

Department of Agriculture, Food and the Marine

Trader Notice MH No. 07/2023

To: All operators of DAFM-approved Slaughter Plants

Subject: HACCP-based Residue Monitoring

Background

The Self-Monitoring Plan for Residues operated by Food Business Operators and approved by DAFM ceased at the end of 2022.

In order to fulfil the requirements of HACCP under Article 5.2(a) of [EU Regulation 852/2004](#), Food Business Operators (FBOs) are required to consider chemical hazards in their hazard analysis.

The purpose of a HACCP-based Residue Monitoring Plan is to protect consumers from hazards in foods of animal origin. It also gives primary processors a means to satisfy themselves that animals presented for processing do not contain illegal substances, or veterinary medicinal drugs.

HACCP-based Residue Monitoring Plans will also be intrinsic to establishing and maintaining export markets.

Scope

This Trader Notice covers HACCP-based residue monitoring including incorporation into the HACCP Plan, carcass sampling and testing, and actions to be taken in the event of positive results.

Role of the Food Business Operator (FBO)

FBOs should include chemical residues among the hazards that are considered in their HACCP Plan, along these lines:

Process Step	B: Biological hazard C: Chemical hazard P: Physical hazard A: Allergen hazard	Control measures/monitoring	CCP Y/N
Animal Intake	C: Presence of any chemical substance which may render their meat unfit for human consumption, e.g., residues of veterinary medicinal products	Carcass Residue Monitoring	??

As it is unlikely to be designated as a CCP, the control measure (sampling) for carcass residue monitoring should be designated as a pre-requisite programme.

The FBO should draw up an SOP for Residue Monitoring that is similar to their 2022 Self-Monitoring Plan. This means that it should consist of:

a. Sample numbers and carcase selection

- The number of samples may be lower than that taken under the Self-Monitoring Plan.
- The Residues that are suggested to be sampled for each species should at least include:

▪ **Bovine:**

Residues	Analytes	Suggested Ratio
Group A (Anabolics and Unauthorised Substances)	Trenbolone	12.5%
	Beta Agonists	12.5%
Group B (Veterinary drugs)	Antibiotics	65.0%
	Anthelmintics	10.0%

• **Porcine**

Residues	Analytes	Suggested Ratio
Group A (Unauthorised Substances)	Chloramphenicol	20%
Group B (Veterinary drugs)	Antibiotics	70%
	Sedatives	10%

• **Ovine**

Residues	Analytes	Suggested Ratio
Group B (Veterinary drugs)	Antibiotics	65%
	Anthelmintics	30%
	Coccidiostats	5%

• **Equine**

Equine	Analytes	Breakdown	Suggested Ratio
Group B (Veterinary drugs)	Antibiotics	Tetracyclines Quinolones Penicillins Macrolides Cephalosporins Sulphonamides Aminoglycosides	33%
	NSAIDs	Phenylbutazone Oxyphenylbutazone	66%

• **Poultry**

Residues	Analytes	Suggested Ratio
Group B (Veterinary drugs)	Antibiotics	50%
	Anticoccidials	50%

- The suggested ratios above may vary slightly in individual plants
- Samples should ideally reflect the profile of the kill at the plant and represent the type of animal presented for slaughter.

- Carcase Selection should take into account the following minimum criteria (where relevant to the species slaughtered):
 - sex, age, species & fattening system,
 - all available background information,
 - any evidence of misuse or abuse of substances, and
 - range and level of use of veterinary drugs

b. Laboratory requirements

- The SOP should state the laboratory that will be used for each residue type and whether the results will be screening only or if the laboratory can provide a confirmation service.
- Note: Screen-positive residue results that cannot be confirmed will be regarded as confirmed positive.

c. Procedures for taking each type (matrix) of sample, recording, labelling, packaging, storage, and dispatch to the laboratory

- The SOP should describe the procedures for taking different sample types including who is responsible for taking samples.
 - Urine
 - Muscle
 - Liver/Kidney
- The SOP should state the number of samples to take each week the plant is slaughtering, and that sampling will be carried out randomly where possible
- The SOP should describe:
 - i. what size sample is required in each case;
 - ii. how they are to be collected e.g., in suitable containers to ensure sample integrity and traceability;
 - iii. all measures taken to prevent substitution, interference, cross-contamination, and degradation;
 - iv. how a log of samples taken is maintained and the need for recording in the log at the time of sampling;

d. Receipt and Recording of Results

- Describe the receipt and recording of results in the SOP.

e. Interpretation of Lab Results & Action on Receipt of Screening or Confirmed Positive Result

- The laboratory results interpretation and actions in the case of screen or confirmed positives are tabulated below for each species as follows:
 - [Annex 1](#) – Bovine
 - [Annex 2](#) – Porcine
 - [Annex 3](#) – Ovine
 - [Annex 4](#) – Equine
 - [Annex 5](#) – Poultry
- The action to be taken in the case of a positive result should be referred to in the FBO's HACCP Plan and detailed in their SOP for Residue Monitoring.
- The SOP must describe the difference between a screen positive and a confirmed positive result.

- Where there is
 - Any screen positive result,
 - The outcome of confirmatory testing on a screen positive sample, or
 - A confirmed positive result,
The result must be *notified within 24 hours* to the Veterinary Inspector in Charge of the FBO, providing the following details: :
 - the original result on the Laboratory Report (with details of accreditation)
 - the name, address, and herd/flock number of the owner/keeper of the animal.
- Where there is a *confirmed* positive result, the result must also be notified within 24 hours to Veterinary Medicines Section, Backweston by e-mail to veterinary.residues@agriculture.gov.ie , providing the details above.
- It is not mandatory to detain carcasses sampled under a HACCP-based monitoring plan. However, some Third Countries, such as the US require the exclusion of any carcasses sampled under NRCP or FBO sampling plans, even if the results are negative.
- If carcasses are not detained and a confirmed positive is disclosed, a Risk Assessment may be carried out and a decision on whether to carry out a recall/withdraw or otherwise made.
- As with all HACCP based procedures, the FBO is expected to carry out corrective and preventative actions that will reduce the risk of a recurrence of residues in meat. These actions should include **targeted resampling** of the herd/flock involved in the positive result. The rate and duration of resampling should be decided by the FBO based on risk assessment.

f. Monitoring and Verification

As with all pre-requisite programmes, FBOs will be expected to include in their SOP the procedures that are adopted for

1. monitoring that the SOP on residue sampling is implemented as planned and
2. verifying that the SOP is effective at achieving its purpose.

Records of monitoring and verification should be available to DAFM staff for inspection.

Meat Hygiene Section

June 2023

Annex 1

Laboratory results Interpretation Table for Bovine Residues

Group B Substance	Type of test	Outcome	Interpretation	Action to be taken by FBO
Antibiotic / Anthelmintic	Screen	Negative	Negative	File
	Screen	Positive	Arrange confirmatory test via agreed laboratory contract	Notify VI Carry out actions and follow up as per FBO SOP
Specific named Antibiotic / Anthelmintic	Confirmatory	Negative i.e. readings below MRL	Negative	File Notify VI
	Confirmatory	Reading at any level above the MRL	Confirm interpretation with Veterinary Medicines by forwarding result.	Notify VI and Vet Medicines Carry out actions and follow up as per FBO SOP
Group A Substance	Type of test	Outcome	Interpretation	Action to be taken by FBO
Trenbolone / Beta agonist	Screen	Negative	Negative	File
Trenbolone / Beta agonist	Screen	Positive	Testing lab to hold sample	Notify VI
Trenbolone / Beta agonist	Confirmatory	Reading at any level	A result which indicates presence is positive	Notify VI and Vet Medicines

Annex 2

Laboratory results Interpretation Table for Porcine Residues

Group B Substance	Type of test	Outcome	Interpretation	Action to be taken by FBO
Antibiotic / Sedative	Screen	Negative	Negative	File
	Screen	Positive	Arrange confirmatory test via agreed laboratory contract	Notify VI Carry out actions and follow up as per FBO SOP
Specific named Antibiotic / Sedative	Confirmatory	Negative	Negative	File Notify VI
	Confirmatory	Reading at any level	Confirm interpretation with Veterinary Medicines by forwarding result.	Notify VI and Vet Medicines Carry out actions and follow up as per FBO SOP
Group A Substance	Type of test	Outcome	Interpretation	Action to be taken by FBO
Chloramphenicol	Screen	Negative	Negative	File
Chloramphenicol	Screen	Positive	Testing lab to hold sample	Notify VI
Chloramphenicol	Confirmatory	Reading at any level	A result which indicates presence is positive	Notify VI and Vet Medicines

Annex 3

Laboratory results Interpretation Table for Ovine Residues

Group B Substance	Type of test	Outcome	Interpretation	Action to be taken by FBO
Antibiotic / Anthelmintic / Coccidiostat	Screen	Negative	Negative	File
	Screen	Positive	Arrange confirmatory test via agreed laboratory contract	Notify VI Carry out actions and follow up as per FBO SOP
Specific named Antibiotic / Anthelmintic / Coccidiostat	Confirmatory	Negative	Negative	File Notify VI
	Confirmatory	Reading at any level	Confirm interpretation with Veterinary Medicines by forwarding result.	Notify VI and Vet Medicines Carry out actions and follow up as per FBO SOP

Annex 4

Laboratory results Interpretation Table for Equine Residues

Group B Substance	Type of test	Outcome	Interpretation	Action to be taken by FBO
Antibiotic / NSAID	Screen	Negative	Negative	File
	Screen	Positive	Arrange confirmatory test via agreed laboratory contract	Notify VI Carry out actions and follow up as per FBO SOP
Specific named Antibiotic / NSAID	Confirmatory	Negative	Negative	File Notify VI
	Confirmatory	Reading at any level	Confirm interpretation with Veterinary Medicines by forwarding result.	Notify VI and Vet Medicines Carry out actions and follow up as per FBO SOP

Annex 5

Laboratory results Interpretation Table for Poultry Residues

Group B Substance	Type of test	Outcome	Interpretation	Action to be taken by FBO
Antibiotic / Anticoccidial	Screen	Negative	Negative	File
	Screen	Positive	Arrange confirmatory test via agreed laboratory contract	Notify VI Carry out actions and follow up as per FBO SOP
Specific named Antibiotic / Anticoccidial	Confirmatory	Negative	Negative	File Notify VI
	Confirmatory	Reading at any level	Confirm interpretation with Veterinary Medicines by forwarding result.	Notify VI and Vet Medicines Carry out actions and follow up as per FBO SOP