

AUDIT
REPORT

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

NOVEMBER 2012



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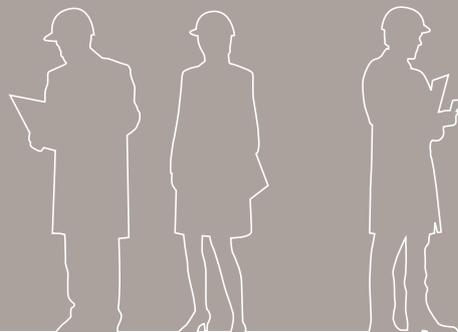


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1. GLOSSARY

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 Clare 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 Clare 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 (TVIs). 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. Clare County Council made use of these standard documented procedures and had circulated them to the temporary veterinary inspectors. One of the temporary veterinary inspectors had copies of the procedures at the establishment, and the other had them at his clinic. It would be beneficial for all temporary veterinary inspectors to have access to the documented procedures at the establishment, either electronically, or in hard copy. In one of the establishments visited during the audit, it had been necessary to modify the application of the standard procedures, due to the throughput in the establishment. An additional local procedure was being developed and documented, at the time of the audit.

Two establishments were selected for on-site verification, which included an assessment of the official control 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 with the requirements of the legislation and the standard operating procedures. However, the recording of the identification documentation reference on the post-mortem form, where it is the same as the information entered earlier on the ante-mortem form, was not in line with SOP A2: Veterinary Post-mortem Procedure.

In one establishment, where post-mortem had been carried out, the carcasses which had been stamped by the official control staff were well dressed and the health mark was relatively clear. In one of the establishments the ante and post-mortem forms were frequently not being signed by the food business operator. It would be beneficial to get the operator to sign the form, if they were available when the official controls were being carried out. The official control staff at one of the establishments did not have condemnation certificates, detained labels or condemnation ink with him at the establishment, but these were available to him at his clinic, which is in close proximity to the establishment.

In one of the establishments visited, slaughter proceeded without clearance from the animal identification and movement system. This was due to the on-line system not being available on the day of slaughter. In such cases, where clearance cannot be obtained and the food business operator wishes to carry out slaughtering, a disclaimer must be completed and signed by them, with the agreement of the official control staff. The disclaimer, which had been completed by the food business operator, in order to proceed with slaughter in the absence of approval to slaughter, was verified.

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Batching of offal was being carried out at one of the establishments visited, but documentation regarding this permission to batch is in the form of an application by the food business operator, rather than a permission granted by Clare County Council. This permission is granted on an annual basis. The standardised form did not include a signature for Clare County Council to confirm granting of permission on the application form. Clare County Council stated that as the form was on the establishment file, it was an indication that the application had been successful and that permission had been granted.

In one of the establishments, green offal is placed onto a table for visual examination by the official control staff. As the food business operator is harvesting tripe, it would be preferable, in some cases (such as where there is gross contamination), to carry out this task in the trolley, in order to avoid contaminated offal being placed onto the table.

Due to the throughput in one of the establishments, there were aspects of official controls, which represented a modification of the standard operating procedure, for example, correlation of offal. A local procedure describing how these official controls are carried out, specifically the areas which deviate from the standard procedure, was being developed and documented by Clare County Council.

The system and procedures in place in Clare 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. Clare 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 Clare County Council, this audit focused on official controls undertaken by TVIs. Compliance by the local authority (Clare County Council) with regard to relevant food legislation, adherence to the terms and requirements of the FSAI service contract, including supervision and training of TVIs, as well as conformance with relevant documented procedures were assessed.

This audit with Clare 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 Clare County Council.

3.1. Audit Objective

The objective of this audit was to assess the delivery and effectiveness of official controls carried out by TVIs in food business operations supervised by Clare 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.

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 at slaughterhouses approved by Clare 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 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:

- [The FSAI Service Contract](#) (including the FSAI Act)
- National Control Plan for Ireland, 2007-2011
- Clare County Council Business/Service Plans and 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 Clare 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 Clare County Council. The purpose of the pre-audit questionnaire was to collate and confirm information regarding official controls and documented procedures within Clare 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 Wednesday, 20th June & Thursday, 21st June, 2012. The first part of the audit was spent on desktop activities; commencing with an opening meeting to explain the objective of the audit, the audit methodology and how the audit findings would be reported. The desktop 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 the duties carried out by the TVIs.

The evidence 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 Clare County Council with TVIs, including provision of updates on legislation and standard operating procedures (SOPs) and
- Documentation relating to authorisations granted for TVIs to carry out official control duties

The second part of the audit involved on-site verification in two food business establishments which included an assessment of the official control duties being undertaken by the TVIs at these establishments. 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.

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 Clare 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

Clare 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 Clare are delivered by the county veterinary officer, with the assistance of TVIs. There will be a depletion in staffing resources over the coming months in Clare County Council due to the retirement of one staff member who carries out official controls.

Within the Clare County Council functional area, there are seven approved slaughterhouses, which are supervised by the local authority. Clare 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 seven 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 Clare 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 Clare County Council, these tasks are typically carried out by TVIs. 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 operating procedures (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 (AIMS)
- SOP A10: Operation of the National Sheep Identification System (NSIS)
- SOP A11: Operation of the National Pig Identification and traceability System (NPITS)
- 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

Clare County Council makes use of the relevant SOPs and uses the ante and post-mortem forms provided as part of SOPs A1 & 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 SOPs by the local authority. The official control staff were familiar with the content of these 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.

One of the TVIs had copies of the SOPs at the establishment, and the other TVI had them at his clinic; which is in close proximity to the establishment. It would be beneficial for all TVIs to have access to the documented procedures at the establishment, either electronically, or in hard copy.

In one of the establishments visited during the audit, it had been deemed necessary by the county veterinary officer, to modify the application of the SOPs, due to the throughput in the establishment. An additional local procedure was being developed and documented, at the time of the audit. The purpose of this local procedure was to describe the official controls in this establishment where they deviate from the standard SOPs, e.g. the ante-mortem procedure.

4.4. Staff Performing Official Controls

Article 6 of Regulation (EC) No 882/2004 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 aptitude for multidisciplinary cooperation.

The veterinary services team in Clare County Council comprises one county veterinary officer and four TVIs. Administrative support is also provided. The four TVIs make the necessary arrangements for official controls in each of the approved slaughterhouses with the food business operator. It is the responsibility of the TVI to ensure cover is provided for holidays, and the deputy TVI is provided with the necessary equipment and information to carry out the official control duties. Deputy TVIs are provided with legislation and other information relevant to their duties by the local authority or the TVI for whom they are providing cover.

Clare County Council was, at the time of this audit, in the process of agreeing a Section 85¹ order with another local authority. 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 Clare County Council.

Training and supervision of the official control staff by Clare County Council is provided through a series of both formal and informal meetings, which are held with each of the TVIs and tailored to the specific requirements of that staff member. Clare County Council provides official control staff with updates on legislation, documented procedures and other relevant issues at these meetings and also by correspondence. Formal meetings take place with each TVI on an annual basis, and informal meetings take place throughout the year, as issues arise. Detailed records of the documentation circulated and the topics discussed at these meetings were maintained by the local authority and verified as part of the audit. These records could be strengthened by having the staff member counter sign them. Correspondence which had been forwarded by Clare County Council to TVIs regarding issues relevant to official control duties was also assessed.

Access to 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 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 one of the establishments. The condemnation certificates were not in a triplicate book, which would be useful. Condemnations of parts of a carcass, or entire carcasses, were recorded on the post-mortem forms, evidence of this was seen in the two establishments visited.

¹ 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.*

The official control staff in the two establishments visited demonstrated a familiarity with the relevant 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

Official control duties performed by the TVIs for Clare County Council include ante and post-mortem examinations, as well as checks on food chain information and animal by-products.

The TVIs report back to Clare County Council on the official controls carried out in each of the establishments. Completed ante and post-mortem forms are returned by the TVIs either on a weekly or a monthly basis. Clare County Council carries out a correlation exercise for the slaughter returns, between ante and post-mortem forms, permission to slaughter forms (ER106s) and the TVI visits. If there are any discrepancies in the returns, it would be addressed between Clare County Council and the TVI, and any errors would be corrected. No issues with regards to the timeliness of returns from the TVIs or the local authority 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 provides the food business operator with a copy of the report on official controls carried out, at least in case of non-compliance.

Clare County Council and TVIs in 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. If the TVI deemed it appropriate, or if corrective action was not satisfactory, the issue would be communicated to the local authority for appropriate follow up.

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 Clare County Council. The audit team were accompanied during the on-site verification visits by the county veterinary officer and the TVI with responsibility for official controls in the establishment.

The TVIs carrying out official control duties at the two establishments visited were experienced in conducting ante and post-mortem inspections and they demonstrated a familiarity with the relevant SOPs for carrying out these duties. The official control tasks observed during the on-site verification work complied with the requirements of the legislation and the SOPs. However, the recording of the identification documentation reference on the post-mortem form, where it is the same as the information completed earlier on the ante-mortem form was not in line with SOP A2: Veterinary Post-mortem Procedure. The SOP recommends in such cases that “as for ante-mortem” should be written on the post-mortem form; or the animal identification details be re-written.

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Food chain information was verified in the two establishments visited and the official control staff had marked the animals for which identification had been verified as being complete and containing no obvious omissions or errors.

The lairage in both of the establishments visited was adequate for carrying out ante-mortem inspection.

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

In one of the establishments, the ante and post-mortem forms were frequently not being signed by the food business operator. It would be beneficial to get the food business operator to sign the form if they were available when the official controls were being carried out.

The official control staff at one of the establishments did not have condemnation certificates, detained labels or condemnation ink with him at the establishment, but these were available to him at his clinic, which is in close proximity to the establishment.

In one of the establishments visited, slaughter proceeded without clearance from the animal identification and movement system. This was due to the online system not being available on the day of slaughter. In such cases, where clearance cannot be obtained and the food business operator wishes to carry out slaughtering, a disclaimer must be completed and signed by the food business operator, with the agreement of the official control staff. The disclaimer, which had been completed by the food business operator, in order to proceed with slaughter in the absence of approval to slaughter, was verified.

Batching of offal was being carried out at one of the establishments visited, but documentation which allowed this practice to take place is in the form of an application by the food business operator, rather than a permission granted by Clare County Council. The granting of this permission by the local authority takes place on an annual basis. The standard SOP form did not include a signature for Clare County Council to confirm granting of permission on the application form. Clare County Council stated that as the form was on the establishment file, it was an indication that the permission had been granted.

In one of the establishments, green offal is placed onto a table for visual examination by the official control staff. As the food business operator is harvesting tripe, it would be preferable, in some cases (such as where there is gross contamination), to carry out this task in the trolley, in order to avoid contaminated offal being placed onto the examination table.

Due to the throughput in one of the establishments, there were aspects of the official controls which represented a modification of the SOP, for example, correlation of offal. A local procedure describing how these official controls are carried out, specifically the areas which deviate from the SOP, was being developed and documented by Clare County Council.

6. CONCLUSIONS

The system and procedures in place in Clare 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. The work, already commenced at the time of the audit, in relation to documenting an additional local procedure to describe the official controls in one establishment where they deviate from the standard procedures, should be completed.
3. Ink for staining condemned meat, forms for recording condemnation of carcasses and detained labels should be available to official control staff at all approved slaughterhouses.
4. The recording of the identification documentation reference on the post-mortem form, where it is the same as the information entered earlier on the ante-mortem form should be in line with SOP A2: Veterinary Post-mortem Procedure.
5. The ante and post-mortem forms should be signed by the food business operator when they are present when the official controls were being carried out.
6. The local authority should ensure that following applications to batch offal by food business operators, that a record of the granting or refusal of such applications is maintained.
7. The system in one of the establishments for examining green offal should be amended in order to avoid contaminated offal being placed onto the examination table.



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