



Origin-traceability, legislative compliance and certification of natural sausage casings eligible for export to the Customs Union (Russian Federation, Kazakhstan, Belarus)

PREFACE

The European Natural Sausage Casings Association (ENSCA) welcomes the opportunity to issue this industry guide for the origin-traceability, legislative compliance and certification of natural sausage casings eligible for export to the Customs Union (Russian Federation, Kazakhstan, Belarus).

This document is specifically intended for the European natural sausage casing industry and its international partners involved in processing and selection and grading activities outside the EU.

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INTRODUCTION

1.1 Objectives

The first objective of this procedure is to define natural sausage casings as a processed and treated product, providing a clear segregation from fresh meat and related sanitary requirements.

The second objective is to describe all product flows generating natural sausage casings eligible for export to a specific market.

The third objective is to ensure that the origin remains linked to each individual batch of natural sausage casings during each processing step prior to final export to a specific market.

The fourth objective is to provide clear guidance for company-based control of relevant export requirements.

The fifth objective is to ensure full compliance with the export requirements as stated on the Veterinary Certificate for animal casings exported from the EU into the CU.

1.2 Scope

In order to meet these objectives, the product flow and traceability at specific processing steps of the natural casings eligible for the CU market are described, based on a clear definition of the product and its low-risk status in regards to animal and public health risks. In addition, several points (including documentation, auditing and verification procedures, control parameters and frequency) are listed as guidance for company-based control and supervision by the competent authorities.

Specific community legislation dealing with traceability relevant to the natural sausage casing industry consists of:

- Regulation (EC) No 178/2002 laying down the general principles and requirements of food legislation;
- Regulation (EC) No 931/2011 on the traceability requirements set by Regulation (EC) No 178/2002 of the European Parliament and of the Council for food of animal origin;
- Regulation (EC) No 852/2004 on the hygiene of foodstuffs;
- Regulation (EC) No 853/2004 laying down specific hygiene rules for food of animal origin;

- Regulation (EC) No 854/2004 laying down specific rules for the organisation of official controls on products of animal origin intended for human consumption;
- Regulation (EC) No 882/2004 on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules;
- Regulation (EC) No 999/2001 laying down the rules for the prevention, control and eradication of certain transmissible spongiform encephalopathies;
- Council Directive 1998/83/EC, on the quality of water intended for human consumption.

Specific community legislation should be considered for the trade in natural sausage casings:

- Council Directive 92/118/EEC, laying down animal health and public health requirements governing trade in and imports into the Community of products not subject to the said requirements laid down in specific Community rules referred to in Annex A (I) to Directive 89/662/EEC and, as regards pathogens, to Directive 90/425/EEC;
- Commission Decision 2003/779/EC, laying down animal health requirements and the veterinary certification for the import of animal casings from third countries.

DEFINITIONS

1.3 *Definition of natural (sausage) casings:*

"Natural casings are used in sausage production (and similar products referred to in section 1601 of the TARIC code), are derived from the intestinal tract or bladders of farm animals, have been scraped and cleaned and have been treated with salt (NaCl) or dried after cleaning".

Additional comments to the definition:

- Farmed animals comprise of pigs (*Sus scrofa*), sheep (*Ovis aries*), goats (*Capra hircus*), cattle (*Bos taurus*, *Bos indicus*) and horses (*Equus caballus*);
- Natural casings are derived from farmed animals found fit for human consumption following ante-mortem and post-mortem inspection;
- Specific comments made to this definition in the ENSCA Community Guide to Good Practice for Hygiene and the application of the HACCP principles for the production of natural sausage casings (2012) remain in effect;
- The relevant CN code 0504 00 00, used for the international trade in natural casings, is described as: *Guts, bladders and stomachs of animals (other than fish), whole and pieces thereof, fresh, chilled, frozen, salted, in brine, dried or smoked*;
- Natural casings are a distinctly different product and cannot be compared with fresh meat / meat products. Any sanitary or trade requirement applicable to natural casings should be determined specifically for this product.

1.4 *Additional descriptions of natural casings:*

- Natural casings – finished product: scraped, cleaned, salted or dried after cleaning, selected and graded, ready for sausage production. Most natural casings traded are available in this product description;
- Natural casings – semi-finished product: scraped, cleaned, salted or dried after cleaning. Although the same animal and public health criteria are met as the finished product description, these goods still require selection and grading steps in order to meet the technical requirements of industrial sausage production.

2. TRACEABILITY AT SPECIFIC PROCESSING STEPS

2.1 Product flow

Possible flows (non-exhaustive):

1. EU slaughterhouse [raw intestinal material / semi-finished product] → EU casing company [finished product] → Customer in EU or export market;
2. EU slaughterhouse [raw intestinal material] → EU casing company [semi-finished product] → EU casing company [finished product] → Customer in EU or export market;
3. EU slaughterhouse [raw intestinal material] → EU casing company [semi-finished product] → EU casing company [finished product] → non-EU casing company [finished product] → Customer in EU or export market;
4. Non-EU casing company [finished product] → EU casing company [finished product] → Customer in EU or export market (outside EU / not common, but possible product flow due to international market demands).

2.2 European establishment – first reception

All specific processing steps relevant to the traceability of the goods, starting with the reception from a slaughterhouse up until shipment to a destination outside the EU and specific export market are described in more detail below.

All personnel handling these natural casings at any described processing step is aware of the special status of these goods and will act in a manner to ensure full traceability.

The critical components in the described traceability system are:

1. Labelling of the individual container,
2. Clear marking of the products eligible for a specific market, and
3. A comprehensive documentation system.

The key element in the label information is the lot number, as this is a unique number generated for each individual container (e.g. cask, E2 crate, dolav).

2.2.1 Reception from EU slaughterhouse

All natural casings received from any EU slaughterhouse are packed in containers in a way that meet all hygienic requirements. Upon reception, each individual container is given a label showing at least the following information:

- Product description
- Identification number
- Date of production
- EC identification mark receiving establishment
- Quantity on hand in container
- Identification mark indicating eligibility for export to a specific market.

2.2.2 Processing and storage

In general, all natural casings received are cleaned, scraped and salted, done at the slaughterhouse from where the goods were received. However, in case any processing is required (e.g. extra salting step) this is being done in a way to ensure full segregation in time or place from any other goods present in the establishment. If the goods are taken from their original container, the new container in which they are finally placed will again bear a label showing the information as described under 2.2.1.

Storage of natural casings is done in a way that ensures proper identification of these goods and segregation of goods eligible for a specific export market from other stored products.

2.2.3 Shipment to an EU approved casing establishment outside EU

An official veterinary certificate is completed and issued, accompanied by a packing list detailing all information related to the containers with natural casings eligible for a specific market. The status of each container per shipment can be identified visibly from its label information.

If these containers are relabelled prior to export, the new label will show at least the following information:

- Product description
- Identification number
- EC identification mark exporting establishment
- Quantity on hand in container
- Identification mark indicating eligibility for export to a specific market.

2.2.4 Documentation

The physical or digital availability of any document pertaining to the actual origin and therefore correct identification of the product is of great importance for the continuing traceability of the origin. Any relevant document therefore accompanies

each shipment physically or remains digitally available in the company's enterprise resource planning system.

All issued reference numbers to veterinary certificates or other official documents are recorded in a separate overview linked to the different lot numbers in each shipment. This way a complete overview becomes available for each individual lot eligible for export to a specific market, detailing all reference numbers of any official document relevant to the origin of the goods.

2.3 EU approved establishment in countries outside EU

All EU legislation applicable to the European casing industry or its national equivalent is applicable to any EU approved establishment in countries located outside the EU.

2.3.1 Reception from European establishment

All natural casings eligible for a specific, non-EU market received from a European establishment arrive in closed containers, properly labelled and accompanied by the relevant document identifying their special status. The original label bearing the identification mark of the exporting European establishment will remain intact on the container until it is opened for further processing.

As the identification mark of the exporting European establishment can be applied to either the individual container or wrapping covering multiple containers per transport pallet, the correct identification mark of the receiving establishment must be applied to the individual container in case the wrapping is removed.

When these containers are therefore relabelled, the new label will show at least the following information:

- Product description
- Identification number
- Identification mark receiving establishment
- Quantity on hand in container
- Identification mark indicating eligibility for export to a specific market.

2.3.2 Processing and storage

In order to establish full traceability and segregation in time and place of the natural casings eligible for a specific market, all processing is done in areas (e.g. workshop) designated for this purpose and handled by qualified personnel.

A detailed description on how the segregation in time and place is handled by the individual processing establishment (including but not limited to workshop

identification, product flow, personnel flow, production register, checklists) is available at company level. Onsite verification of this step in the procedure is advisable.

The natural casings are desalinated, graded and selected, salted, bundled and packed according to approved company procedures, in line with the ENSCA Community Guide to Good Practice (cGGP) for Hygiene and the application of the HACCP principles in the production of natural sausage casings (also available in Chinese).

In accordance to the afore-mentioned ENSCA cGGP, natural casings are required to be salted with NaCl (dry salt or saturated brine) during a continuous period of at least 30 days before they are dispatched to sausage producers. This 30-day period can start as soon as the natural casings are salted at an EU-based cleaning operation and can include any storage or transport period before being finally shipped to the sausage producers.

To simplify the situation, the final salting step at the processing establishment must be recorded and mentioned on the label.

After packing these containers are labelled showing at least the following information:

- Product description
- Identification number
- Date of salting
- Identification mark processing establishment
- Quantity on hand in container
- Identification mark indicating eligibility for export to a specific market.

The separate overview (product history) linked to this identification (ID) number shows all original ID numbers related to the natural casings that were processed and subsequently combined to make a uniform product and packed in the same container. It is therefore very well possible that different ID numbers of finished goods (after grading and selection) refer to the same original ID numbers. However, the actual product description per container will differ as more than one finished product can be based on the same starting material due to specific differences per strand of casing (e.g. length, calibre, quality).

Storage of natural casings is done in a way that ensures proper identification of these goods and segregation of goods eligible for a specific export market from other stored products.

2.3.3 Shipment to a European casing establishment

An official veterinary certificate is completed and issued, accompanied by a packing list detailing all information related to the containers with natural casings eligible for a specific market. The status of each container per shipment can be identified visibly from its label information.

If these containers are relabelled prior to export, the new label will show at least the following information:

- Product description
- Identification number
- Date of salting
- Identification mark exporting establishment
- Quantity on hand in container
- Identification mark indicating eligibility for export to a specific market.

2.4 European establishment - second reception

2.4.1 Reception from an EU approved establishment outside the EU

All natural casings eligible for a specific, non-EU market received from an EU approved establishment in countries outside the EU arrive in closed containers, properly labelled and accompanied by the relevant document identifying their special status.

If these containers are relabelled, the new label will show at least the following information:

- Product description
- Identification number
- Date of salting
- EC identification mark receiving establishment
- Quantity on hand in container
- Identification mark indicating eligibility for export to a specific market.

2.4.2 Processing and storage

All natural casings eligible for a specific, non-EU market received for the second time by the European casing establishment have been processed into uniform finished goods and will either be shipped to their next destination outside the EU in their original container (e.g. 300-liter cask) or may be repacked into smaller containers (e.g. 25-liter bucket), in order to meet the customer demands.

This repacking is being done in a way to ensure full segregation in time or place from any other goods present in the establishment. The new container in which they are finally placed will again bear a label showing the information as described under 2.4.1.

Storage of natural casings is done in a way that ensures proper identification of these goods and segregation of goods eligible for a specific export market from other stored products.

2.4.3 Shipment to a non-EU casing establishment for further processing and marketing in that particular country

An official veterinary certificate is completed and issued, accompanied by a packing list detailing all information related to the containers with natural casings eligible for that intended market. The status of each container per shipment can be identified visibly from its label information.

If these containers are relabelled prior to export, the new label will show at least the following information:

- Product description
- Identification number
- Date of salting
- EC identification mark exporting establishment
- Quantity on hand in container
- Identification mark indicating eligibility for export that market.

2.5 Specific export conditions

The following paragraphs describe specific eligibility conditions to be complied with according to the requirements of specific export markets, such as the CU between the Russian Federation, Belarus and Kazakhstan.

2.5.1 Identification mark CU market

A uniform identification mark indicating eligibility for export to the CU market will be used on any container with natural casings designated for this market.

The mark must be legible and indelible and the characters easily decipherable. It must be clearly displayed for the competent authorities. The mark must be square in shape and include the following text: PRODUCT ELIGIBLE FOR CU MARKET.

2.5.2 Sampling instructions

2.5.2.1 Microbiological and chemical testing

The following parameters, limits and testing frequency will be observed:

Product	Parameter	Maximum limit	Testing frequency	Reference method
	Microbiological parameters (CFU/g)¹			
natural casings	Total aerobic count	5.0 x 10 ⁶	4x / year	ISO 4833
	Enterobacteriaceae	1.0 x 10 ⁴	4x / year	ISO 21528-2
	Coagulase-positive <i>Staphylococcus aureus</i>	1.0 x 10 ³	4x / year	ISO 6888-1
	Sulphite reducing <i>Clostridium</i> -spores	1.0 x 10 ³	4x / year	ISO 15213
	<i>Salmonella</i> spp	Absent in 25 g	4x / year	ISO 6579
	Radio nucleotides			
	Caesium 137	200 Bq / kg	1x / year	
	Toxic elements			
	Lead	0.5 mg / kg	1x / year	
	Arsenic	0.1 mg / kg	1x / year	
	Cadmium	0.05 mg / kg	1x / year	
	Mercury	0.03 mg / kg	1x / year	
	Antibiotics			
	Chloramphenicol	Not allowed / < 0.0003 mg / kg	1x / year	
	Tetracyclines	Not allowed < 0.01 mg / kg	1x / year	
Bacitracin	Not allowed < 0.02 mg / kg	1x / year		
	0.001 µg / kg (porcine)	1x / year		

CFU = Colony Forming Units

¹ Microbiological limits in accordance to the ENSCA Community Guide to Good Practice for hygiene and the application of the HACCP principles in the production of natural sausage casings

Limits based on the following studies:

- Wirth, F., 1990. Microbiological investigation of natural casings. Invest. No. 60-81. Federal Office for Meat Research, Institute for Technology, Kulmbach.
- Wirth, F., 1994. Microbiological investigation of natural casings. Invest. No. 34-55. Federal Office for Meat Research, Institute for Technology, Kulmbach.
- Wijnker, J.J., Koop, G., Lipman, L.J.A, 2006. Antimicrobial properties of salt (NaCl) used for the preservation of natural casings. Food Microbiology, 23, 657-662.

Product	Parameter	Maximum limit	Testing frequency	Reference method
Natural casings	Pesticides			
	Hexachlorocyclohexane (α , β , γ - isomer)	0.1 mg / kg	1x / year	
	DDT and metabolites	0.1 mg / kg	1x / year	
	Dioxin	0.003 μ g / kg (bovine / ovine)	1x / year	
		0.001 μ g / kg (porcine)	1x / year	

All chemical testing parameters and applied maximum limits are based on the Decision of the Customs Union Commission No. 299 dated 28 May, 2010 - Uniform sanitary and epidemiological and hygienic requirements for products subject to sanitary and epidemiological supervision (control).

2.5.3 Hygiene and application of HACCP

The ENSCA Guide to Good Practice for hygiene and the application of the HACCP principles in the production of natural sausage casings is implemented and followed in full by each European establishment eligible for the export of natural casings to the CU.

2.5.4 Validation and verification of company-based control system

Each establishment interested in the export of natural casings to the CU will require a validation of its company-based control system. This validation will be done via a one-time systems audit performed by an independent, approved expert from the Customs Union. After validation of the company-based system, ensuring all export requirements are met, an annual verification of the required export standard to the CU can be incorporated in the audits regularly performed by the national competent authorities. The approved establishment remains responsible for updating its company-based system and thus full compliance with all requirements for the export of natural casings to the CU.

2.6 Verification

Verifications of this procedure are carried out regularly by the food business operators and are documented. The Competent Veterinary Service should have full access to the necessary information when they carry out official controls on traceability systems, including the outcome of the verifications, which were carried out regularly.

3. NATIONAL COMPETENT AUTHORITIES

3.1 Supervision and certification

Supervision of the company-based control system is handled by the national competent authorities and verified via regular audits. Based on a positive outcome of these audits, an establishment is / remains approved for the export to the CU.

For the certification of shipments containing natural casings intended for the CU market, the official veterinarian issuing these health certificates may rely on the validity of the approval for the export to the CU, based on the establishment's audit report.

Verification of the validity date of the audit report is sufficient to commence the certification procedure. In addition, the company's visitors record should reflect (name, time and date) the presence of the official veterinarian on the day the health certificates are issued.



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