New rules for entry of casings into the EU - residue monitoring

BACKGROUND

Import of casings into the European Union is today subject to the animal health rules established in Commission Decision 2003/779 ([1]). The certification requirements cover only animal health issues. At present, the establishments authorised to export casings to the EU are listed in TRACES (authorised as "casings only") at the request of the national authorities of 39 different third countries.

With the application of the new Official Control Regulation (EU) 2017/625 ([2]) and of Regulation (EU) 2016/429, the so-called Animal Health Law (AHL) ([3]), together with the repeal of Regulation (EC) No 854/2004, the current requirements on production and entry into the EU of casings will change as of 21 April 2021.

According to Article 229(1)(a), of the AHL, the entry of products of animal origin into the EU is subject to listing of the third countries, territories or zones of origin.

Similarly, as regards public health, Article 3 of Commission Delegated Regulation (EU) 2019/625 ([4]) requires that products of animal origin enter the Union only from listed third countries (list of countries referred to in Article 126(2)(a) of Regulation (EU) 2017/625).

Article 5 of Regulation (EU) 2019/625 requires that products of animal origin for which requirements are laid down in Annex III to Regulation (EC) 853/2004 ([5]), enter the Union only from listed establishments in compliance with the EU rules. (List of establishments that is drawn up and kept up-to-date in accordance with Article 127(3)(e)(ii) and (iii) of Regulation (EU) 2017/625.)

In accordance with the new animal health rules applicable from 21 April 2021, for those countries which are not authorised to export fresh meat to the Union, the treatments to be applied to casings from bovine, ovine, caprine and porcine animals are those defined in the opinion ([6]) of the European Food Safety Authority (EFSA) and that of the World Organisation for Animal Health (OIE) – (NaCl or mix of salts for 30 days at 20°C or above).

The current treatment of 30 days salting or bleaching or drying will still apply to all other species (horse, poultry, etc). Only those casings which have undergone these treatments will be allowed to enter into the EU.

As regards public health rules, exporting countries shall be listed by a Commission act. Furthermore, the establishments producing casings must be in compliance with the hygiene requirements provided for in Regulation (EC) Nos 852/2004 ([7]) and 853/2004.

([1]) Official Journal of the European Union (OJ) L 285, 1.11.2003, p. 38
([2]) OJ, L 95, 7.4.2017, p. 1
([3]) OJ. L 84, 31.3.2016, p.1
([4]) OJ, L 131, 17.5.2019, p. 18
([5]) 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 OJ L 139, 30.4.2004, p. 55–205
([6]) https://efsa.onlinelibrary.wiley.com/doi/pdf/10.2903/j.efsa.2012.2820
([7]) Regulation (EC) No 852/2004 of the European Parliament and of the Council of 29 April 2004 on the hygiene of foodstuffs OJ L 139, 30.4.2004, p. 1–54

As a result of the changes in public health legislation, as from 21 April 2021, only countries already authorised for meat products and treated stomachs, bladders and intestines for human consumption by Decision 2007/777/EC will be allowed to export casings to the EU, under the condition that they offer a number of casings-specific guarantees. Countries would be authorised to export casings no matter if they currently have authorised establishments listed in TRACES for casings or not.

IMPORT CERTIFICATE

A specific import certificate will have to accompany the batches of casings destined to the EU. This certificate will include attestations on animal health, public health and residues (see below). It shall apply from 21 April 2021.

New requirements were presented to stakeholders on 25 June 2020, third countries were informed in writing on 8 July 2020.

RESIDUE MONITORING

Risks of residues of veterinary medicinal products following treatment of animals are very low in casings. The main risks of residues from pharmacologically active substances are possibly linked to treatment of casings to avoid spoilage by bacteria.

Based on an analysis of past RASFF notifications, the vast majority of non-compliances was linked to the presence of residues of chloramphenicol and nitrofurans (banned for use in food-producing animals in the EU).

In order to mitigate the risk posed by the presence of antimicrobial residues in casings which have been found in consignments tested at entry to the EU, the Commission has decided that guarantees on the residues status of casings will be required as a condition for their entry into the EU and that third countries will have to be approved and listed as such.

Third country shall submit evidence of residue monitoring for casings:

- monitoring should cover only those substances which are banned from use in food-producing animals in the EU (listed in Table 2 of Regulation (EU) No 37/2010);
- samples may be drawn from casings if treated with dry salt, or if treated with brine, from casings or brine
    - if brine is sampled, traceability to casings should be ensured,
    - samples must be taken from the final product (and in any case, not before the salting/curing step);
- proportionate sampling rate should be one sample per 300 tonnes production, with a minimum of five samples for production of less than 1,500 tonnes.

The guarantees provided by third countries must have an effect at least equivalent to those provided by the Member States. Therefore, the MSs shall include sampling of casings into their national residue monitoring plans, for 2021 plan for the first time.