

AUDIT
REPORT

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

NOVEMBER 2012



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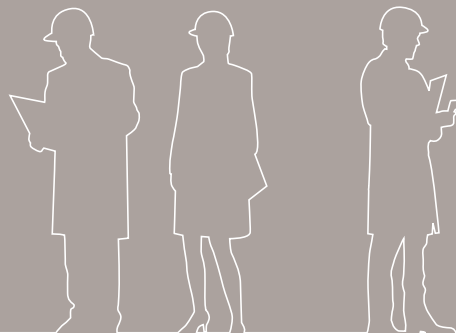


Table of Contents

1.	GLOSSARY	2
2.	EXECUTIVE SUMMARY	3
3.	INTRODUCTION.....	5
	3.1. Audit Objective	5
	3.2. Audit Scope.....	5
	3.3. Audit Criteria and Reference Documents	6
	3.4. Audit Methodology	6
4.	OFFICIAL CONTROLS PERFORMED IN ACCORDANCE WITH REGULATION 882/2004	7
	4.1. Organisation and Structure of Official Controls.....	7
	4.2. Coordination and Planning of Official Controls	7
	4.3. Documented Procedures	7
	4.4. Staff Performing Official Controls	8
	4.5. Official Controls carried out by Temporary Veterinary Inspectors	9
	4.6. Communications with Food Business Operators	10
5.	OFFICIAL CONTROLS PERFORMED IN FOOD ESTABLISHMENTS.....	10
6.	CONCLUSIONS.....	11
7.	RECOMMENDATIONS.....	12

1. GLOSSARY

FSAI	Food Safety Authority of Ireland
SOP	Standard Operating Procedure
TVI	Temporary Veterinary Inspector

2. EXECUTIVE SUMMARY

The Food Safety Authority of Ireland (FSAI) is responsible for the enforcement of all food legislation in Ireland, which is carried out through service contracts with official agencies. As part of its legal mandate, the FSAI is required to verify that the system of official controls is working effectively. For the purposes of assessing the delivery of official controls by Kildare 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 Kildare 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. Kildare County Council made use of these standard documented procedures and had circulated them to the temporary veterinary inspectors. Both 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 and were experienced in conducting ante and post-mortem inspections. The official control tasks observed during the on-site verification work complied with the requirements of the legislation and the standard operating procedures. However, some deficiencies were noted in the second establishment.

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 clear. A number of bovine and ovine carcasses and pork shoulders were inspected in the chill in the other establishment. The audit team noted that the carcasses had been well dressed; however, health marks on the bovine carcasses, some ovine carcasses and the pork shoulders were not clearly legible¹.

The official control staff at one of the establishments did not have detention labels at the establishment², but a chain and lock was available in the establishment for detaining carcasses.

The official control staff recorded offal condemnations on the post-mortem forms, and evidence of this was available in both establishments visited.

Batching of offal was being carried out at both establishments visited, and the documentation regarding this practice, including the application and letter granting permission from Kildare County Council was verified during the audit.

¹ Kildare County Council advised that full legibility of health marks would be improved upon.

² Kildare County Council advised that all TVIs have since been supplied with detention labels.

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

NOVEMBER 2012

Carcases and corresponding offals were not being correlated using a defined numbering system in one of the establishments visited³.

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

The official veterinarian (temporary veterinary inspector (TVI)) is obliged under Regulation (EC) No 854/2004 to verify compliance with the food business operator's duty under Regulation (EC) No 853/2004 to ensure that animals are clean enough to enable hygienic dressing. Hygienic dressing by the food business operator could not be assessed by the TVI as carcasses were being washed prior to post-mortem inspection⁴.

The first establishment was a real example of best practice in operation, with regards to food business operator procedures and official controls.

The system and procedures in place in Kildare 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 Kildare County Council advised that the food business operator has implemented a numbering system for carcase and offal correlation.

⁴ Kildare County Council advised that this was an isolated incident and that the food business operator has been requested to ensure that all operatives are fully trained for the work assigned to them.

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. Kildare 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 Kildare County Council, this audit focused on official controls undertaken by TVIs. Compliance by the local authority (Kildare 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 Kildare 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 Kildare 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 Kildare 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 Kildare 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
- Kildare 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 Kildare 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 Kildare County Council. The purpose of the pre-audit questionnaire was to collate and confirm information regarding official controls and documented procedures within Kildare 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 26th June & 27th June Wednesday 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 Kildare 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 being undertaken by the TVIs at these establishments. The audit focused on ante and post-mortem inspections, including associated checks and tasks carried out under Regulation (EC) No 854/2004.

A closing meeting was held at the end of the audit; the purpose of which was to outline the main findings from the audit. The findings were discussed and Kildare 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

Kildare 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 Kildare are delivered by the county veterinary officer, with the assistance of TVIs. There is also a part-time veterinary officer who provides assistance to and cover for the county veterinary officer, as required.

Within the Kildare County Council functional area, there are four approved slaughterhouses which are supervised by the local authority. Kildare 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 four 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 Kildare 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 Kildare County Council, these tasks are typically carried out by TVIs. Arrangements are made between the local authority and the food business operator in relation to slaughter times and the associated official controls. Details of these arrangements were verified in two establishments visited as part of the on-site verification work, during the audit.

4.3. Documented Procedures

Article 8 of Regulation (EC) No 882/2004 requires that competent authorities carry out their official controls in accordance with documented procedures containing information and instructions for staff, and must keep these procedures up-to-date.

A standardisation working group develops and reviews documented procedures, to be followed by local authority veterinary inspectors while carrying out official controls. There are a number of standard operating procedures (SOPs), which have been developed by this standardisation working group, which are relevant to this audit.

These include:

- SOP A1: Veterinary Ante-mortem Procedure
- SOP A2: Veterinary Post-mortem Procedure
- SOP A5: Verification of Official Controls for Trichinella in Meat
- SOP A6: Slaughterhouse Inspection/Audits
- SOP A9: Operation of Animal Identification and Movement System
- 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

Kildare County Council makes use of the relevant SOPs and uses the ante and post-mortem forms provided as part of SOPs A1 & A2. During visits to the two establishments, the use of the ante and post-mortem forms by the official control staff was verified.

Copies of the documented procedures are provided to the staff carrying out official controls. The official control staff in the two establishments visited confirmed that they had been provided with a copy of the relevant SOPs by the local authority. The official control staff were familiar with the content of these SOPs and both TVIs had copies of the SOPs at the establishments. 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 882/2004 requires that the competent authority shall ensure that all of its staff performing official controls receive, for their area of competence, appropriate training enabling them to undertake their duties competently and to carry out official controls in a consistent manner. Staff performing official controls keep up to date in their area of competence and receive regular additional training as necessary and have aptitude for multidisciplinary cooperation.

The veterinary services team in Kildare County Council comprises one county veterinary officer and three TVIs. There is also a veterinary officer who provides assistance to and cover for the county veterinary officer, as required and administrative support is provided. The three 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, two of the TVIs cover for each other, and there is one deputy TVI who also provides cover. The deputy TVI is provided with equipment, legislation and other information relevant to their official control duties, by the TVI for whom they are providing cover.

Kildare County Council had, at the time of this audit, Section 85⁵ orders in place 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 Kildare County Council.

Training and supervision of the official control staff by Kildare County Council is provided through a series of meetings, which are held with each of the TVIs individually and tailored to the specific requirements of that staff member. Meetings take place throughout the year, typically three times a year. Kildare County Council provides official control staff with updates on legislation, documented procedures and other relevant issues at these meetings. This system could be strengthened by maintaining records of these meetings and by having the county veterinary officer and TVI sign them. Kildare County Council also arranged for the regular TVIs to attend a training course on HACCP.

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. Official condemnations were recorded on the post-mortem forms and evidence of this was seen in the two establishments visited.

The official control staff in the two establishments visited demonstrated a familiarity with the relevant documented procedures for carrying out these duties and were experienced in conducting ante and post-mortem inspections.

4.5. Official Controls carried out by Temporary Veterinary Inspectors (TVIs)

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

The TVIs report back to Kildare 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. Kildare County Council carries out a correlation exercise for the slaughter returns, between ante and post-mortem forms, permission to slaughter forms (ER106s) and the food chain information as part of the monthly audits carried out by the county veterinary officer in each of the slaughterhouses. If there are any discrepancies in the returns, it would be addressed between Kildare County Council and the TVI, and any errors would be corrected. No issues with regards to the timeliness of returns from the TVIs or the local authority were identified from the paperwork reviewed.

⁵ 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.

4.6. Communications with Food Business Operators

Article 9 of Regulation (EC) No 882/2004 requires that the competent authority provides the food business operator with a copy of the report on official controls carried out, at least in case of non-compliance.

Kildare County Council and TVIs in the two establishments advised that verbal feedback is provided to the food business operator following official control duties, and this was confirmed by the two food business operators. Copies of the completed ante and post-mortem forms are left for the food business operator. If a non-compliance arose in an establishment, which required corrective action, it is in the first instance communicated verbally to the food business operator.

If the TVI deemed it appropriate, or if corrective action was not satisfactory, the issue would be communicated to the local authority for appropriate follow-up. 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 Kildare County Council. The audit team was 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 very 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 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 deficiencies were noted in the second establishment.

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 recording of animal identification and offal condemnations on the ante and post-mortem forms in both establishments was comprehensive. The forms were also being signed routinely by the food business operators in both establishments.

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

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 clear. A number of bovine and ovine carcasses and pork shoulders were inspected in the chill in the other establishment. The audit team noted that the carcasses had been well dressed; however, health marks on the bovine carcasses, some ovine carcasses and the pork shoulders were not clearly legible⁶.

⁶ Kildare County Council advised that full legibility of health marks would be improved upon.

The official control staff at one of the establishments did not have detention labels at the establishment⁷, but a chain and lock 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. The official control staff recorded offal condemnations on the post-mortem forms, and evidence of this was available in both establishments visited.

Batching of offal was being carried out at both establishments visited, and the documentation regarding this practice, including the application and letter granting permission from Kildare County Council was verified during the audit.

Carcasses and offals (heads, livers and plucks) were not being correlated using a defined numbering system in one of the establishments visited. A numbering system should be implemented to minimise the risk of error in correlation of carcasses and corresponding offal should lesions/abnormalities be detected⁸.

The official veterinarian (TVI) is obliged under Regulation (EC) No 854/2004 to verify compliance with the food business operator's responsibility under Regulation (EC) No 853/2004 to ensure that animals are clean enough to enable hygienic dressing. Hygienic dressing by the food business operator could not be assessed in one of the establishments by the TVI as carcasses were being washed prior to post-mortem inspection⁹.

The first establishment visited was a real example of best practice in operation, with regards to food business operator procedures and official controls.

6. CONCLUSIONS

The system and procedures in place in Kildare 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 Kildare County Council advised that all TVIs have since been supplied with detention labels.

⁸ Kildare County Council advised that the FBO has implemented a numbering system for carcase and offal correlation.

⁹ Kildare County Council advised that this was an isolated incident and that the food business operator has been requested to ensure that all operatives are fully trained for the work assigned to them.

7. RECOMMENDATIONS

1. The system relating to provision of documented procedures to official control staff could be strengthened by having the official control staff sign a declaration that they have received and read the documented procedures relevant to their work.
2. Records of the meetings held with official control staff throughout the year should be maintained, and should be signed by the county veterinary officer and TVIs in attendance.
3. Detention labels should be available to official control staff at all approved slaughterhouses.
4. The application of health marks in the second establishment should be reviewed to ensure that the health mark is legible.
5. The system in the second establishment for correlation of offal should be reviewed to minimise the risk of error in correlation of offal and carcasses should lesions/abnormalities be detected.
6. The county veterinary officer should ensure that carcass washing does not take place prior to post-mortem inspection, to ensure that hygienic dressing by the food business operator can be assessed by the TVI.



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