

**Department of Agriculture, Food and the Marine
Trader Notice MH1/2017**

**To: Food Business Operators at Slaughter and Cutting Establishments Approved by the
Minister for Agriculture, Food and the Marine**

**Harvesting/production of New Products of Animal Origin and the Use of Alternative Systems in the
Production of Products of Animal Origin**

Background

[Regulation \(EC\) No 853/2004](#) describes the requirements for the production of foods of animal origin. The processes and procedures required by the regulation are regarded as standard or conventional. Occasionally, Food Business Operators (FBOs) have a business need to harvest or produce a new product, or to process an existing product in an alternative way which has an equivalent outcome to conventional methods.

Scope

This Trader Notice applies to:

1. Harvesting/production of new products of animal origin, and
2. The use of alternative systems for producing products of animal origin

Role of the FBO

The FBO has an obligation to comply with EU Regulations at all times in order to produce safe food.

If an FBO in a DAFM approved slaughtering/cutting plant wishes to harvest/produce a new product, or process a new or existing product in an alternative way, both the Veterinary Inspector (VI)-in-charge and the RSVI must be notified before production commences.

- **Harvesting/production of a new product of animal origin**

Harvesting/production of new products of animal origin may require an additional approval to be added to the establishment's current approval. In this case, the FBO must use the procedures detailed in the [DAFM Approved Establishments](#) page of this Department's website.

Notwithstanding any establishment approval amendments, the FBO must also:

- Provide detailed premises structural plans (where necessary.)
- Draft relevant Process Flow Diagrams.
- Draft Standard Operating Procedures.
- Draft Hazard Analysis and HACCP Plan.
- Draft Microbiological sampling plans (where appropriate)
- Comply with any other requirements considered necessary by VI or RSVI.

Only when all the requirements are in place and approved may the FBO commence harvesting/production of a new product of animal origin.

- **Use of alternative systems in the production of products of animal origin**

Regulation (EC) No 853/2004 allows for the use of alternative systems provided the alternative systems give an equivalent outcome to "conventional" systems.

One example of an alternative system is the packing of offal of domestic ungulates at a temperature higher than 3°C.

FBOs must notify the VI-in-charge of their intention to use an alternative system and are not permitted to commence using an alternative system without prior approval from DAFM.

The onus is on the FBO to prove that using an alternative system can produce an equivalent outcome to the conventional system.

Before commencing production using an alternative system, the FBO must:

1. Apply to DAFM for permission to use an alternative system .
2. Present structural plans (if necessary) for the alternative system.
3. Draft an SOP for validation of the alternative system (to prove that it can achieve an equivalent outcome).
4. Draft a Process Flow Diagram.
5. Draft an SOP for the process.
6. Draft Hazard Analysis and HACCP plan for the procedure.
7. Draft a microbiological sampling plan for the product (where appropriate).
8. Comply with any other requirements of the VI or RSVI.

If the FBO has already commenced using an alternative system without formal approval they must immediately go through the steps above (including validation) to obtain formal approval

Enforcement Action

The VI and RSVI are authorised to take effective, proportionate and dissuasive enforcement action if the FBO proceeds to harvest/produce new products without approval, or commences using alternative systems without prior approval and validation.

Meat Hygiene Division
9th January 2017