

# AUDIT REPORT

Targeted Audit of Halal  
Claims on Meat and  
Poultry

SEPTEMBER 2021



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## 1. Glossary

FSAI	Food Safety Authority of Ireland
FBO	Food Business Operator

## 2. EXECUTIVE SUMMARY

The Food Safety Authority of Ireland (FSAI) has overall responsibility for the enforcement of food law in Ireland, which is predominantly carried out through service contract arrangements with the official agencies. The FSAI carries out targeted audits of food businesses to determine the level of compliance with food law and the effectiveness of its implementation.

This targeted audit of halal claims on meat and poultry was undertaken as part of the FSAI's programme of audits. Audits were conducted in 25 businesses between July 2019 and February 2020. The scope of the audit was to focus on the assessment of food business operators (FBOs) controls in place to verify any halal claims being made regarding products being produced or offered for sale. It did not assess the religious aspects of halal slaughter, nor the varying methods of slaughter that are considered to come under the classification of halal slaughter. Audits included assessments of FBOs' traceability and supplier controls related to halal meat and poultry. Each FBO was provided with an individual report following the audit of its business and these reports were copied to the relevant supervising official agency.

The audits commenced in consumer-facing food businesses. These included retail outlets with butchery counters, restaurants, hospital catering operations, butchers' shops as well as an airline caterer. During these audits, details of meat and poultry suppliers, labels and other documentation were collated. A substantial number of audit trails were developed to assess the validity of claims made regarding the halal status of the meat and poultry products examined. This involved audits of meat and poultry wholesalers, processors and slaughter plants.

Verification of the halal status of the selected meat and poultry back through the supply chain was conducted by tracing the batch and products to the processing and slaughter plants in the following manner:

- Verification that the wholesaler or processing plant handled halal meat or poultry.
- Traceability through the wholesaler or processor back to the slaughter plant.
- Verification that the plant in which the animal had been slaughtered conducted halal slaughter / was halal certified,
- Verification that the selected batch of meat or poultry identified in the consumer facing establishments originated from a halal batch in the relevant processing and slaughter plant.
- Traceability of the selected batch back to the kill sheets in the slaughter plant.
- Verification of the attendance of halal certification bodies in the processing / slaughter plant.

At the onset of the Covid-19 pandemic a verification audit in one slaughter plant which had been identified as a supplier to several retailers, wholesalers and processors had not been carried out. Covid -19 restrictions prevented carrying out an audit to complete the verification of these supply chains. This food business has now closed.

The advertisement of halal claims by the consumer facing businesses took place in a number of ways; for example through general signage, display of certificates relating to the halal status of meat and poultry at the point of sale, on the menu or other business literature, by labelling, on their website or through social media, etc. The halal status of meat and poultry was typically indicated on commercial documentation or labels by the processors and slaughter plants. In the consumer-facing businesses, halal certificates had been provided to the FBOs in relation to the products supplied. In several instances, the certificates displayed at point of sale in the retail premises were not current. Of the five processors and slaughter plants, one was self-certified; sending their own personnel to supervise halal slaughter at supplying slaughter plants. The remaining four businesses audited were certified by a number of third-party halal certification bodies, and personnel from the certification bodies were on site during halal production or slaughter. In the businesses that handled halal and non-halal meat and poultry, there were effective operational and documented controls regarding the segregation, traceability and labelling of the different types of meat and poultry.

The outcome of this programme of audits was found to be in general satisfactory despite a number of legislative breaches. All, bar one, of the claims traced back to the slaughter plant regarding the halal status of meat were substantiated. The unsubstantiated claim was followed up with the relevant official agency. The consumer-facing businesses that were audited purchased halal meat and poultry from suppliers that were approved to conduct halal slaughter. The FBO controls at processing and slaughter plant level, relating to traceability and supply of halal meat and poultry, at the time of this audit, were found to be effective.

### 3. INTRODUCTION

The Food Safety Authority of Ireland (FSAI) has overall responsibility for the enforcement of food law in Ireland, predominantly through service contracts with Government Departments and official agencies. The FSAI carries out targeted audits of food businesses to determine the level of compliance with current food law and the effectiveness of its enforcement. This audit examined FBO controls in place to substantiate claims being made regarding products being produced or offered for sale as halal. The audit included the assessments of FBOs' traceability and documented and operational controls related to meat and poultry.

*Halal* is an Arabic word meaning lawful or permitted. In reference to food, it is the dietary standard, as prescribed in the Qur'an (the Muslim scripture). The term halal is commonly used in relation to food products, meat products, cosmetics, personal care products, pharmaceuticals, food ingredients, and food contact materials. In the meat and poultry food industry, animals such as cows, veal, lamb, sheep, goats, turkeys, chickens, ducks, game birds, bison, venison, etc, are considered halal, but they must be prepared according to Islamic laws in order for their meat to be suitable for consumption.

This audit focused on the assessment of halal claims being made on meat and poultry products. It did not assess the religious aspects of halal slaughter, nor the varying methods of slaughter that are considered to come under the classification of halal slaughter.

#### 3.1 Audit objective

The objective of the audit was to assess FBO compliance with food legislation with particular emphasis on the assessment of the validity of claims made regarding the halal status of products.

#### 3.2 Audit scope

The scope of the audit was to focus on the assessment of FBOs controls in place to substantiate any halal claims being made regarding products being produced or offered for sale. This included the assessment of FBOs' traceability and supplier controls related to halal meat and poultry. It also assessed compliance with the provisions of food law.

### 3.3 Audit criteria and reference documents

- [Food Safety Authority of Ireland Act, 1998](#) (S.I. No 29 of 1998), as amended.
- [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.
- [Commission Implementing Regulation \(EU\) No 931/2011](#) on the traceability requirements set by Regulation (EC) No 178/2002 of the European Parliament and of the Council for food of animal origin.
- [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.
- European Communities (Food and Feed Hygiene) Regulations, 2009 ([S.I. No 432 of 2009](#)), as amended.
- [Regulation EC \(No\) 854 of 2004](#) laying down specific rules for the organisation of official controls on products of animal origin intended for human consumption, as amended.
- European Communities (Food and Feed Hygiene) Regulations 2009 ([S.I. No 432 of 2009](#)), as amended.
- [Regulation \(EU\) 2017/625](#) on official controls and other official activities performed to ensure the application of food and feed law, rules on animal health and welfare, plant health and plant protection products, as amended.
- European Union (Food and Feed Hygiene) Regulations 2020 ([S.I. No. 22 of 2020](#)).
- [Regulation \(EU\) No.1169/2011](#) on the provision of food information to consumers.
- [Statutory Instrument No. 556 of 2014](#), European Union (Provision of Food Information to Consumers) Regulations 2014.
- European Communities (Official Control of Foodstuffs) Regulations 2010 ([S.I. 117 of 2010](#)) as amended.
- European Communities (Hygiene of Foodstuffs) Regulations 2006 ([S.I. No. 369 of 2006](#)), as amended.
- European Communities (General Food Law) Regulations 2007 ([S.I. 747 of 2007](#)), as amended.

### 3.4 Audit methodology

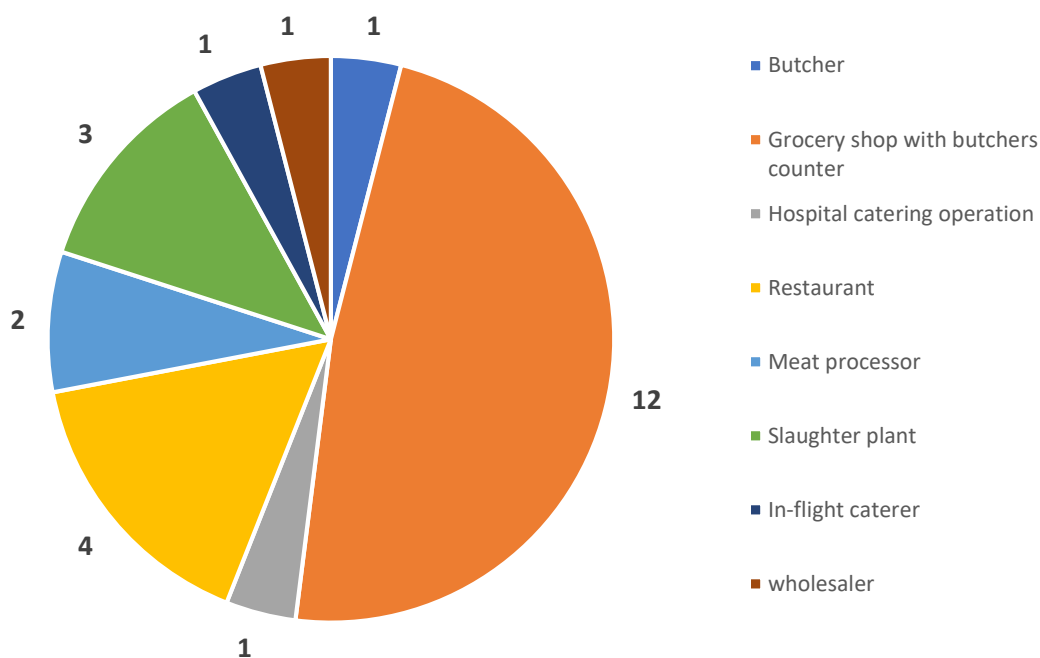
This audit was undertaken using documented procedures which are included in the FSAI Business Management System, namely the FSAI Audit Procedure and Charter. These procedures implement the FSAI's audit obligations and are in accordance with the requirements of Regulation 2017/625(Article 6), Regulation 882/2004 (including Article. 6.1 of Commission Decision 677/2006), and Section 48 (9) of the FSAI Act. The audit focused on the assessment of halal claims being made on meat and poultry products. It did not assess the religious aspects of halal slaughter, nor the varying methods of slaughter that are considered to come under the classification of halal slaughter.

The audit team assembled a list of those FBOs selling halal meat and poultry. From this, following a review of halal products being sold and taking account the scale, range and types of businesses, a list of potential food businesses to be audited was generated. Food businesses were subsequently selected for audit and included retail outlets, hospital catering operation, butchers, restaurants and airline caterers. The food businesses were selected in order to provide a relatively broad overview of premises offering halal meat and poultry for sale.

On-site activity took place between July 2019 and February 2020. On arrival at each food business the rationale and scope of the audit was explained to the operator as part of the opening meeting. Twenty-five food business operations were audited in total. The audits commenced in consumer-facing food businesses. These included retail outlets with butchery counters, hospital catering operation, restaurants, butchers' shops as well as an airline caterer. Following the audits in the consumer-facing businesses, details of meat and poultry suppliers, labels and other documentation were collated. A substantial number of audit trails were developed to assess the validity of claims made regarding the halal status of those meat and poultry products. This involved audits of meat and poultry wholesalers, processors and slaughter plants. Audits took place in one wholesaler, two processors and three slaughter plants. The slaughter plants audited consisted of one that slaughtered beef, one that slaughtered lamb and one that slaughtered poultry.



Figure 1: Numbers and types of food businesses audited



Verification of the halal status of the selected meat and poultry back through the supply chain was conducted by tracing the batch and products to the processing and slaughter plants in the following manner:

- Verification that the wholesaler or processing plant handled halal meat or poultry.
- Traceability through the wholesaler or processor back to the slaughter plant.
- Verification that the plant in which the animal had been slaughtered conducted halal slaughter / was halal certified
- Verification that the selected batch of meat or poultry identified in the consumer facing establishments originated from a halal batch in the relevant processing and slaughter plant.
- Traceability of the selected batch back to the kill sheets in the slaughter plant.
- Verification of the attendance of halal certification bodies in the processing / slaughter plant.

During the audits of the 19 consumer-facing businesses, the following were evaluated; the halal status of the meat and poultry being sold in the premises and the suppliers of such meat and poultry, how claims regarding the halal status of meat and poultry were communicated to customers and consumers and the controls in establishments where both halal and non-halal meat and poultry were sold.

From the audits in the consumer facing businesses, it was clear that a relatively small number of processors and slaughter plants supplied many of the businesses audited. In each of the subsequent audits of processors and slaughter plants, specific batches of products were selected which had been identified in consumer-facing businesses, to trace back and assess the validity of halal claims being made.

During audits in which non-compliances with legal requirements were identified, the FBO was informed of these verbally at a closing meeting and was required to implement corrective actions. Subsequently a report detailing the outcomes and findings of the audit was sent to each FBO. At the onset of the Covid-19 pandemic a verification audit in one slaughter plant which had been identified as a supplier to several retailers, wholesalers and processors had not been carried out. Covid -19 restrictions prevented carrying out an audit to complete the verification of these supply chains. This food business has now closed.

## 4. AUDIT FINDINGS

### 4.1 Halal certification

In the consumer-facing businesses, halal certificates had been provided to the FBOs in relation to the products supplied. Some of these were self-certification, where the supplier provided a document stating that the products supplied were halal. Other suppliers provided certificates from an external certification body, providing evidence of their halal status. These certificates and documents were in the main generic, rather than batch specific, and covered a specific time period. In several instances, the certificates displayed at point of sale in the retail premises were not current. When requested to supply current certificates, all the FBOs did so.

Of the five processors and slaughter plants providing certificates to consumer facing businesses, one was self-certified; sending their own personnel to supervise halal slaughter at supplying slaughter plants. The remaining four businesses audited were certified by a number of third-party halal certification bodies, and personnel from the certification bodies were on site during halal production or slaughter.

### 4.2 Premises handling halal and non-halal products

There were only three consumer facing businesses that handled both halal and non-halal products. In one case, the halal product was sold in the original packaging, with the supplier labelling. In the

other two consumer-facing business, there were well-documented controls in place regarding segregation, traceability and labelling of halal and non halal meat and poultry products. These controls were included in the food safety management system and the corresponding records were maintained.

In each of the five meat processors and slaughter plants, there were documented and operational procedures in place to ensure segregation of halal and non-halal slaughtered products. These had been documented as part of the food safety management system and records were maintained. In one slaughter plant the documented procedures did not fully reflect the operational controls in place, in that there were additional controls implemented in the event of a halal carcass being declared as non-halal. The FBOs controls relating to halal products, at the time of this audit, were found to be effective.

### 4.3 Advertisement of halal claims made regarding meat and poultry

The advertisement of halal claims by the consumer facing businesses took place in a number of ways; for example through general signage, display of certificates relating to the halal status of meat and poultry at the point of sale, on the menu or other business literature, by labelling, on their website or through social media, etc.

The halal status of meat and poultry by the processors and slaughter plants was typically indicated on commercial documentation or labels.

### 4.4 Verification of halal claims

In the consumer facing businesses, the labels and commercial documents for meat and poultry for which halal claims were being made were reviewed as an initial step. This included assessing the approval details for the relevant cutting and slaughter plants to see whether or not these plants were authorised to conduct halal slaughter. In all cases it was found that they were authorised to conduct halal slaughter.

The 19 consumer facing businesses audited were found to have common supply chains. Following assessment of the supply chains, those processors and slaughter plants supplying the greatest number of the consumer-facing business audited were identified. A representative sample of

products was taken to verify the halal claims being made and was traced back to through wholesalers or processors to the slaughter plant of origin.

Due to the onset of the Covid-19 pandemic and subsequent closure of one slaughter plant, which had been identified as a supplier to several retailers, wholesalers and processors, verification of several supply chains back to this plant and the associated halal claims was not possible.

Traceability for the selected products included assessment of commercial documents, linkage of batch numbers from the consumer-facing business, back through the processor's records to incoming carcasses or specific product batches from the slaughter plant. This included tracing the batch and products through the processor or wholesaler to the slaughter plant.

In each of the three slaughter plants audited, the slaughter was predominantly halal. There were some small quantities of non-halal slaughter, associated with specific product lines or casualty animals.

Following the traceback of selected batches of product from the 19 consumer-facing businesses, the halal claims made by them were substantiated, in all but one case. The unsubstantiated claim was followed up with the relevant official agency.

### 4.5 Breaches of legislation

A total of nine breaches of the following legislative requirements were observed during the programme of audits in the 25 food businesses.

- Three breaches of Article 5 of Regulation (EC) No 853/2004 on the hygiene of foodstuffs, relating to hazard analysis and critical control point system. These three breaches related to documented controls not being fully reflective of the operational controls in place.
- Six breaches of Article 7(2) of Regulation (EU) No 1169/2011, on the provision of food information to consumers, which requires that food information shall be accurate, clear and easy to understand for the consumer. These six breaches related to the display of certificates regarding the halal status of meat provided by suppliers at the point of sale.

## 5. POSITIVE PRACTICES OBSERVED DURING THE AUDIT

The approach taken by the hospital catering operation, which had a number of competing customer and dietary requirements was noteworthy. Requests by customers for halal meals, were treated in the same manner as special dietary requirements; which encompass any meal request related to allergens, halal, renal and diabetic diets and other specific dietary related meals. These special dietary requests are prepared in a designated area of the kitchen, with enhanced cross-contamination and labelling controls in place. These controls are implemented and included in the documentary procedures for the kitchen staff, who are knowledgeable in regard to the controls and how to implement them.

## 6. CONCLUSIONS

The outcome of this programme of audits was found to be satisfactory despite a number of legislative breaches. All, except one of the claims traced back to the slaughter plant regarding the halal status of meat were substantiated. The consumer-facing businesses that were audited purchased halal meat and poultry from suppliers that were approved to conduct halal slaughter. The FBO controls at processing and slaughter plant level, relating to traceability and supply of halal meat and poultry, at the time of this audit, were found to be effective.

Due to the onset of the Covid-19 pandemic and subsequent closure of one slaughter plant, which had been identified as a supplier to several retailers, wholesalers and processors, verification of several supply chains back to this plant and the associated halal claims was not possible.

Following audits in which non-compliances with legal requirements were identified, the FBO was informed of these non-compliances and was required to implement corrective actions.

## 7. RECOMMENDATIONS

One recommendation is made as a result of this audit:

- Food businesses making claims with regards to the halal status of the meat and poultry they sell, should ensure that the information provided to consumers at point of sale is accurate and up to date.



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