

AUDIT  
REPORT

Audit of Official Controls  
Carried Out at Local Authority  
Approved Slaughterhouses  
– Tipperary South County  
Council

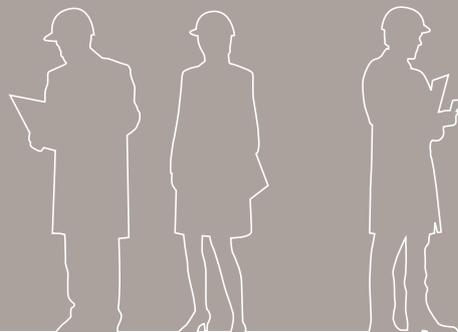
NOVEMBER 2012



# AUDIT REPORT

## Audit of Official Controls Carried Out at Local Authority Approved Slaughterhouses – Tipperary South County Council

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## **Table of Contents**

<b>1.</b>	<b>GLOSSARY .....</b>	<b>2</b>
<b>2.</b>	<b>EXECUTIVE SUMMARY .....</b>	<b>3</b>
<b>3.</b>	<b>INTRODUCTION.....</b>	<b>4</b>
	3.1. Audit Objective .....	4
	3.2. Audit Scope.....	5
	3.3. Audit Criteria and Reference Documents .....	5
	3.4. Audit Methodology .....	6
<b>4.</b>	<b>OFFICIAL CONTROLS PERFORMED IN ACCORDANCE WITH REGULATION 882/2004 .....</b>	<b>7</b>
	4.1. Organisation and Structure of Official Controls.....	7
	4.2. Coordination and Planning of Official Controls .....	7
	4.3. Documented Procedures .....	8
	4.4. Staff Performing Official Controls .....	9
	4.5. Official Controls carried out by Temporary Veterinary Inspectors .....	10
	4.6. Communications with Food Business Operators .....	10
<b>5.</b>	<b>OFFICIAL CONTROLS PERFORMED IN FOOD ESTABLISHMENTS.....</b>	<b>11</b>
<b>6.</b>	<b>CONCLUSIONS.....</b>	<b>12</b>
<b>7.</b>	<b>RECOMMENDATIONS.....</b>	<b>12</b>

## **1. GLOSSARY**

FSAI	Food Safety Authority of Ireland
SOP	Standard Operating Procedure
TVI	Temporary Veterinary Inspector

## **2. EXECUTIVE SUMMARY**

The Food Safety Authority of Ireland (FSAI) is responsible for the enforcement of all food legislation in Ireland, which is carried out through service contracts with official agencies. As part of its legal mandate, the FSAI is required to verify that the system of official controls is working effectively. For the purposes of assessing the delivery of official controls by Tipperary South County Council, this audit of official controls in approved slaughterhouses was carried out. The audit focused on ante and post-mortem inspections, associated checks and other tasks and specific requirements carried out under Regulation (EC) No 854/2004, including supervision and training of temporary veterinary inspectors.

This audit with Tipperary South County Council was one in a programme of five audits undertaken. The first part of the audit concentrated on paperwork associated with official controls, with an emphasis on the work carried out by and supervision of temporary veterinary inspectors. The second part of the audit involved on-site verification in two approved slaughterhouses, which included an assessment of the official controls carried out.

Standard operating procedures have been developed for use by local authority veterinary inspectors while carrying out official controls. Tipperary South County Council made use of these standard documented procedures and had circulated them to official control staff. Copies of the documented procedures were available to the veterinary officers with responsibility for official controls at both of the establishments visited.

Two establishments were selected for on-site verification, which included an assessment of the duties being undertaken by the official control staff at these establishments. The official control staff in both establishments visited demonstrated a familiarity with the relevant documented procedures for carrying out their official control duties and were experienced in conducting ante and post-mortem inspections. The official control tasks observed during the on-site verification work complied in general with the requirements of the legislation and the standard operating procedures.

The lairage in both of the establishments visited was adequate for carrying out ante-mortem inspection. However, the boot-wash facility in one of the establishments required improvement.

In one of the establishments visited, there were gaps in the food chain information on a small number of forms. This finding was not noted on the ante-mortem certificate by the official control staff.

In one of the slaughterhouses visited, due to the close proximity to Tipperary South County Council's office, the official control staff sign the ER106 form in the office, rather than at the establishment. A local procedure describing this deviation from the standard procedure should be developed and documented by Tipperary South County Council.

In one establishment, where post-mortem was being carried out, the carcasses which had been stamped by the official control staff were hygienically dressed and the health mark was legible.

Batching of offal was being carried out at some of the approved slaughterhouses, and the documentation regarding this practice, including the application and letter grating permission from Tipperary South County Council was verified during the audit.

The food business operators at both establishments had developed detailed documented procedures and records were well maintained.

The system and procedures in place in Tipperary South County Council with regards to ante and post-mortem inspections were being followed and ensured compliance with the requirements of Regulation (EC) No 854/2004.

### **3. INTRODUCTION**

The FSAI is responsible for the enforcement of all food legislation in Ireland. The FSAI carries out this enforcement function through service contracts with official agencies. These service contracts outline an agreed level and standard of food safety activity that the official agencies perform as agents of the FSAI. Tipperary South County Council has entered into a service contract with the FSAI and is responsible for the implementation and enforcement of national and EU legislation as it applies to establishments under their supervision. It is a requirement of the service contract that the local authority shall ensure that official controls are carried out regularly; on a risk basis, and with appropriate frequency.

As part of its legal mandate, and in accordance with Schedule 5 of the Service Contract, the FSAI is required to verify that the system of official controls is working effectively. For the purposes of assessing the delivery of official controls by Tipperary South County Council, this audit focused on official controls undertaken in approved slaughterhouses. Compliance by the local authority (Tipperary South County Council) with regard to relevant food legislation, adherence to the terms and requirements of the FSAI service contract, including supervision and training of veterinary officers, as well as conformance with relevant documented procedures was assessed.

This audit with Tipperary South County Council was one in a programme of five audits to assess the official controls carried out at local authority approved slaughterhouses. This report describes the audit objective, scope, methodology and the findings from the audit of Tipperary South County Council.

The official controls in Tipperary South County Council are carried out by the county veterinary officer and two full-time veterinary officers. The county is split geographically, and each of the three official control staff has responsibility for a number of establishments, where they carry out the full suite of official controls. These include ante and post-mortem inspections as well as hygiene inspections, sampling, annual audits, approvals, etc. The county veterinary officer and the two veterinary officers cover for each other on a routine basis, for holidays, meetings, etc. There are also two substitute temporary veterinary inspectors (TVIs) that provide a limited amount of cover (typically less than ten days per annum) for the county veterinary officer and the veterinary officers.

#### **3.1. Audit Objective**

The objective of this audit was to assess the delivery and effectiveness of official controls carried out by TVIs<sup>1</sup> in food business operations supervised by Tipperary South County Council. The audit focused on ante and post-mortem inspections, associated checks and other tasks and specific requirements carried out under Regulation (EC) No 854/2004, including supervision and training of TVIs.

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<sup>1</sup> In Tipperary South County Council, these duties are carried out by the county veterinary officer and the two veterinary officers; and it was this which was assessed as part of this audit.

### **3.2. Audit Scope**

FSAI audits of official controls involve verifying compliance by official agencies with regard to relevant legislation and adherence to the FSAI Service Contract, as well as relevant Guidance Notes and Codes of Practice. This audit assessed the official control duties undertaken by TVIs<sup>1</sup> at slaughterhouses approved by Tipperary South County Council. Additionally, on the spot confirmation at two approved slaughterhouses took place, in order to verify implementation of the necessary supervisory arrangements and to assess the official control duties being undertaken at these establishments. Official controls assessed at the slaughterhouses included the following inspection tasks:

- Checks and analysis of food chain information
- Ante-mortem inspection
- Post-mortem inspection, and
- Communication of inspection results to the food business operator and to the local authority

In addition to the above official control checks, the provision and suitability of equipment and personal protective clothing required to carry out such official control duties were also assessed.

### **3.3. Audit Criteria and Reference Documents**

During the audit, compliance with the audit criteria was assessed, which included:

- [FSAI Service Contract](#) (including the FSAI Act)
- National Control Plan for Ireland, 2007-2011
- Tipperary South County Council Business/Service Plans & data supplied to the FSAI
- Documented procedures for the local authority veterinary service
- [Regulation \(EC\) No 178/2002](#) laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety, as amended
- [Regulation \(EC\) No 852/2004](#) on the hygiene of foodstuffs, as amended
- [Regulation \(EC\) No 853/2004](#) laying down specific hygiene rules for food of animal origin, as amended
- [Regulation \(EC\) No 854/2004](#) laying down specific rules for the organisation of official controls on products of animal origin intended for human consumption, as amended
- [Regulation \(EC\) No 882/2004](#) on official controls performed to ensure verification of compliance with feed and food law, animal health and animal welfare rules, as amended
- [Regulation \(EC\) No 2073/2005](#) on microbiological criteria for foodstuffs, as amended
- [S.I. No. 432/2009](#): European Communities (Food and Feed Hygiene) Regulations, 2009, as amended
- Guidance Notes/Codes of Practice and other relevant other relevant legislation detailed in the FSAI Service Contract

### **3.4. Audit Methodology**

This audit of official controls was undertaken using documented procedures which are included in the FSAI Quality Management System, namely the FSAI Audit Procedure and Charter. These procedures implement the FSAI audit obligations, defined in Schedule 5 of the service contract between the FSAI and Tipperary South County Council, and are in accordance with the requirements of Regulation (EC) No 882/2004 (including Article 6.1 of Commission Decision 2006/677/EC) and the FSAI Act.

A pre-audit questionnaire was forwarded to Tipperary South County Council. The purpose of the pre-audit questionnaire was to collate and confirm information regarding official controls and documented procedures within Tipperary South County Council's functional area.

An evaluation plan was then developed, which provided a detailed overview of the audit; including audit scope, objectives, criteria and team. The evaluation plan also included a proposed itinerary for on-site activity.

The on-site activity took place on Monday, 23rd July, 2012. As this audit was condensed into one day, it commenced with an early morning visit to an approved slaughterhouse to evaluate the carrying out of an ante-mortem inspection.

Following this on-site visit, an opening meeting was held and the desktop activities were carried out. The desk top element of the audit involved a review of the information provided as part of the pre-audit questionnaire as well as an audit of paperwork associated with official controls; with an emphasis on ante and post-mortem inspections, including associated checks and tasks specified in Regulation (EC) No 854/2004

The documentation examined as part of the desktop audit included:

- Inspection reports for official control inspections (ante and post-mortem reports, hygiene inspection reports)
- Communications, reports and letters to TVIs and food business operators
- Records of supervisory activities and training carried out by Tipperary South County Council, including provision of updates on legislation and standard operating procedures (SOPs) and
- Warrants of authorisation granted to official control staff to carry out official control duties

The audit involved on-site verification in two food business establishments, which included an assessment of the official control duties undertaken at these establishments. The audit focused on ante and post-mortem inspections, including associated checks and tasks specified in Regulation (EC) No 854/2004.

A closing meeting was held at the end of the audit; the purpose of which was to outline the main findings from the audit. The findings were discussed and Tipperary South County Council was provided with an opportunity to provide clarification and/or additional information, as well as providing feedback on the audit.

## **4. OFFICIAL CONTROLS PERFORMED IN ACCORDANCE WITH REGULATION 882/2004**

### **4.1. Organisation and Structure of Official Controls**

Tipperary South County Council provides a range of food safety/food control services in accordance with the service contract with the FSAI. These services include inspection and audit of relevant food businesses together with other checks and official controls to ensure compliance with food law and management of food alerts and outbreaks. The local authorities are autonomous bodies with no formal regional structure. Official control services in Tipperary South are delivered by the county veterinary officer, with the assistance of two full-time veterinary officers. There are also two substitute TVIs that provide cover for the county veterinary officer and veterinary officers, if required.

Within the Tipperary South County Council functional area, there are 21 approved slaughterhouses, which are supervised by the local authority. Tipperary South County Council provided details of the official control duties undertaken in each of the approved establishments. The FSAI holds a national register of local authority supervised establishments and all 21 establishments were on the FSAI register.

### **4.2. Coordination and Planning of Official Controls**

Article 3 of Regulation (EC) No 882/2004 requires that official controls are carried out regularly, on a risk basis and with appropriate frequency.

This audit focused on the official control duties carried out in approved slaughterhouses supervised by Tipperary South County Council. These duties included ante and post-mortem inspections, associated checks and other tasks and specific requirements carried out under Regulation (EC) No 854/2004. In Tipperary South County Council, these tasks are typically carried out by the county veterinary officer and the two veterinary officers. Arrangements are made between the local authority and the food business operator in relation to slaughter times and the associated official controls. Details of these arrangements were verified in two establishments visited as part of the on-site verification work, during the audit.

### **4.3. Documented Procedures**

Article 8 of Regulation (EC) No 882/2004 requires that competent authorities carry out their official controls in accordance with documented procedures containing information and instructions for staff, and must keep these procedures up-to-date.

A standardisation working group develops and reviews documented procedures, to be followed by local authority veterinary inspectors while carrying out official controls. There are a number of standard SOPs, which have been developed by this standardisation working group, which are relevant to this audit.

These include:

- SOP A1: Veterinary Ante-mortem Procedure
- SOP A2: Veterinary Post-mortem Procedure
- SOP A5: Verification of Official Controls for Trichinella in Meat
- SOP A6: Slaughterhouse Inspection/Audits
- SOP A9: Operation of Animal Identification and Movement System
- SOP A10: Operation of the National Sheep Identification System
- SOP A11: Operation of the National Pig Identification and traceability System
- SOP A15: Clean Animals
- SOP A18: National Pig Salmonella Control Programme
- SOP A19: Code of Judgement in relation to Tuberculosis
- SOP A21: TSE Surveillance Programme in Sheep and Goats

Tipperary South County Council makes use of the relevant SOPs and uses the ante and post-mortem forms provided as part of SOPs A1 and A2. During visits to the two establishments, the use of the ante and post-mortem forms by the official control staff was verified.

Copies of the documented procedures are provided to the staff carrying out official controls. The official control staff in the two establishments visited confirmed that they had been provided with a copy of the relevant legislation and SOPs by the local authority. The official control staff were familiar with the content of these SOPs and both had copies of the SOPs. Tipperary South County Council advised that the two substitute TVIs had also been provided with copies of the relevant SOPs. The system could be strengthened by having the official control staff sign a declaration that they have received and read the documented procedures relevant to their work.

#### **4.4. Staff Performing Official Controls**

Article 6 of Regulation (EC) No 882/2204 requires that the competent authority shall ensure that all of its staff performing official controls receive, for their area of competence, appropriate training enabling them to undertake their duties competently and to carry out official controls in a consistent manner. Staff performing official controls keep up to date in their area of competence and receive regular additional training as necessary and have an aptitude for multidisciplinary cooperation.

The veterinary services team in Tipperary South County Council comprises one county veterinary officer and two full-time veterinary officers. There are also two substitute TVIs that provide a limited amount of cover for the county veterinary officer and the veterinary officers. The county veterinary officer and veterinary officers make the necessary arrangements for official controls in each of the approved slaughterhouses, under their supervision, with the food business operator. Each of the three official control staff has responsibility for a number of establishments, where they carry out the full suite of official controls. The county veterinary officer and the two veterinary officers cover for each other on a routine basis, for holidays, meetings, etc.

Tipperary South County Council has agreed Section 85<sup>2</sup> orders with three other local authorities. This Section 85 order facilitates the carrying out of official controls in one local authority area by another local authority.

Authorisations under the European Communities (Food and Feed Hygiene) Regulations, 2009 (S.I. No. 432/2009) and the Food Safety Authority of Ireland Act, 1998 (S.I. No. 29 of 1998) were verified for staff carrying out official controls in Tipperary South County Council.

Training and supervision of the official control staff by Tipperary South County Council is provided through both formal training sessions and informal meetings between the county veterinary officer and two veterinary officers. The official control staff meet formally on a monthly basis to discuss issues relevant to their roles. Records of these meetings are maintained and topics discussed are noted. Topics discussed during recent meetings included the SOPs, ante and post-mortem inspections, emergency slaughter, animal by-products, poultry inspection and wild game. The county veterinary officer and veterinary officers would review new or amended legislation and present to the other staff members at these meetings. The county veterinary officer and veterinary officers would also attend meetings with the FSAI related to their official control duties.

Availability, storage and suitability of equipment for carrying out official control duties was examined in each of the two establishments visited as part of the on the spot check. The ink and stamps for stamping carcasses were kept securely, in the vehicles, by the official control staff responsible for official controls at the two establishments visited. Ink for staining condemned meat and forms for recording condemnation of carcasses were available in both of the establishments. Offal condemnations and other post mortem findings of relevance were recorded on the post-mortem forms in both of the establishments visited. The county veterinary officer and veterinary officers at the establishments wore suitable, clean, protective clothing for carrying out their official control duties.

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<sup>2</sup> Local Government Act, 2001: Section 85: Agreements and Arrangements Concerning Functions.

85 (1) *Where in the opinion of a local authority any function performable by it should be performed, generally or in a particular case, by another local authority, and that other authority is able and willing so to perform the function, then the authorities may enter into an agreement that -*

*(a) the function shall be so performed on behalf of the first mentioned authority by the other authority, and  
(b) it becomes so performable by that other authority in accordance with the agreement.*

## **Audit of Official Controls Carried Out at Local Authority Approved Slaughterhouses Tipperary South County Council**

NOVEMBER 2012

The official control staff in the two establishments visited demonstrated a familiarity with the relevant legislation and documented procedures for carrying out these duties and were experienced in conducting ante and post-mortem inspections.

The official control tasks observed during the on-site verification work complied with the requirements of the legislation and the SOPs. For example, carrying out the required identity checks on sheep; and initialling those animals for which the identity was checked on the National Sheep Identification System.

### **4.5. Official Controls carried out by Temporary Veterinary Inspectors**

The county veterinary officer and veterinary officers for Tipperary South County Council are responsible for the full suite of official controls in the establishments within their geographical areas; this includes ante and post-mortem checks, hygiene inspections, sampling, annual audits, approvals, etc.

The county veterinary officer and veterinary officers report on the official controls carried out in each of the establishments. The county veterinary officer and veterinary officers input the information relating to the official control duties carried out on a monthly basis. Tipperary South County Council carries out a correlation exercise for the slaughter returns, between ante and post-mortem forms, permission to slaughter forms (ER106s), visits conducted by the official control staff and the information entered on OAPI as part of the monthly returns. If there are any discrepancies in the returns, they are addressed between Tipperary South County Council and the official staff member, and any errors corrected. No issues with regards to the timeliness of returns were identified from the paperwork reviewed.

### **4.6. Communications with Food Business Operators**

Article 9 of Regulation (EC) No 882/2004 requires that the competent authority provide the food business operator with a copy of the report on official controls carried out, at least in case of non-compliance.

The official control staff at the two establishments advised that verbal feedback is provided to the food business operator following official control duties, and this was confirmed by the two food business operators. Copies of the completed ante and post-mortem forms are left for the food business operator. If a non-compliance arose in an establishment, which required corrective action, it is, in the first instance, communicated verbally to the food business operator. There were several instances where issues which arose in the plant were recorded on the ante and post mortem forms. The veterinary officers and the county veterinary officer have responsibility for the full suite of official controls in the establishment, including the enforcement of food legislation; this ensures that issues are usually dealt with promptly by the food business operator. If the veterinary officer deemed it appropriate, or corrective action was not satisfactory, the issue would be communicated to the county veterinary officer, and a joint inspection would be undertaken.

A file is maintained for each approved slaughterhouse, where detailed and comprehensive records of correspondence sent to the food business operators are maintained.

## **5. OFFICIAL CONTROLS PERFORMED IN FOOD ESTABLISHMENTS**

Two establishments were selected for on-site verification. The purpose of these visits was to assess the official control tasks carried out at these establishments by Tipperary South County Council. The audit team were accompanied during the on-site verification visits by the county veterinary officer and the veterinary officer with responsibility for official controls in the establishment. In one of the establishments visited, the county veterinary officer was responsible for the official controls.

The food business operators and the official control staff at both establishments had a good working relationship, with good cooperation evidenced during the on-site visits. Official controls were well organised at both establishments visited as part of the on-site verification activity.

The audit team observed that the official control staff were experienced in conducting ante and post-mortem inspections and they demonstrated a familiarity with the legislation and SOPs for carrying out these duties. The official control tasks observed by the audit team complied in general with the requirements of the legislation and the SOPs.

Documentation relating to food chain information had been correctly verified by the county veterinary officer in the first establishment visited. However, in the second establishment, the primary producer had not completed all aspects of the food chain information fully, in a small number of cases, in archived records maintained by the food business operator. This finding should be noted in the comments box on the ante-mortem certificate by the official control staff.

The lairage in both of the establishments visited was adequate for carrying out ante-mortem inspection, including facilities to detain animals, if required. However, the boot-wash facility in one of the establishments required improvement.

The reference number for animals presented for slaughter was recorded on the ante and post-mortem forms examined at the two establishments visited.

The food business operators at both establishments had developed detailed documented procedures and records were well maintained.

In one of the slaughterhouses visited, due to the close proximity to Tipperary South County Council's office, the official control staff sign the ER106 form in the office, rather than at the establishment. A local procedure describing this deviation from the standard procedure should be developed and documented by Tipperary South County Council.

In one establishment, where post-mortem was being carried out, the carcasses which had been stamped by the official control staff were well dressed and the health mark was legible.

Batching of offal was being carried out at some of the approved slaughterhouses, and the documentation regarding this practice, including the application and letter granting permission from Tipperary South County Council was verified during the audit.

## **6. CONCLUSIONS**

The system and procedures in place in Tipperary South County Council with regards to ante and post-mortem inspections were being followed and ensured compliance with the requirements of Regulation (EC) No 854/2004.

## **7. RECOMMENDATIONS**

1. The system relating to provision of documented procedures to official control staff could be strengthened by having the official control staff sign a declaration that they have received and read the documented procedures relevant to their work.
2. Where there are gaps or discrepancies in food chain information, it should be recorded on the ante-mortem certificate.
3. Effective boot-wash facilities should be available at all approved slaughterhouses.
4. Where there is a deviation from standard procedures for carrying out official control duties, an additional local procedure to describe these deviations should be developed.





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