measures taken. All of these steps must be fully documented, and these documentary reports must be stored for future reference.

13. The OV at the slaughterhouse/cutting plant will verify the effectiveness of corrective actions on an ongoing basis, in accordance with the Standard Operating Procedure for the Production of Trotters to Export to PRC. In case of any non-compliance with this procedure, including failure to demonstrate the effectiveness of corrective actions, the Competent Authority will not certify trotters for export to PRC.

14. If the corrective action is ineffective, the Competent Authority will require an action plan from the food business operator to ensure compliance and will strictly supervise its outcome.

Recording and keeping results

15. Results of the trotter sampling and microbiological testing must be saved electronically. In addition, a paper copy of the results must be printed, signed off and dated by the responsible manager and filed. Corrective actions also must be documented. Results, documented corrective actions and any amendment or review of the SOP must be kept in a dedicated file for exports of trotters to the PRC. Records must be retained for a minimum of 2 years.

3 - Overall Competent Authority Controls

1. The overall Competent Authority for Food Hygiene in the UK are the UK Food Standards Agency (FSA) and Food Standards Scotland (FSS). The overall Competent Authority for export of animals and animal products from the UK is Defra.
2. The FSA, FSS and Defra recognise that the CNCA (now GACC) trotter processing hygiene standard for the production of trotters is an inextricable part of the certification of these products for export from the UK to the People's Republic of China.
3. Compliance with this standard is verified by Competent Authority Official Veterinarians during supervision at the abattoir prior to certification for internal movement within the UK.
4. If any non-compliance with the CNCA (now GACC) trotter processing hygiene standard is found, the Competent Authority will not certify the trotters as eligible for export to the PRC.
5. Additionally, the Competent Authority will verify that corrective and preventive actions have been taken by the food business operator, prior to resumption of certification.