Updated report: 21.3.12.[redacted]

Report on Trade Access Mission to The People's Republic of China 12-16 March 2012.

Persons present:[redacted]

1. **Summary:**

Pig meat: AQSIQ[1] finally agreed that export certification can be provided by an OV at a cold store. AQSIQ still have some internal procedures to complete but it is expected that trade will start before the visit to China by Jim Paice Defra MoS in May. Also discussed specific plant approvals with CNCA[2]. China will inform us soon about procedures needed to export pigs' feet. AQSIQ confirmed that the meat must be derived from pigs which were born and bred in the UK; this is a particular issue for slaughterhouses in Northern Ireland which source many pigs from Eire.

[redacted]

Pigs for breeding: AQSIQ provided constructive responses to our letter about non-negative tests results for *Brucella*, TGE, APP and PRRS in recent exports to China. They still have concerns about bio-security of isolation premises and want Defra to take more responsibility for this. AQSIQ agreed to using cELISA for Brucella serology which is a big step forward. Exporters still need to provide assurance to Defra that they have taken sufficient steps to reduce problems with non-negative tests and exports can then restart.

[1] AQSIQ: General Administration of Quality Supervision, Inspection and Quarantine of the People's Republic of China.

[2] CNCA: Certification and Accreditation Administration of the People's Republic of China.

2. Action points:

Action points: Please note that:

- **Priority ratings and target dates are my suggestions and can be reviewed.**
- **All communications with China must be routed through or seen by AG before they are sent.**

No	Subject and paragraph number from detail.	Action	Priority	Target date	For
1	Pig meat. List of cold stores and OVs. Para 3.1	Provide list with clear OV stamps and also a separate row to include the OVs SP number	High	23/3/12	DCMES
2	Pig meat. Inform [redacted] of AQSIQ has agreed that export certification can be done at cold stores. Accordingly the cold store in North Wales needs approval. Para 3.1	Write [redacted]	High	30/3/12	DCMES / [redacted]
3	Pig meat. Inform the plant with both pig and ruminant slaughter lines of the comment from FR.3.1	Discuss with the plant and FSA at meeting on 2/4/12	High	Mid January 2012	[redacted]
4	Pig meat. Inform plants of the importance of full compliance	Arrange a meeting with FSA and industry and other	High	By mid April	BPEX with FSA operations.

	once exports start. 3.1.2	administrations			
5	Pig meat. Keep other administrations, FSA and wider industry informed.3.1	Advise at the next UKECP meeting	Low	For next UKECP meeting	UKECP
6	Pig meat. Agree plant associations with industry. Provide a list to be sent to AQSIQ. Provide wording for letter to explain need to include the cold store in North Wales.3.1.2	Contact plants, produce list, draft letter	High	By 23/3/12	[redacted]
7	Pig meat. Contact AQSIQ to confirm plant associations and to provide clean list of cold stores and OV stamps etc. Remind about the Norfolk abattoir. Remind about MoS visit in May. 3.1.2	Send a letter – must be translated	High	By 30/3/12	DCMES [redacted]
8	Pig meat. Provide information on EU inspection and approval of UK meat plants.3.1.2	Send a link with letter at 7	High	By 30/3/12	FSA OPs to send to DCMES
9	Pig meat. Provide a copy	Send a link with letter at 7	High	By 30/3/12	FSA OPs to send to

	of the EU regulation on approval of cold stores.3.1.2				DCMES
10	Live pigs. Inform industry.3.2.	Inform BPA and write to companies	High	By 23/3/12	[redacted]
11	Live pigs. Contact companies and their vets to discuss and explain procedures.3.3	Mail them and discuss with vets at PVS meeting in May	High	Mail by 23/3/12	[redacted]
12	Live pigs. Revise NFG accordingly.3.3	Revise and seek comments	High	Produce draft by 23/3/12	[redacted]
13	Live pigs. Inform AHVLA regarding testing for Brucella .3.3.	Mail	High	By 23/3/12	[redacted]
14	Live pigs. Respond to letter from AQSIQ. Mention cELISA for Brucella, and approval of premises for isolation . also mention possible use of APP8 ELISA. To also ask again if there has been any further consideration of area freedom from pH1N1. 3.3	Letter. To be translated	High	30/3/12	[redacted]

15	Live pigs. Contact AHVLA about use of VOs for premises approval. Can this be combined with visits for other purposes? 3.3.	Contact AHVLA	High	30/3/12	[redacted]
16	Pig AI. Ask industry to confirm numbers and draft a programme. 3.4.	Mail BPA	High	By 23/3/12	[redacted]

3. Detail:

3.1 PIG MEAT EXPORTS TO CHINA

3.1.1.: Meeting with CNCA on 12.3.12[redacted]

[redacted] commented on the importance of plant approvals for export of food products to China in relation to food safety. He said that Chinese domestic experts will conclude their discussions on procedures for import of trotters for human consumption by the end of the week commencing 16/3/12. If these procedures are approved, these will then be sent to all interested countries and that we will be able to comment on this.

Certification of exports from cold stores: I thanked him for meeting with me at short notice and that the purpose of the visit was to resolve questions raised by AQSIQ about procedures for certification of exports of pig meat to China and that they think that this should be done from abattoirs. [redacted] confirmed that he was aware of this and that CNCA had been in contact with AQSIQ about this and that although he understood how stores are used in the EU, it was for AQSIQ to decide if products could be certified for export from there. I asked his advice on points for discussion with AQSIQ. He emphasised the need to demonstrate traceability and the availability of records, that only approved plants are used and that I needed to put emphasis on the controls and powers exerted by OVs and that these officers work for government (plant OVs work for FSA, export certifying OVs work for Defra). He also suggested that I should provide an example to illustrate how this all works. I thanked him and commented that this was particularly useful as this was similar to the advice that I had previously received from [redacted] at the Commercial Section of the Chinese Embassy in London.

[redacted] asked if AQSIQ is more risk averse since the new Food safety Laws had come into force and if AQSIQ are seeking to make their own approval of plants for export. [redacted] said that this was not so but that because of the need to reduce risk, China has to enforce proper controls. He mentioned that for example they had recently detected some microbiological contamination in imported meat from some counties. He said that CNCA approve plants but that AQSIQ provide verification of imported products. DS commented that we do need the communications between CNCA and AQSIQ to work otherwise this creates big problems for us.

I asked about outstanding approval of a cold store in North Wales and an abattoir/cutting plant in Hull. We had sent the form for the cold store over a year ago and it been missed out and the form for the abattoir was sent in mid February 2012. [redacted] said that he had only received the form for the abattoir last week and that he had not yet considered it. He said that consideration of the cold store would depend on the decision of AQSIQ on exports from cold stores and that we should wait for that.

I also asked about listing of an abattoir in Norfolk which is approved by CNCA but not listed on their web site. He said this was an omission and that he would look into it.

I advised [redacted] that FSA and AHDB will meet on 2/4/12 with an abattoir with separate pig and ruminant lines regarding possible approval for export to China if sufficient complete separation is provided. At my last visit [redacted] had said that this would be possible in principle but that this would need to be inspected by Chinese officials. I advised [redacted] that depending on the decision by the plant we would advise him if an inspection is required. On 15.3.12 however an official from the French Embassy advised me that a year ago a French plant with two lines had not been approved for export – industry needs to discuss this with the plant involved. Any changes to the plant would be at their risk.

I confirmed that once AQSIQ had decided regarding export certification we would send a revised and tidier list of plants with their OV names stamps and signatures.

I mentioned the importance of this trade to the UK and government and that we hoped that the procedures could be agreed soon. I mentioned the proposed visit by Defra MoS Jim Paice in May. He took note of this and said that he will wait to hear from us. He said that he too hoped that the long negotiations could soon be completed.

3.1.2. Meeting with AQSIQ [redacted]

[redacted] was nearly an hour late for the meeting as she was busy with other matters. Before then, [redacted] sought clarification of the procedures.

[redacted] asked me for further information which I provided as discussed in London with [redacted] the week before. After earlier discussion at the Embassy, on the advice on [redacted] I had decided not to ask to make a power point presentation.

I firstly mentioned the importance of this trade to the UK and that we had been working long and hard to ensure compliance with China's conditions and that we wanted the trade to start and also to continue. I emphasised the importance attached to this by our MoS Mr Paice. Accordingly we had worked closely with FSA and industry to ensure strict compliance with the Chinese rules. I emphasised the CNCA visit to the UK in 2009, plant approvals, internal procedure including internal movement certificates, traceability, control and the role of OVs. I emphasised that meat is not processed or packaged in cold stores and that meat for China would be kept separate. I provided a copy of the internal movement certificate in both English and Chinese (to ensure full clarity of its purpose).

GH reiterated the importance of this trade and its importance to both sides and that this is in line with the UK-China bilateral agreement for £100m in trade.

There was long discussion on the role of cold stores and the association or linkage of plants and if they were approved or not. With agreement from industry (PH) we agreed to associate plants if required.

I asked and [redacted] agreed that if plant associations were provided, export certification could be provided by OVs at the cold store and that we now only need to provide names, signatures and stamps of OVs at cold stores (and that these were not needed from OVs at abattoirs and cutting plants.

[redacted] asked if we could provide reports or web site links to EU inspection and approval of UK meat plants.

[redacted] then asked about processing and packing of meat in cold stores – his concern was to establish if it was possible that fraudulent repacking of non-compliant meat could occur there. I gave him a categorical assurance that processing and packaging of meat does not occur in the UK cold stores involved and that only plants which are approved as cutting plants under the EU Hygiene rules can do this. I emphasised that cold stores are just cold stores and that they are not approved to do this. I emphasized that controls imposed by the LA plant inspectors and also the checks and controls imposed by the OV.

[redacted] asked about the one stand alone cutting plant approved for export and if it also processes ruminant products. PH confirmed that this plant is part of a pig meat producing company and that this plant only produces pig meat. I confirmed this (as I had seen and signed the application for submission for approval to China). I also emphasised that it was not in our interest to allow such fraud as this would risk the continuance of this trade.

[redacted] asked us to provide a copy of the EU Rules on the operation of cold stores which I agreed to do (this is part of the EU hygiene package).

I asked regarding the omission of the Norfolk abattoir from the list of UK plants on the AQSIQ web site. [redacted] said this was an omission and that this will be corrected.

I then asked if lists of plant associations and revised lists of plants with their association OV details were provided if the trade could then commence. Mme Yu said that some internal procedures remained to be completed and that several officials needed to sign off some papers to enable trade to commence. I mentioned the proposed visit by Defra MoS Jim Paice in May and that it would be good if the trade could have started well before then and ideally as soon as possible. Peter Hardwick said that the approved companies involved had already started to store product for export. Mme Yu noted this but would not make a commitment to an exact time.

[redacted] asked again about storage of pig meat in cold stores and if it would be stored in separate rooms from other products. I and PH explained the principle of separate storage areas in cold stores (and not the use of separate rooms and that this principle was accepted by other countries such as the USA, Japan and Korea. I also said that these procedures were seen and accepted by the CNCA inspectors in 2009.

I asked if the meat must only be derived from pigs which were born and bred in the UK as this is a particular issue for slaughterhouses in Northern Ireland which source many pigs from Eire. [redacted] was very clear that the pigs could not be sourced from another MS for the reason that the UK competent authority does not have control over pig farms in other MSs and for this reason we could not provide assurance of the health status of those pigs. It is important to note that the requirement that the pigs must be born and bred in the UK is spelt out in the agreed import protocol. This was exactly the same response as Wang Ning gave me in February.

Actions for paragraph 3.1 on export of pig meat to China:

No	Subject	Action	Priority	Timing	For
FROM MEETING WITH CNCA					
1	List of cold stores and OVs	Provide list with clear OV stamps and also a separate row to include the OVs SP number	High	23/3/12	DCMES
2	Inform [redacted] of AQSIQ has agreed that export certification can be done at cold stores. Accordingly the cold store in North Wales needs approval	Write [redacted]	High	30/3/12	DCMES / [redacted]
3	Inform the plant with both pig and ruminant slaughter lines of the comment from FR	Discuss with the plant and FSA at meeting on 2/4/12	High	Mid January 2012	[redacted]
4	Inform plants of the importance	Arrange a meeting with	High	By mid	BPEX with FSA

	of full compliance once exports start	FSA and industry and other administrations		April	operations.
5	Keep other administrations, FSA and wider industry informed	Advise at the next UKECP meeting	Low	For next UKECP meeting	DCMES, UKECP
FROM MEETING WITH AQSIQ					
6	Agree plant associations with industry. Provide a list to be sent to AQSIQ. Provide wording for letter to explain need to include the cold store in North Wales	Contact plants, produce list, draft letter	High	By 23/3/12	[redacted]
7	Contact AQSIQ to confirm plant associations and to provide clean list of cold stores and OV stamps etc. Remind about the Norfolk abattoir. Remind about MoS visit in May.	Send a letter – must be translated	High	By 30/3/12	DCMES [redacted]
8	Provide information on EU inspection and approval of UK meat plants	Send a link with letter at 7	High	By 30/3/12	FSA OPs to send to DCMES
9	Provide a copy of the EU regulation on approval of cold stores	Send a link with letter at 7	High	By 30/3/12	FSA OPs to send to DCMES

3.3. LIVE PIGS FOR BREEDING (13/3/12): [redacted]

I mentioned my letter on 8 February and the reply from [redacted] on 7 March and the urgent need to meet to meet now to clarify procedures to enable trade to recommence because of UK companies plans to export shortly. [redacted] said that AQSIQ had received several enquiries from pig producers to ask when the trade can start again.

I stated again that excepting the breakdown with Actinobacillus pleuropneumoniae (APP) infection in one batch of pigs last Autumn, we consider that the non-negative serological test results which had occurred last year were all due to false positive test results.

[redacted] commented on my letter and particularly regarding the numbers of non-negative results for APP. I explained the problems that the testing requirements created but that I had informed the companies and their vets of this situation and explained to them that they must comply with the Chinese requirements and reduce the proportions of non-negative results. I emphasised that it was impractical to expect that all test results would be negative. I said that we are looking into an ELISA for APP Type 8 and that we would get back to him on this.

He agreed that we can use cELISA from now on for testing for Brucella (this is a great improvement for us as the SAT used before had very poor specificity).

I asked about using the same premises for the two separate 30 day periods of pre-isolation and pre-export quarantine. He was not happy about this and said that they would prefer that we should use the farm of origin for pre-isolation and other separate premises for pre-export quarantine. I explained the difficulties caused by on farm isolation when large numbers of pigs were involved. I explained the possible use of tents etc on some farms. I said that I would speak to industry and write back to him with our proposals.

[redacted] asked for a formal response to [redacted] letter and he was insistent that Defra should have more direct control of the isolation and quarantine premises and that the procedures should be written out in detail. I agreed that we would do this and ask the companies to decide on the premises and that these should then be approved by the OV and in addition I agreed that we would seek final approval by a Defra VO. This last point was necessary to gain his final agreement. This will be the basis for us to seek continued use of separate pre-isolation premises.

Although he didn't agree to revise the import protocol now, he did agree that I could write to him to detail possible changes to the import protocol.

Actions for paragraph 3.3 on export of pigs for breeding to China:

No	Subject	Action	Priority	Timing	For
12	Inform industry	Inform BPA and write to	High	By	[redacted]

		companies		23/3/12	
13	Contact companies and their vets to discuss and explain procedures	Mail them and discuss with vets at PVS meeting in May	High	Mail by 23/3/12	[redacted]
14	Revise NFG accordingly	Revise and seek comments	High	Produce draft by 23/3/12	[redacted]
15	Inform AHVLA regarding testing for Brucella	Mail	High	By 23/3/12	[redacted]
16	Respond to letter from AQSIQ. Mention cELISA for Brucella, and approval of premises for isolation . also mention possible use of APP8 ELISA. To also ask again if there has been any further consideration of area freedom from pH1N1.	Letter. To be translated	High	30/3/12	[redacted]
17	Contact AHVLA about use of VOs for premises approval. Can this be combined with visits for other purposes?	Contact AHVLA	High	30/3/12	[redacted]

[redacted]

Updated report: 21.3.12. [redacted]

[redacted]

21 March 2012