

AUDIT
REPORT

Audit of Official Controls
related to Liquid Milk
Establishments –
Department of Agriculture,
Food and the Marine

CORRECTIVE ACTION PLAN

FEBRUARY 2015 (UPDATED NOVEMBER 2016)

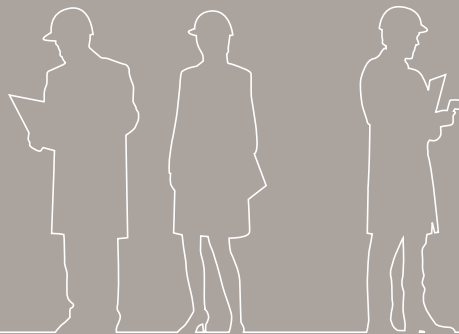


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This corrective action plan describes audit findings requiring corrective action, documents responsibility for addressing the findings and describes progress on the close out of actions.

Audit: Audit of Official Controls related to Liquid Milk Establishments

Official Agency: Department of Agriculture, Food and the Marine (DAFM)

Date of Audit: January – April 2014

CORRECTIVE ACTION PLAN

	To be completed by the FSAI		To be completed by the Agency		To be completed by the Agency & the FSAI through Service Contract Liaison process		
	Report Ref.	Finding Requiring Corrective Action	Proposed Corrective Action	Proposed Completion Date	Update	Status	
						Open	Closed (include date closed out)
1	4.1.4	In one instance in the Eastern region in 2013, the audit team observed that the Veterinary Public Health Inspection Service veterinary inspector risk-assessed score had been incorrectly calculated for one establishment. It had not taken into account the results of enforcement action which should have resulted in an increase in visit frequency for this food business operator.	A reminder has been sent to the regional staff for an update (DAFM 31/03/2015 & 17/04/2015)	April 2015	The risk assessment has been revised and corrected and closed off (DAFM 17/04/2015)		(DAFM update 17.4.15) – now closed

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2	4.1.4	SOP 17/2012 did not detail following completion of audits, where the supporting audit documents used as part of veterinary inspector audits should be retained and by whom. In one case, the contemporaneous notes and audit checklists were not available during the FSAI audit as the veterinary inspector had moved to another section of DAFM.	SOP 17/2012 has been updated considerably to include specific milk plant details. It is at an advanced stage (DAFM 31/03/2015 & 17/04/2015).	April 2015	DAFM confirmed that all Veterinary Public Health Inspection Service issues are now closed with the implementation of SOP 17/2012 (Revision to SOP <u>4/9/15</u>) SOP 2/2015 Enforcement Procedures at Approved Meat and Milk Pasteurising Premises Also deals with the taking/keeping of contemporaneous notes		(DAFM update 18/11/2015) – now closed

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3	4.1.4	For one establishment veterinary inspector audit carried out in the Veterinary Public Health Inspection Service Eastern region, the <i>aide memoires</i> and contemporaneous notes completed during the audit, had not been kept on file as per SOP 17/2012 requirements.	A reminder has been sent to the regional staff for an update (DAFM 31/03/2015).	April 2015	Contemporaneous notes of subsequent audits are now kept on file (<u>DAFM 17.4.15</u>).		(DAFM update 17.4.15) – now closed
4	4.1.4	The audit team observed that in a number of cases, veterinary inspector audits had not detected some important deficiencies at liquid milk establishments and consequently, the audits for these establishments were not considered as being fully effective.	SOP 17/2012 has been updated considerably to include specific milk plant details. It is at an advanced stage (DAFM 31/03/2015 & 17/04/2015).	April 2015	DAFM confirmed that all Veterinary Public Health Inspection Service issues are now closed with the implementation of SOP 17/2012 (<u>Revision to SOP 4/9/15</u>)		(DAFM update 18/11/2015) – now closed

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5	4.1.4	Water samples were being taken to check for microbiological parameters in accordance with Milk SOP 1/2006 requirements, with the exception of one medium-sized liquid milk establishment in the Eastern region, which had been sampled in 2012 but not in 2013.	A reminder has been sent to the regional staff for an update (DAFM 31/03/2015).	April 2015	Water samples are now taken in accordance with SOPI/2006 (DAFM 17/04/2015).		(DAFM update 17.4.15) – now closed
6	4.14	For two establishments, the sampling requirements of the Milk SOP1/2006 for chemical testing of water were not met.	Four of six plants have closed out all non-compliances in the food business operator reports. Updates on the other two have been requested (DAFM 31/03/2015). <i>Not clear from the plant reports which two this applies to. (DAFM 31/03/2015) FSAI forwarded details of the two establishments on 08/04/2015</i>	April 2015	Water samples are now taken in accordance with SOPI/2006 (DAFM 17/04/2015).		(DAFM update 17.4.15) – now closed

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7	4.1.4	The audit team was informed that it was proving difficult to carry out unannounced official controls at liquid milk establishments, which could not be considered as fully meeting the requirements of Article 3 (2) of Regulation (EC) No 882/2004.	SOP 17/2012 is being amended to provide for unannounced inspections. (DAFM 31/03/2015 & 17/04/2015)	April 2015	DAFM confirmed that all Veterinary Public Health Inspection Service issues are now closed with the implementation of SOP 17/2012 (Revision to SOP 04/09/2015) A minimum of two unannounced inspections are required to be carried out per year at all ready-to-eat establishments.		(DAFM update 18.11.15) – now closed

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8	4.1.5	In the Veterinary Public Health Inspection Service regions visited, it was unclear as to what aspects of the previous Milk SOP1/2006 were obsolete or should still be retained and/or be used for the performance of official controls at liquid establishments. Several aspects remained relevant but had not been incorporated into the new audit procedure and/or associated checklists.	SOP 17/2012 has been updated considerably to include specific milk plant details. It is at an advanced stage (DAFM 31/03/2015 & 17/04/2015).	April 2015	DAFM confirmed that all Veterinary Public Health Inspection Service issues are now closed with the implementation of SOP 17/2012 (Revision to SOP 04/09/2015)		(DAFM update 18/11/2015) – now closed
9	4.1.5	The audit team observed variation in the use of certain forms and checklists, which related to Milk SOP 1/2006, and which had been replaced by SOP 17/2012. These were still being used in certain Veterinary Public Health Inspection Service regions audited whilst not in others. Consequently, an inconsistent approach regarding their application was observed.	SOP 17/2012 has been updated considerably to include specific milk plant details. It is at an advanced stage (DAFM 31/03/2015 & 17/04/2015)	April 2015	DAFM confirmed that all Veterinary Public Health Inspection Service issues are now closed with the implementation of SOP 17/2012 (Revision to SOP 04/09/2015)		(DAFM update 18/11/2015) – now closed

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10	4.1.5	During the audit of DAFM official controls at central level, it was unclear as to whether certain Veterinary Procedural Notices were still required to be used or remained relevant for the performance of official controls at liquid milk establishments. As a result, variations were observed by the audit team regarding their use at liquid milk establishments for 2012 and 2013 which was viewed as inconsistent.	Revocation of the Veterinary Medicines Veterinary Procedural Notices is being considered in light of the review of SOP 17/2012. (DAFM 31/03/2015 & 17/04/2015)		DAFM confirmed that all Veterinary Public Health Inspection Service issues are now closed with the implementation of SOP 17/2012 (Revision to SOP 04/09/2015)		(DAFM update 18/11/2015) – now closed
11	4.1.5	DAFM checklists associated with SOP 17/2012 are in many cases, not appropriate or relevant for liquid milk establishments to be audited and could not be considered as fully comprehensive or fit for purpose. The lack of detailed and specific checklists for the performance of veterinary inspector audits in liquid milk establishments cannot ensure that a consistent and uniform approach for assessments is carried out.	SOP 17/2012 has been updated considerably to include specific milk plant details. It is at an advanced stage (DAFM 31/03/2015 & 17/04/2015)		DAFM confirmed that all Veterinary Public Health Inspection Service issues are now closed with the implementation of SOP 17/2012 (Revision to SOP 04/09/2015)		(DAFM update 18/11/2015) now closed

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12	4.2.2	The audit team observed in one instance, because of a lack of internal communication within DAFM, several antibiotic non-compliant results for one herd owner in 2013 were not conveyed by DAFM's Veterinary Medicines Division at central level to the District Veterinary Office at regional level. Consequently, no specific inspections were scheduled by the District Veterinary Office for this herd owner in 2013.		Q1 2014	DAFM's Veterinary Medicines Division has put in place, a procedure under the Self-Monitoring regime to report multiple positive results from the same herd owner to the regional office for follow-up action and/or targeting of the herd for inspection. The full list of non-compliances is also issued to feed into the regional office risk-based schedule of farm visits for the following year.		Q1 2014 (DAFM update 17/04/2015) – now closed

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13	4.2.3	In some cases, the audit team observed that inspections did not always take place within the five-day period, i.e. as per DAFM Circular ER 06/09 requirements.	It is unusual for visits not to take place but it can happen due to staffing/ additional controls, average delay is 10%. Staff will be reminded again of the five day goal. (DAFM 31.3.15)	16/02/2015	Closed out (DAFM 17/04/2015)		(DAFM update 17/04/2015) – now closed

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14	4.2.3	In some cases, the audit team observed delays between communications by the district veterinary office to the herd owner and the milk purchaser.	An automatic email notification system is being implemented to notify the milk purchaser which will ensure timely notification. (DAFM update 31/03/2015 - Proposed Corrective action by 06/04/15) District Veterinary Offices will be reminded of the requirement to contact the herd owner in a timely manner once notification of a positive test is received from testing vet. (DAFM update 31/3/15 - Proposed Corrective action by 06/04/15)	March 2016	ERAD Circular 1/2016 on Notifying the Milk Purchaser of Herd Restriction and De-Restriction has been issued.		(DAFM update 17/04/2015) – now closed

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15	4.2.3	During contact between the District Veterinary Office and the herd owner (in relation to positive bTB test), the herd owner in these cases is asked by District Veterinary Office staff to provide details about establishments being supplied with raw milk, i.e. from their farm where positive bTB animals have been identified. A log of calls was being kept only in one of the three District Veterinary Offices audited.	District Veterinary Offices will be reminded to log calls made to farmers in relation to the restriction of their herd.		(DAFM update 17/04/2015) – now closed		(DAFM update 17/04/2015) – now closed

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16	4.2.3	The lack of a requirement to record communication of the important advice by the private veterinary practitioner to the herd owner to withhold milk from supply in the case of a positive bTB result, is considered as a weakness in the current system of controls. The audit team's view is that this should be strengthened in the interest of public health/food safety and in order to ensure that objectives of Regulation (EC) No 853/2004 and (EC) No 854/2004 are met.	On foot of the FSAI recommendations, ERAD has investigated changes to be made to the hand-held recorders used by private veterinary practitioners during a test, that will (i) remind them to advise farmers about the milk restrictions and (ii) require them to confirm that they have provided the advice. The confirmation will become part of the test report to DAFM. (DAFM: 31/03/2015 & 17/04/2015)	2016	ERAD in communication with private veterinary practitioners	(DAFM update 20/04/2016) In Progress	

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17	4.2.3	The audit team confirmed that in general, communication by the herd owner with the milk purchaser at liquid milk establishments, i.e. in accordance with DAFM Trader Notice DH2/2012, does not happen in practice. In general, the milk purchaser and liquid milk establishment are informed about TB breakdowns, i.e. from farms supplying milk to them, via the ER122A notifications from the district veterinary office.	S.I. No. 58/2015 – Animal Health and Welfare (Bovine Tuberculosis) Regulations 2015 now make it a legal requirement for the herd-owner to notify the milk purchaser about TB breakdowns. Further discussion and analysis have taken place and ERAD circulars and DAFM Trader Notice to Milk Purchasers to be updated. (DAFM: 17/04/2015)	May 2015	The revised Trader Notice was issued in November 2015		(DAFM update 20/04/2016) – now closed
18	4.2.4	DAFM Circular ER 06/09 does not detail when a restricted herd visit report should be completed.	A restricted herd visit report should be completed when the breakdown ends. ER06/09 to be amended to reflect same.	27/02/15	(DAFM update 17/04/2015) – now closed		(DAFM update 17/04/2015) – now closed

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19	Annex I	<p>Food business operator controls performed in accordance with Regulations 178/2002, 852/2004 & 853/2004:</p> <p>The non-compliances identified by the FSAI audit team as part of the on-site verification activity should be closed out by DAFM in conjunction with the food business operators.</p>	<p>Four of six plants have closed out all non-compliances in the food business operator reports. Updates on the other three have been requested (DAFM: 31/03/2015)</p> <p>All plants have closed out all non-compliances in the food business operator reports (DAFM: 17/04/2015).</p>		(DAFM update 17/04/2015) - now closed		(DAFM update 17/04/2015) - now closed



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