



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR HEALTH AND FOOD SAFETY

Health and food audits and analysis

DG(SANTE) 2017-6274

**FINAL REPORT OF AN AUDIT
CARRIED OUT IN
INDIA
FROM 23 OCTOBER 2017 TO 27 OCTOBER 2017
IN ORDER TO
EVALUATE THE CONTROL SYSTEMS IN PLACE TO CONTROL
MICROBIOLOGICAL CONTAMINATION IN SEEDS FOR HUMAN CONSUMPTION
INTENDED FOR EXPORT TO THE EUROPEAN UNION**

Executive Summary

This report describes the outcome of an audit carried out by Directorate-General for Health and Food Safety in India from 23 to 27 October 2017.

*The objectives of the audit were to follow-up the recommendations of the most recent audit on the topic carried out in 2014 and to assess the official control systems in place on seeds for human consumption for export into the EU (in particular sesame seeds) and responses to Rapid Alert System for Food and Feed notifications concerning microbiological contamination of seeds and to assess whether these systems offer adequate assurance that the produce concerned is within the limits regarding the contamination with *Salmonella* spp., as laid down in EU legislation.*

*India was selected as part of the Directorate-General for Health and Food Safety's audit programme due to the high number of alert notifications on *Salmonella* spp. contamination in consignments of sesame seeds imported into the EU over the past years.*

The competent authority has addressed all recommendations made in the previous report on this topic satisfactorily. It has made significant progress in improving the control system for sesame seeds intended for EU export, as reflected in a reduction of the number of Rapid Alert System for Food and Feed notifications since the previous audit. In particular the controls on processors and exporters, and the follow-up of Rapid Alert System for Food and Feed notifications has improved. However, the current system cannot verify, due to a lack of traceability to farms, that sesame seeds are produced under conditions which comply with the general hygiene provisions for primary production set out in Part A of Annex I to Regulation (EC) No 852/2004.

The report contains recommendations to India to address the shortcomings identified.

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ABBREVIATIONS AND DEFINITIONS USED IN THIS REPORT

Abbreviation	Explanation
CA	Competent Authority
CODEX	Codex Alimentarius Commission of the Food and Agriculture Organization of the United Nations and World Health Organization
DG Health and Food Safety	Directorate-General for Health and Food Safety of the European Commission
EU	European Union
FBO	Food Business Operator
FNAO	Food of Non Animal Origin
GAP	Good Agricultural Practices
IOPEPC	Indian Oilseeds and Produce Export Promotion Council
RASFF	Rapid Alert System for Food and Feed

1 INTRODUCTION

This audit took place in India from 23 to 27 October 2017 to assess the official control systems in place to control microbiological contamination in seeds for human consumption (in particular, *Salmonella spp.* contamination of sesame seeds) intended for export into the European Union (EU). The audit team comprised two auditors from the Directorate-General for Health and Food Safety (DG Health and Food Safety).

The audit was undertaken as part of DG Health and Food Safety's annual audit programme. The audit team was accompanied throughout the audit by representatives of the competent authority (CA), the Indian Oilseeds and Produce Export Promotion Council (IOPEPC).

The opening meeting was held on 23 October 2017 with representatives of IOPEPC, the Agricultural and Processed Food Products Export Development Authority and the Export Inspection Council. During the meeting, the objectives of the audit, itinerary and the standard reporting procedures were confirmed.

2 OBJECTIVES

The objectives of the audit were:

- To assess the official control systems in place on seeds for human consumption for export into the EU (in particular sesame seeds) and associated notifications and responses to Rapid Alert System for Food and Feed (RASFF) to prevent microbiological contamination and assess whether these systems offer adequate assurance that the produce concerned is within the limits regarding the contamination with *Salmonella spp.*, as laid down in EU legislation.
- To follow-up the recommendations of audit DG(SANCO) 2014-7170.

In terms of scope, the audit reviewed the controls on production, processing and export, including national legislation in place, the organisation and operation of the CA and its controls over Food Business Operators' (FBOs) compliance with hygiene rules.

Table 1: Audit visits and meetings

Meetings/visits	Comments	
Competent authorities		
Central	3	Opening meeting, closing meeting and information meeting
Processors /Exporters/Farms		
Processors/Packers/Exporters	3	Two visits to processors/exporters and meeting with four exporters involved in RASFF notifications
Market (Mandi)	1	Trading place for, inter alia, sesame seeds
Farms producing sesame seeds	3	One farm visited and meetings with two farmers

3 LEGAL BASIS

3.1 LEGAL BASIS

The audit was carried out under the general provisions of EU legislation, in particular, Article 46 of Regulation (EC) No 882/2004 of the European Parliament and the Council which stipulates that EU controls in non-EU countries may verify compliance or equivalence of non-EU country legislation and systems with EU food and feed law. These controls shall have particular regard to the assurances which the non-EU country can give regarding compliance with, or equivalence to the relevant EU requirements.

A full list of the EU legal instruments referred to in this report is provided in Annex 1. EU legal acts quoted in this report refer, where applicable, to the most recently amended version.

3.2 STANDARDS

Additionally, the Guidelines and Codes of Practice of the Codex Alimentarius Commission of the Food and Agriculture Organisation of the United Nations and World Health Organisation (CODEX) were taken into account in the context of the audit, where relevant.

A full list of applicable standards referred to in this report is provided in Annex 2. Reference to specific provisions of these texts is provided at the beginning of relevant sections.

4 BACKGROUND

Food of Non Animal Origin (FNAO) is consumed in a variety of forms, and a major

component of almost all meals. These food types have the potential to be associated with large outbreaks as seen in May 2011 when a major outbreak of Shiga toxin-producing *Escherichia coli* O104:H4 occurred in Germany. About 4,000 people were reported ill with symptoms and the outbreak resulted in the death of more than 56 people.

From 2008 to 2011 there was an increase in the numbers of reported outbreaks, cases, hospitalisations and deaths associated with food of non-animal origin. These trends occurred together with a decrease in the numbers of reported outbreaks, cases, hospitalisations and deaths associated with food of animal origin.

The European Food Safety Authority concluded in a scientific opinion that the top ranking food/pathogen combination was *Salmonella spp.* and leafy greens eaten raw followed by (in equal rank) *Salmonella spp.* and bulb and stem vegetables, *Salmonella spp.* and tomatoes, *Salmonella spp.* and melons, and pathogenic *Escherichia coli* and fresh pods, legumes or grain. More details can be found at: <http://www.efsa.europa.eu/en/efsajournal/doc/3025.pdf>

In order to ensure an adequate level of protection of public health, it is appropriate that FNAO imported into the EU complies with the requirements laid down in Regulation (EC) No 852/2004.

The last Commission audit on sesame seeds in India took place in December 2014. The audit report highlighted deficiencies in relation to registration of establishments, sampling procedure and follow-up of RASFF notifications. Three recommendations were made, and written guarantees were received in relation to the implementation of actions deemed to address these recommendations.

Since 2 February 2017 sesame seeds from India have been included in Commission Implementing Regulation (EU) 2017/186, laying down specific conditions applicable to the introduction into the EU of consignments from certain third countries due to microbiological contamination and amending Regulation (EC) No 669/2009. The 2017 Regulation requires that each consignment of sesame seeds shall be accompanied by the results of sampling and analysis performed by the CA of India verifying the absence of *Salmonella spp.*. The consignments of sesame seeds shall be accompanied by a health certificate in accordance with the model set out in the Regulation. In this certificate, the CA declares that the sesame seeds have been produced under conditions which comply with Regulation (EC) No 852/2004. Furthermore, sesame seeds from India are subject to a frequency of 20% of physical and identity checks to be carried out on imports at their point of entry into the EU in line with Regulation (EU) 2017/186 to verify potential *Salmonella spp.* contamination.

In view of the large number of RASFF notifications and the volume of imports from India, DG Health and Food Safety decided to undertake an audit in order to assess the control systems in place to control microbiological contamination in FNAO intended for export to the EU.

Table 2: Exports of sesame seeds from India to the EU (source: Indian CA)

Year	Sesame seeds (tons)
2015	71,431
2016	66,872

The CA informed the audit team that between 80 and 90 % of these exports concern hulled sesame seeds (the hulling process is briefly explained in paragraph 29). The other part concerns natural sesame seeds (see paragraph 24).

The table below shows the number of RASFF notifications since 2014. Section 5.6 of this report briefly describes how the CA handles RASFF notifications. The high number of notifications in 2015 can be explained by the increased level of import controls (20% checks) on sesame seeds in line with Regulation (EC) No 669/2009 that entered into force on 1 October 2014. Despite the continuation of these increased controls, the number of notifications decreased in 2016 and 2017.

Table 3: RASFF notifications

	2014	2015	2016	2017 (I-X)
<i>Salmonella spp.</i> in consignments of sesame seeds	23	66	18	13

Of the 120 RASFF notifications since 2014, 76 concerned hulled sesame seeds, 16 concerned natural sesame seeds and for the remaining 28 the type of seeds could not be determined. Taking into account the distribution between the different types exported to the EU, there is no indication that there is a difference in contamination levels with *Salmonella spp.* between hulled and natural sesame seeds.

5 FINDINGS AND CONCLUSIONS

5.1 NATIONAL LEGISLATION

Legal requirements

Article 46(1)(a) of Regulation (EC) No 882/2004 stipulates that EU controls are to have, *inter alia*, particular regard to the legislation of the non-EU countries.

Findings

1. The Food Safety and Standards (Contaminants, Toxins and Residues) Regulation 2011, issued by the Food Safety and Standards Authority of India is the main national legislation for food safety.
2. The Ministry of Commerce & Industry has issued Notification No 37/2015-20 of 3 February 2016, establishing a procedure for export of sesame seeds to the EU.
3. Export of sesame seeds to the EU is permitted, subject to an export certificate from IOPEPC. They issue this certificate within two working days of receiving the request from an exporter, subject to a "certificate of analysis" by a National Accreditation Board for Testing and Calibration Laboratories accredited laboratory, which has to be registered with IOPEPC.
4. The procedure for export of sesame seeds to the EU is set out in the document "Procedure for Control of Contamination of *Salmonella spp.* in Sesame Seeds for Export to EU" which is available on the website: <http://dgft.gov.in/>. IOPEPC is empowered to issue amendments to the procedures, if required.

Conclusions on National Legislation

5. There is national legislation in place regarding export requirements for sesame seeds to be exported to the EU in line with EU requirements.

5.2 COMPETENT AUTHORITIES

Legal requirements

Articles 46(1)(b) and (c) of Regulation (EC) No 882/2004 stipulate that EU controls shall have, *inter alia*, particular regard to the organisation of the non-EU country's CAs and their powers.

Findings

6. Since the last audit a new CA (IOPEPC) has been designated by Notification No 37/2015-20 to issue export certificates for consignments of sesame seeds destined to the EU.
7. IOPEPC is responsible for developing an online system for regulating and monitoring the entire process of export of sesame seeds from India to the EU.
8. IOPEPC has constituted standing committees for dealing with notifications via the RASFF and for any technical issue requiring its consideration. On the basis of the

recommendations of the committees, IOPEPC issues advices and directives to the FBOs concerned for upgrading its infrastructure and/or amends its protocols to meet the requirements of the EU.

9. IOPEPC issues health certificates for sesame seed exports to the EU, as required by Regulation (EU) 2017/186.

Conclusions on Competent Authorities

10. Competent authorities in the context of sesame seeds to be exported to the EU are designated.

5.3 OFFICIAL CONTROLS

Legal requirements

Articles 46(1)(e) and (b) of Regulation (EC) No 882/2004 stipulates that EU controls shall have, *inter alia*, particular regard to the existence and operation of documented control procedures and control systems based on priorities, and the CA's capability to enforce applicable legislation.

Articles 3, 4 and 6 of Regulation (EC) No 852/2004 in connection with its Article 10.

CODEX General principles of food hygiene (CAC/RCP 1-1969).

Findings

5.3.1 Organisation of official controls

11. Official controls on sesame seeds for EU export are the responsibility of IOPEPC. These controls are centrally coordinated and the minimum frequency is once every two years in establishments that are registered for export of sesame seeds to the EU.

5.3.2 Registration of Food Business Operators

12. Exporters, laboratories, sesame processing units and warehouses involved in the sesame seed EU export chain are subject to official registration by IOPEPC. After registration these operators obtain a certificate from IOPEPC.
13. After applying for registration, processors and warehouses are visited by a team of auditors, listed by IOPEPC, to assess compliance with the hygiene requirements as specified in the terms and conditions for registration. These hygiene requirements are based on Regulation (EC) No 852/2004. FBOs should also have a valid license issued by the Food Safety and Standards Authority of India.

14. After every visit, an audit report is produced by the team of auditors. The non-compliances (if any) are communicated to the FBO. After verifying the compliance with various requirements, by receiving written/photographic evidence or a second visit to check the rectification of any non-compliances, IOPEPC issues a certificate of registration to the FBO. The certificate of registration is valid for a period of two years. FBOs without certificate cannot export to the EU.
15. By the time of the audit 70 establishments (involved in processing and export activities) had been registered with IOPEPC for export of sesame seeds to the EU.
16. The audit team was informed that farmers and traders are not yet registered and controlled by the CA. This means that the actions taken to address recommendation No 1 of the last audit report have been partially implemented.

5.3.3 *Cultivation*

17. IOPEPC has prepared brochures and pamphlets in regional languages for farmers in sesame producing states to inform them, inter alia, on how to reduce the risk of microbial contamination. This information is distributed to the farmers by using networks of stakeholders (exporters, processors, brokers, buying agents, laboratories, fumigation agencies, etc.). A brochure was presented to the audit team. It contained guidelines on how to prevent (microbial) contamination.
18. IOPEPC regularly organises awareness programmes for implementation of Good Agricultural Practices (GAP) and Good Manufacturing Practices in sesame producing states. Scientists from agricultural universities, officials of state agriculture departments and food safety experts are invited to inform the farmers and processors with regard to different aspects of GAP. GAP and other related information is disseminated on television channels in national and regional languages. A list of four awareness programmes (one day workshops) conducted between October 2016 and February 2017 was presented to the audit team.
19. The audit team observed the drying of the sesame seed plants in the field after harvest and spoke with three randomly selected growers. The growers informed the audit team that they were aware of the brochures of IOPEPC.
20. The sesame seed plants are harvested by cutting the stem or pulling the plant with intact root from the soil. The second method causes more pollution of the seeds with soil.
21. After drying in the field (for up to 15 days - depending on the weather), manual threshing and collection of the seeds take place. Field toilets and hand washing facilities were not in place in close proximity to the fields.
22. The audit team was informed that the harvested sesame seeds are usually not stored at the farm, but sold at the market place by the farmer, or sold to an intermediary, who sells the harvested produce of groups of farmers at the market.

23. The audit team observed the operations at one market (Mandi). Heaps of sesame seeds were uncovered in the open air, with birds flying around and landing on the heaps. The audit team was informed during the closing meeting that the sesame seed heaps at the market visited had, since the visit, all been covered to avoid contamination from birds. The heaps and bags were marked with handwritten pieces of paper with the names of the farmers or intermediaries. This information was also recorded by hand on "inward slips" for the records of the market. The audit team was informed that these inward slips are usually destroyed after one month, because of legal requirements and high number of slips (see paragraph 26).

5.3.4 Processing and Storage

24. The audit team visited two processors/exporters of sesame seeds. One of these FBOs exported between 2,000 and 3,000 tons to the EU, of which 90% were unprocessed natural seeds i.e. cleaned and sorted and not heat-treated. The operator was licensed by IOPEPC on 22 March 2016 for two years, after an inspection. The FBO was involved in a RASFF notification for presence of *Salmonella spp.*. At the root-cause analysis, carried out by an IOPEPC listed auditor, causes for non-compliances regarding cleaning of equipment, infestation of birds at raw material entrance, and hygiene of staff were recorded. The operator corrected the non-compliances by blocking openings, providing hygiene training to staff, improving the personal hygiene equipment, and by taking swab samples from equipment to verify the absence of pathogens. The corrective actions were checked by the auditor using written and photographic evidence.
25. This FBO was able to trace back the consignments of sesame seeds to the market where the seeds had been purchased. However sesame seeds are not traceable from the exporter to the producing farm.
26. Traceability is verifiable from the exporter to the local market. At the market place handwritten files are available and the market authorities at the time of the audit could trace back some but not all consignments to farmers and farmer groups as intermediaries sell to the market and the farmers do not appear in the files of these middle-men. The market management visited explained to the audit team that in 2018 they aim to introduce a computerised system called e-auction that will have the potential to ensure traceability to the area of production and all farms.
27. Incoming consignments were tested in the FBO's own laboratory with a validated *Salmonella spp.* test kit. Less than 5% of the consignments were found positive. Those that tested positive were used for non-EU markets.
28. The second FBO visited, exported annually to the EU about 2,500 tons of hulled sesame seeds and between 1,000 and 1,200 tons of unprocessed sesame seeds.

29. The hulling process involves washing with hot water, followed by rinsing with cold water and drying with hot air of at least 110°C. At this temperature *Salmonella spp.* contamination should be eliminated within a few seconds. This process was validated for temperature. The seeds reached a temperature of more than 100°C. The process was not validated for its effectiveness in reducing microbial contamination.
30. The CA informed the audit team that they are not aware that any processor of sesame seeds in India, at present, has a validation for the effectiveness of the hulling process regarding the reduction of *Salmonella spp.*
31. Notwithstanding the hulling step, the FBO was involved in a RASFF notification for the presence of *Salmonella spp.* in hulled sesame seeds.
32. The root-cause analysis detected causes of non-compliances in hygiene practices as well as problems with traceability.
33. The hygiene practice was validated by taking swab samples before and after cleaning. A reduction in total bacterial count was observed, however, pathogenic bacteria, including *Salmonella spp.*, were not detected, before and after cleaning.
34. The audit team noted that the procedures, established by IOPEPC for processors and exporters of sesame seeds to the EU, were followed.

5.3.5 Non- Conforming Products

35. The non-conforming products (consignments which fail the test for *Salmonella spp.*) are not allowed for export to EU.
36. Consignments rejected by the EU because of a positive *Salmonella spp.* test result, are returned to India. The audit team was informed that these consignments are treated and exported to non-EU countries.

Conclusions on Official Controls

37. The producers of, and markets for, sesame seeds receive information intended to prevent microbial contamination, however, there are no official controls on the farmers and traders from the point of view of food hygiene. As a result the CA cannot guarantee that these establishments comply with the requirements of Article 4 of Regulation (EC) No 852/2004 in conjunction with Article 10 and Annex I of the same Regulation.
38. Procedures are in place and controlled by the CA to ensure the prevention of microbial contamination at processors and exporters of sesame seeds, however, the validation of the hulling process of sesame seeds to ensure the elimination of *Salmonella spp.* contamination is not part of the controls.

5.4 METHOD OF SAMPLING

Legal Requirements

The CODEX General Guidelines on sampling (CAC/GL 50-2004) provide fair and valid sampling procedures to be used when food is being tested for compliance with CODEX commodity standards.

Article 4 of Regulation (EU) 2017/186 laying down the requirements for sampling and analysis.

Findings

39. From each ready-for-export consignment (maximum 20 tons in a 20 foot container or 27 tons in a 40 foot container) samples of approximately 30g are aseptically and randomly drawn from five different bags/packages and then pooled to make one composite sample of 150g each. Five such composite samples are prepared. A bag once sampled will not be sampled again. Thus from each consignment 25 different bags are sampled. The composite sample is placed in a separate, clean, sterile, and labelled container/bag to ensure adequate protection from external microbiological contamination.
40. Where a consignment comprises material from more than one processing lot, the material from different lots is sampled separately. All necessary precautions are taken to avoid any change in composition of the sample, which might arise during transportation or storage.
41. From each composite sample, a 25g subsample is tested for *Salmonella spp.*. All the five samples should pass for export. Once sampled and sealed the consignment cannot be shifted. In case of an emergency, a consignment may be moved under the supervision of the laboratory.
42. The audit team observed the sampling of a consignment of sesame seeds at the premises of an exporter. The set procedure was followed. Randomly 25 bags were selected from the consignment of 760 bags. The sampled bags were marked and numbered. The audit observed a sealed consignment that had been sampled.
43. The CA informed the audit team that analysis takes place in accordance with ISO 6579. The audit team received certificates of analysis stating that ISO 6579 had been applied.

44. The audit team found that the actions taken to address recommendation No 2 of the last audit report have been adequate.

Conclusions on Method of Sampling

45. The sampling procedure for detection of *Salmonella spp.* complies with the requirements of CODEX General Guidelines CAC/GL 50-2004 and Regulation (EU) 2017/186.

5.5 CERTIFICATION PROCEDURES FOR EXPORTING TO THE EU

Legal Requirements

Article 46(1)(h) of Regulation (EC) No 882/2004 stipulates that EU controls shall have, *inter alia*, particular regard to the assurances which the TC can give regarding compliance with, or equivalence to, EU legislation.

Findings

46. Regulation (EU) 2017/186 requires in the attached health certificate the exporting authority to attest that the sesame seeds exported to the EU are produced in line with Regulation (EC) No 852/2004. The CA stated to the audit team that, as traceability to the farms is not possible (see paragraphs 23, 25 and 26) and a control of farmers cannot be performed, they sign the certificate without verifying traceability to farms and checking the implementation of measures for reducing microbiological contamination as described in Annex I of Regulation (EC) No 852/2004. The CA explained that sesame seeds for EU export are produced by hundreds of thousands of small farmers in India and trade between India's different regions is a common phenomenon. Detailed traceability to sesame farmers is not possible at present.
47. IOPEPC controls the issuance of certificates for export to the EU of sesame seeds via an online tool, available at www.sesamum.net. Access to the tool is limited to registered exporters that source their export supplies through registered sesame processing units/warehouses. A consignment can be cleared for EU export when the results of the analysis for *Salmonella spp.* on the samples taken are negative. To regulate the exports through customs, IOPEPC issues a certificate of export, which the exporter has to show to the customs. Without this certificate a consignment cannot be exported. IOPEPC also issues the Health Certificate as required by the EU.

Conclusions on Certification Procedures for Exporting to the EU.

48. There is an export procedure in place for sesame seeds for export to the EU; however, this procedure does not include verification to attest the hygienic production and handling of sesame seeds at farm and internal trade level.

5.6 RESPONSE TO RASFF NOTIFICATIONS

Legal requirements

Point 6 of CODEX Guidelines CAC/GL 25-1997 requires exchange of information between countries on rejections of imported food. In particular, the food control authorities in the exporting country should undertake the necessary investigation to determine the cause of any problem that has led to a rejection of the consignment. If requested, the food control authority in the exporting country should provide the authorities in the importing country with available information on the outcome of the necessary investigation. Bilateral discussions should take place as necessary.

Findings

49. The procedure for dealing with RASFF notifications is included in paragraph 10 of the “Procedure for Control of Contamination of *Salmonella spp.* in Sesame Seeds for Export to EU”.
50. The FBOs receive RASFF notifications within five days from the date of their receipt by India and they have to submit relevant documents concerning the non-compliant consignment to the CA within seven days. The FBO is required to conduct a root-cause analysis by one of the CA approved *Salmonella* consultants within 21 days of the notification, and subsequently, within 45 days they have to implement any recommendations made by the consultant and submit evidence of the action taken to the CA.
51. However, the audit team did not observe in the root-cause analysis reports provided that the exact source for the *Salmonella spp.* contamination had been identified. Numerous swab test results indicated the absence of *Salmonella spp.* contamination of the surfaces in the processing units visited.
52. In general, deficiencies regarding general hygiene requirements were detected and the follow-up actions addressed those. The audit team discussed the procedure for RASFF notifications with four exporters, involved in RASFF notifications between March and June 2017. In all cases the procedure had been followed, or was still underway. The implementation of the recommendations was verified by IOPEPC food safety consultants.

53. The audit team found that the actions taken to address recommendation No 3 of the last audit report have been adequate.

Conclusions on Response to RASFF Notifications.

54. There is a procedure implemented to follow-up RASFF notifications to determine the cause of the problem that had led to the notification, as required by point 6 of CODEX Guidelines CAC/GL 25-1997.

6 OVERALL CONCLUSIONS

The CA has addressed all recommendations made in the previous report on this topic satisfactorily. It has made significant progress in improving the control system for sesame seeds intended for EU export, as reflected in a reduction of the number of RASFF notifications since the previous audit. In particular the controls on processors and exporters, and the follow-up of RASFF notifications has improved. However, the current system cannot verify, due to a lack of traceability to farms, that sesame seeds are produced under conditions which comply with the general hygiene provisions for primary production set out in Part A of Annex I to Regulation (EC) No 852/2004

7 CLOSING MEETING

A closing meeting was held on 27 October 2017 with representatives of the CA. At this meeting the audit team presented the preliminary findings of the audit. The authorities proposed some meaningful comments on the preliminary findings that were accepted by the audit team.

8 RECOMMENDATIONS

An action plan in response to the recommendations below should be forwarded to the Commission services within one month of receipt of this report. This action plan should clearly set out the manner and deadlines by which the CAs will address each of the following recommendations.

No.	Recommendation
1.	<p>The competent authority should develop a control system which allows providing guarantees that the production and trade of sesame seeds for export to the EU meets the requirements of Regulation (EC) No 852/2004, as attested in the health certificate laid down in Regulation (EU) 2017/186.</p> <p><i>Recommendation based on conclusions set out in paragraphs Nos 37 and 49</i></p> <p><i>Associated findings set out in paragraphs Nos 16 and 47</i></p>

2.	<p>The competent authority should ensure that sesame seed processors which apply heat treatment processes in order to eliminate the hazard of contamination with <i>Salmonella</i> spp., develop procedures to validate these processes as required by Article 5 of Regulation (EC) No 852/2004, and should carry out official controls to verify and, as appropriate, enforce, their implementation.</p> <p><i>Recommendation based on conclusions set out in paragraph No 38</i></p> <p><i>Associated finding set out in paragraph No 30</i></p>
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The competent authority's response to the recommendations can be found at:

http://ec.europa.eu/food/audits-analysis/rep_details_en.cfm?rep_inspection_ref=2017-6274

ANNEX 1 – LEGAL REFERENCES

Legal Reference	Official Journal	Title
Reg. 852/2004	OJ L 139, 30.4.2004, p. 1, Corrected and re-published in OJ L 226, 25.6.2004, p. 3	Regulation (EC) No 852/2004 of the European Parliament and of the Council of 29 April 2004 on the hygiene of foodstuffs
Reg. 882/2004	OJ L 165, 30.4.2004, p. 1, Corrected and re-published in OJ L 191, 28.5.2004, p. 1	Regulation (EC) No 882/2004 of the European Parliament and of the Council of 29 April 2004 on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules
Reg. 2073/2005	OJ L 338, 22.12.2005, p. 1-26	Commission Regulation (EC) No 2073/2005 of 15 November 2005 on microbiological criteria for foodstuffs
Reg. 669/2009	OJ L 194, 25.7.2009, p. 11-21	Commission Regulation (EC) No 669/2009 of 24 July 2009 implementing Regulation (EC) No 882/2004 of the European Parliament and of the Council as regards the increased level of official controls on imports of certain feed and food of non-animal origin and amending Decision 2006/504/EC
Reg. 2017/186	OJ L 29, 3.2.2017, p. 24–34	Commission Implementing Regulation (EU) 2017/186 of 2 February 2017 laying down specific conditions applicable to the introduction into the Union of consignments from certain third countries due to microbiological contamination and amending Regulation (EC) No 669/2009

ANNEX II INTERNATIONAL STANDARDS

Reference Number	Full Title	Publication Details
CAC/GL 25-1997	Guidelines for the exchange of information between countries on rejections of imported food (CAC/GL 25-1997).	http://www.codexalimentarius.org/
CAC/GL 50-2004	General Guidelines on Sampling (CAC/GL 50-2004).	http://www.codexalimentarius.org/
CAC/RCP 1-1969	General principles of food hygiene (CAC/RCP 1-1969).	http://www.codexalimentarius.org/