

AUDIT
REPORT

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

NOVEMBER 2012



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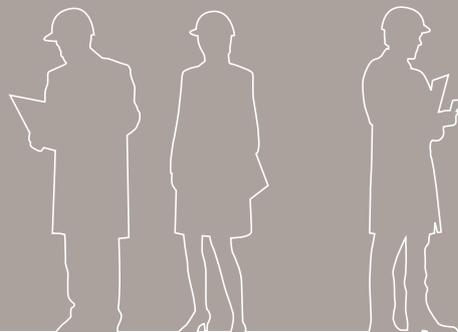


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1. GLOSSARY

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| 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 Kerry 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 (TVIs).

This audit with Kerry 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. Kerry County Council made use of these standard documented procedures and had circulated them to the TVIs. One of the temporary veterinary inspectors had copies of the procedures at the establishments.

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. The official control tasks observed during the on-site verification work complied with the requirements of the legislation and the standard operating procedures.

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. A number of bovine and ovine carcasses were inspected in the chill in the second establishment. The carcasses had been dressed hygienically; however, health marks were not clearly legible. However, the county veterinary officer and the TVI advised of the difficulty in applying clearly legible health marks when carcasses are cooling or already chilled.

The official control staff at one of the establishments did not have detention labels at the establishment, but a separate rail was available in the establishment for detaining carcasses. The official control staff recorded offal condemnations on the post-mortem forms in one of the establishments visited¹.

Batching of offal was carried out at one of the establishments visited, and the application to carry out this activity, which was submitted in May 2012, was verified during the audit. However, at the time of the audit, Kerry County Council had not yet written to the food business operator with regards to granting this application.

The lairage in both of the establishments visited was adequate for carrying out ante-mortem inspection. No boot-wash was available at the first establishment, either at the lairage or upon entering the slaughter-hall.

The National Sheep Identification System reference number for sheep was not always recorded on the ante and post-mortem forms at the two establishments visited as per the documented procedures for ante and post-mortem.

¹ Kerry County Council advised that offal condemnations are recorded when they occur, and where no condemnations had been recorded in the second establishment, this was because none had occurred.

The systems in place in both establishments for the correlation of offal with the corresponding carcase were satisfactory; with the system in the second establishment being particularly good. The food business operator at the second establishment had developed detailed documented procedures and records were well maintained.

The system and procedures in place in Kerry 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.

Information regarding corrective actions implemented by Kerry County Council was provided following the on-site activity.

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. Kerry 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 Kerry County Council, this audit focused on official controls undertaken by TVIs. Compliance by the local authority (Kerry 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 was assessed.

This audit with Kerry 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 Kerry 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 Kerry 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 Kerry 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, as well as looking at
- 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
- Kerry 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 Kerry 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 Kerry County Council. The purpose of the pre-audit questionnaire was to collate and confirm information regarding official controls and documented procedures within Kerry 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 Tuesday, 3rd July & Wednesday, 4th July 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 Kerry County Council with TVIs, including provision of updates on legislation and standard operating procedures (SOPs) and
- Warrants of authorisation 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 Kerry 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

Kerry 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 Kerry are delivered by the county veterinary officer, with the assistance of seven TVIs. There is also a part-time veterinary inspector who assists the county veterinary officer, if required.

Within the Kerry County Council functional area, there are 18 approved slaughterhouses, which are supervised by the local authority. Kerry 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 18 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 Kerry 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 Kerry 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 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

Kerry 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 legislation and SOPs by the local authority. The official control staff were familiar with the content of these SOPs and one TVI had copies of the SOPs at the establishment. 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 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 Kerry County Council comprises one county veterinary officer and seven TVIs. There is also a part-time veterinary inspector who provides assistance to the county veterinary officer, as required and administrative support is provided.

The seven 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.

Kerry County Council was, at the time of this audit, in the process of agreeing Section 85² orders with two 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 Kerry County Council. There were a number of authorisations under the FSAI Act which were incorrectly dated.

² 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.*

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Training and supervision of the official control staff by Kerry County Council is provided through both formal training sessions and informal meetings with each of the TVIs at the establishments in which they carry out official control duties. Kerry County Council held a training session in February 2012 which focused on the legislative responsibilities of the local authority TVI.

This training session covered ante and post-mortem inspection tasks, food business operator responsibility, HACCP, food chain information and the additional duties carried out by TVIs under an agreement made with Kerry County Council in 2004. Detailed and comprehensive records of correspondence sent to the food business operators as well as the TVIs are maintained on file. The local authority provides TVIs with updates on legislation, SOPs and other relevant issues by written correspondence; including copying the TVI on the outcome of annual audits and hygiene inspections carried out by the county veterinary officer. There was also a wet-lab demonstration of ante and post-mortem inspection tasks, undertaken by the local authority county veterinary officer with TVIs, in June 2012, in one of the slaughterhouses. Detailed records of the training sessions held with the TVIs and correspondence sent to the TVIs were maintained by Kerry County Council. Informal meetings also take place throughout the year where the county veterinary officer would meet the TVIs individually, at the establishments, while official control duties are being carried out.

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. Ink for staining condemned meat and forms for recording condemnation of carcasses were available in both of the establishments. Offal condemnations were recorded on the post-mortem forms in one of the establishments visited³.

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.

³ Kerry County Council advised that offal condemnations are recorded when they occur, and where no condemnations had been recorded in the second establishment, this was because none had occurred.

4.5. Official Controls carried out by Temporary Veterinary Inspectors

Official control duties performed by the TVIs for Kerry County Council include ante and post-mortem inspection, as well as checks on food chain information and animal by-products. As part of an agreement relating to benchmarking payments in 2004, Kerry County Council requested TVIs to also carry out additional checks as part of their official control duties and provide written confirmation that the checks were being carried out in each slaughterhouse under their supervision.

These additional duties included checks on the food business operators' slaughter traceability records, pest control system, cleaning schedule and associated records, slaughter man's licence and medical certificates for slaughterhouse staff and documentation relating to specified risk material (SRM).

The TVIs report back to Kerry 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 at least a monthly basis. Kerry County Council carries out a correlation exercise for the slaughter returns, between ante and post-mortem forms, permission to slaughter forms (ER106s) and the information entered on OAPI as part of the monthly returns. Kerry County Council has developed a database for recording the detail from the documentation returned by the TVIs. If there are any discrepancies in the returns, they are addressed between Kerry 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.

Kerry 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.

Letters sent to the food business operator following hygiene inspections and annual audits carried out by the county veterinary officer are copied to the TVI, in order to ensure that they are made aware of any non-compliances which have been identified.

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 Kerry County Council. The audit team was accompanied during the on-site verification visits by the county 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.

The TVIs carrying out official control duties at the two establishments visited were familiar with the relevant legislation and SOPs for conducting ante and post-mortem inspections. The TVI in the second establishment was very experienced. The official control tasks observed during the on-site verification work complied with the requirements of the legislation and the SOPs.

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 reference number for sheep was not always recorded on the ante and post-mortem forms at the two establishments visited.

The lairage in both of the establishments visited was adequate for carrying out ante-mortem inspection. However, there was no boot-wash facility available in one of the establishments.

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. A number of bovine and ovine carcasses were inspected in the chill in the second establishment. The carcasses had been dressed hygienically; however, health marks were not clearly legible. However, the county veterinary officer and the TVI advised of the difficulty in applying clearly legible health marks when carcasses are cooling or already chilled.

The official control staff at one of the establishments did not have detention labels at the establishment but a separate rail was available in the establishment for detaining carcasses. Ink for staining condemned meat and forms for recording condemnation of carcasses were available in both establishments.

Batching of offal was being carried out at one of the establishments visited, and the application to carry out this activity, which was submitted in May 2012, was verified during the audit. However, at the time of the audit, Kerry County Council had not yet written to the food business operator with regards to granting of this application.

The systems in place in both establishments for the correlation of offal with the corresponding carcass were satisfactory; with the system in the second establishment being particularly good.

6. CONCLUSIONS

The system and procedures in place in Kerry 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 official control staff sign a declaration that they have received and read the documented procedures relevant to their work.
2. There were a number of authorisations under the FSAI Act which were incorrectly dated. These authorisations should be re-issued by Kerry County Council.
3. The National Sheep Identification System reference should be recorded on the ante and post-mortem forms in all approved slaughterhouses.
4. 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.
5. Effective boot-wash facilities should be available at all approved slaughterhouses.
6. Detention labels should be available to official control staff at all approved slaughterhouses.
7. The application of health marks in the second establishment should be reviewed to ensure that the health mark is legible.

8. CORRECTIVE ACTION TAKEN FOLLOWING ON-SITE ACTIVITY

Following the on-site activity undertaken on July 3rd and 4th 2012, Kerry County Council carried out a number of corrective actions, to address the preliminary audit findings, which had been outlined at the closing meeting.

These corrective actions included writing to each of the TVIs and substitute TVIs to outline the findings of the audit and the corrective actions to be undertaken by the TVIs. The letter to TVIs included the following:

- A declaration was provided to each TVI to state that they had received and read the SOPs relevant to their work. It was requested that each TVI sign and return this declaration without delay
- TVIs and substitute TVIs were reminded of their responsibilities to record any condemnations, including offal, on the ante and post-mortem forms. Kerry County Council also noted that the low incidence of condemnation in some slaughterhouses was a reflection of the quality of stock, age of stock, time of year and good farming practices in County Kerry
- TVIs were reminded that they should have boots designated solely for post-mortem work
- TVIs were requested to ensure that detention labels and detention facilities are available to them at each inspection
- TVIs were reminded, notwithstanding the difficulty associated with applying health marks to cold carcasses; that every care should be taken to make each application of the health mark legible.

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- Each TVI was requested to ensure that there were adequate boot-wash facilities at each of the approved slaughterhouses under their care
- TVIs were requested to include the National Sheep Identification and the ER 106 reference numbers on the ante and post-mortem forms

Kerry County Council advised that those authorisations which were incorrectly dated were amended following the audit. Copies of the amended authorisations were provided to the FSAI. All food business operators who had requested permission to batch offal were responded to and granted permission to do the same, by Kerry County Council, following the audit. Copies of the letters to the food business operators, granting permission to batch offal, were provided to the FSAI. Kerry County Council advised that a boot-wash facility has been installed at the establishment in question.



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