

AUDIT
REPORT

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

NOVEMBER 2012



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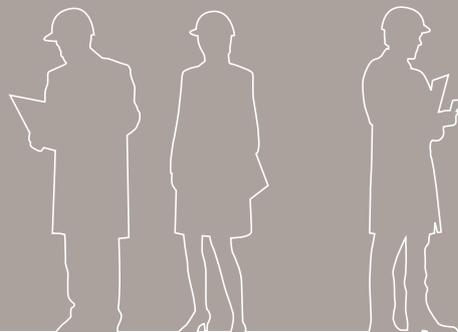


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1. GLOSSARY

FSAI	Food Safety Authority of Ireland
NSIS	National Sheep Identification System
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 Galway 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 Galway 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 (SOPs) have been developed for use by local authority veterinary inspectors while carrying out official controls. Galway County Council made use of these standard documented procedures and had circulated them to the temporary veterinary inspectors (TVIs). Both of the temporary veterinary inspectors had copies of the procedures at the establishments. However, SOP A5: Verification of Official Controls for Trichinella in Meat had not been supplied to those TVIs who supervise establishments slaughtering pigs, although the veterinary officer had discussed the requirements with those TVIs.

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 were experienced in conducting ante and post-mortem inspections and they demonstrated a familiarity with the relevant documented procedures 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 standard operating procedures. However, some opportunities for improvement were noted, in relation to the first establishment.

Carcases were examined in both establishments, which had already been subject to post-mortem examination and the health marks were clearly legible in the majority of cases.

Food chain information was verified in the two establishments visited and the checks carried out by the official control staff were in compliance with the requirements of Regulation (EC) No 854/2004. The National Sheep Identification System (NSIS) reference number for sheep and the ER106 reference number for cattle were being recorded on the ante and post-mortem forms at the two establishments visited. The checks on identity of animals carried out by the TVIs were also being recorded on the NSIS forms.

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 available in one of the establishments required improvement.

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The official control staff in each of the establishments should get the food business operator to sign the ante-mortem certificate if they are present when official controls are being carried out. The slaughter records for traceability were routinely signed by the food business operator in both establishments visited.

Batching of offal was carried out at both of the establishments visited, and the application form to batch offal as well as letters to the food business operators from Galway County Council confirming granting of the application were verified.

The system and procedures in place in Galway 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. Galway 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 Galway County Council, this audit focused on official controls undertaken by TVIs. Compliance by the local authority (Galway 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 Galway 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 Galway 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 Galway 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 Galway 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
- Galway 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 Galway 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 Galway County Council. The purpose of the pre-audit questionnaire was to collate and confirm information regarding official controls and documented procedures within Galway 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, 13th & Tuesday, 14th August, 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 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 Galway County Council with TVIs, including provision of updates on legislation and standard operating procedures (SOPs) and
- Authorisations granted to 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 undertaken by the TVIs 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 Galway 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

Galway 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 Galway are delivered by the county veterinary officer and one full-time county veterinary officer, with the assistance of four TVIs.

Within the Galway County Council functional area, there are nine approved slaughterhouses, which are supervised by the local authority. Galway 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 nine 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 Galway 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 Galway County Council, these tasks are typically carried out by TVIs; although the county veterinary officer and veterinary officer carry out these duties in one establishment. 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 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

Galway 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; most recently in May 2012. SOP A5: Verification of Official Controls for Trichinella in Meat had not been supplied to those TVIs who supervise establishments slaughtering pigs, although the veterinary officer had discussed the requirements with those TVIs.

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 and both TVIs had copies at the establishments. The official control staff sign a declaration that they have received the documented procedures relevant to their work. The TVIs have been provided with access to SafetyNet, should they wish to use it to access SOPs.

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 should 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 Galway County Council comprises one county veterinary officer, one veterinary officer and four TVIs; administrative support is also provided.

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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, by their deputy TVI; who is provided with equipment, legislation and other information relevant to their official control duties, by the TVI for whom they are providing cover. In certain circumstances, for example, at short notice, or if the TVI's deputy is not available, the county veterinary officer or veterinary officer will provide cover for TVIs. The TVIs are required to inform Galway County Council when they intend to take leave.

Galway 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 for staff carrying out official controls in Galway County Council were verified by way of a Manager's Order. The county veterinary officer, veterinary officer and TVIs were authorised 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). Warrants were provided to the county veterinary officer and the veterinary officer by Galway County Council, but not for the TVIs. It would be advisable that warrants also be provided for TVIs and that these would be in their possession when undertaking official control duties.

Training and supervision of the official control staff by Galway County Council is provided through both formal training sessions and informal meetings with each of the TVIs at the establishments or their practices.

Galway County Council held a training session in May 2012 which focused on the upcoming audit of official controls carried out by TVIs and included a review of SOPs relevant to their work. Records of training, including topics covered and attendance by TVIs are maintained by Galway County Council. Training sessions also took place twice in 2010 and in 2009 with TVIs on issues of relevance to their official control duties.

The local authority provides TVIs with updates on legislation, SOPs and other relevant issues by written correspondence. For example, letters to TVIs regarding a finding from an internal audit on beef slaughter, as well as a letter to a TVI regarding a deviation from procedure were verified during the audit.

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 by the official control staff responsible for official controls at the two establishments visited. Forms for recording condemnation of carcasses and detention labels were available in both of the establishments. Ink for staining condemned meat was available at one of the establishments. The audit team was advised that the condemnation ink for the other establishment was stored at the TVI's home. Offal condemnations were recorded on the post-mortem forms in one of the establishments visited.

The official control staff in the two establishments visited demonstrated a familiarity with the relevant legislation and documented procedures 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, some opportunities for improvement were noted in relation to the first establishment, where additional equipment would be useful for the TVI.

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.*

4.5. Official Controls carried out by Temporary Veterinary Inspectors

Official control duties performed by the TVIs for Galway County Council include ante and post-mortem inspection, as well as checks on food chain information and animal by-products. The county veterinary officer and veterinary officer carry out ante and post-mortem examinations at one of the approved slaughterhouses.

The TVIs report back to Galway County Council on the official controls carried out in each of the establishments. Completed ante and post-mortem forms are returned by the TVIs on a monthly basis. Galway County Council carries out a correlation exercise for the slaughter returns, which includes a check on the numbers of animals slaughtered.

If there are any discrepancies in the returns, they are addressed between Galway County Council and the TVI, and any errors 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 provide the food business operator with a copy of the report on official controls carried out, at least in case of non-compliance.

Galway 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 with 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. Where necessary, or if corrective action was not satisfactory, the issue would be communicated to the local authority for appropriate follow-up. The TVIs in both establishments advised that issues rarely arose and if they did, the food business operator would take corrective action promptly to rectify the issue.

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

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 the two establishments.

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 legislation and 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, some opportunities for improvement were noted, in relation to the first establishment, where additional equipment would be useful for the TVI.

Food chain information was verified in the two establishments visited and the checks carried out by the official control staff were in compliance with the requirements of Regulation (EC) No 854.

The National Sheep Identification System (NSIS) reference number for sheep and the ER106 reference number for cattle were being recorded on the ante and post-mortem forms at the two establishments visited. The checks on identity of animals carried out by the TVIs were also being recorded on the NSIS forms.

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

Post-mortem inspection was being conducted in one of the establishments visited, and the TVI demonstrated familiarity with the general and specific post-mortem inspection tasks of Regulation (EC) 854/2004. However, the TVI in this establishment should give consideration to his workflow when carrying out post-mortem inspections. Carcasses were examined in both establishments, which had already been subject to post-mortem examination and the health marks were clearly legible in the majority of cases.

The official control staff in each of the establishments should get the food business operator to sign the ante-mortem certificate if they are present when official controls are being carried out. The slaughter records for traceability were routinely signed by the food business operator in both establishments visited.

Batching of offal was carried out at both of the establishments visited, and the application form to batch offal as well as letters to the food business operators from Galway County Council confirming granting of the application were verified.

6. CONCLUSIONS

The system and procedures in place in Galway 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. SOP A5: Verification of Official Controls for Trichinella in Meat should be supplied to TVIs with responsibility for official controls in establishments slaughtering pigs.
2. Warrants outlining the authorisations granted to TVIs for carrying out official controls should be issued to each TVI.
3. The ante-mortem forms should be signed by the food business operator when they are present when the official controls were being carried out.
4. Ink for staining condemned meat should be available to official control staff at all approved slaughterhouses.
5. In one of the establishments, the TVI should consider workflow when conducting post-mortem inspection. Additional equipment for the TVI would benefit official controls being carried out at this establishment.
6. Effective boot-wash facilities should be available at all approved slaughterhouses.



Abbey Court,
Lower Abbey Street,
Dublin 1.

Advice Line: 1890 336677
Telephone: +353 1 817 1300
Facsimile: +353 1 817 1301
Email: info@fsai.ie
Website: www.fsai.ie