

AUDIT
REPORT

Audit of Official Controls in
Horticultural Produce Sector
– Department of Agriculture,
Food and the Marine

CORRECTIVE ACTION PLAN

OCTOBER 2016 (UPDATED NOVEMBER 2016)

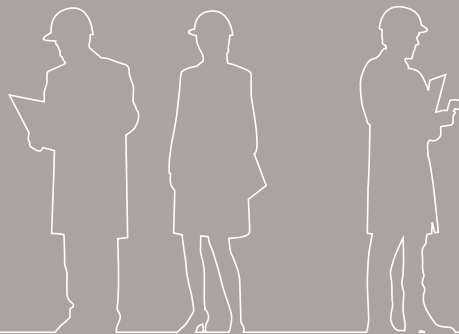


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This corrective action plan describes audit findings requiring corrective action, documents responsibility for addressing the findings and describes progress on the close out of actions.

Audit: Audit of Official Controls in Horticultural Produce Sector

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

Date of Audit: April – May 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	4.1.1	There is a shortfall in staff resources to meet necessary inspection targets and sampling.	A formal request for additional staff resources in a dedicated Food Safety Unit within the division has been submitted to senior management.	Completed	One assistant agricultural inspector has been appointed (DAFM update 07/07/2015). Inspections and target samples for 2015 are currently being met (DAFM update 07/07/2015). DAFM horticulture has however, submitted formal requests for additional posts to meet legislative requirements (assistant agricultural inspector/agricultural inspector).		Closed 07/07/2015
2	4.1.1&	Access to laboratory facilities is very limited with regard to capacity for sample numbers and the	Discussions are taking place with DAFM laboratory	End December	Additional laboratory capacity is now		Closed

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	4.1.2	time period for submitting samples.	management with a view to having additional laboratory capacity in place for horticulture inspectorate samples.	2014	provided and all samples are analysed by the Dairy Science Laboratory (via the Central Veterinary Research Laboratory) for STEC/VTEC (DAFM update 07/07/2015). DAFM horticulture is now included in the DSL business plan for 2015 (DAFM update 07/07/2015).		07/07/2015
3	4.1.3	Two establishment registers are maintained by DAFM and have significant differences.	The Crop Policy, Production and Safety Division (CPPSD) provides		All food business operators that are primary producers		Closed January

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			<p>administrative support to the horticultural inspectorate and is charged with maintaining the register of clients in the horticulture space.</p> <p>CPPSD is currently carrying out a new Horticulture Survey which will replace current register and will be the sole repository of registration information for horticulture clients. In order to ensure completeness and accuracy, the survey results will be cross-referenced with other DAFM-based information sources, e.g. SPS, Organics Register etc.</p>	End August 2014	<p>(including potato growers) are now registered on the CPPSD database(DAFM update 07/07/2015).</p> <p>Survey was completed in January 2015.</p> <p>The registration form has been modified so that all information looked for in the survey is now recorded in the new registrations (DAFM update 07/07/2015).</p>		2015

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			Both divisions have submitted a request for a new integrated database covering the register (CPPSD) and inspections/risk rating (HPHD). Discussions have commenced with the CPPSD and IT division. New integrated database in place.	2015			
4	4.1.4	A high proportion of premises are not risk-categorised.	A new risk categorisation process has been initiated for all food business operators. Registered food business operators will all be given an initial ranking that will	Completed End August	All registered food business operators are risk categorised and the scheduling of official controls is based on this risk categorisation. Risk inspection plan for 2015 was		Closed February 2015

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			determine the frequency of inspection On-going risk categorisation will take place.	2014 On-going	developed in Feb 2015 (DAFM update 07/07/2015). Inspection plan & risk categorisation are included SOP:Hygiene Official Controls 2015 V1, Annex 1 & 3 (DAFM update 07/07/2015).		
5	4.1.4	Checks by the horticultural inspectorate for non-hygiene areas of the service contract, e.g. additives, labelling, are not routinely carried out.	New checklists and procedures are being put in place to address this.	End August 2014	E learning (labelling module) has been completed by all assistant agriculture inspectors. (DAFM update 07/07/2015) <u>(Update:</u> The senior agricultural officers only carry out marketing standard		Closed 17/02/2016

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					checks on primary produce at retail outlets and therefore, do not need to complete. New checklists were developed now covering FIC labelling, i.e. Form 5: FIC Checklist, as part of SOP: Hygiene Official Controls 2015 V1 page 18-19). (Received FSAI 17/07/2015) Note: Additives to be included on DAFM checklists		
6	4.1.4	Inspection frequencies set down in DAFM procedures are not followed. Some high-risk establishments have not been inspected since	New monitoring arrangements in place to monitor inspection		Inspection frequencies for 2015 are being met. The excel spreadsheet inspection plan now allows for the		Closed 22/10/2015

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		2010 and 2011.	<p>frequencies by staff.</p> <p>The new procedures will outline the frequency of inspection for all food business operators. Additional staff resources, if provided, will ensure that inspection frequencies are met in the future.</p>	Completed End 2015 (implemented for 2015 inspection programme)	<p>monitoring by the agricultural inspector of inspections. (DAFM update 07/07/2015)</p> <p>DAFM to include the date the audit report was issued and the monitoring visits by DAFM on the newly developed excel spreadsheet.</p> <p>DAFM to forward the monitoring procedure to the FSAI</p>		
7	4.1.2	The suite of tests available for sample testing is limited, e.g. only sprouted seeds samples are tested for VTEC.	Discussions are taking place with DAFM laboratories and senior management regarding the available tests with a view to carrying out a VTEC	On-going	The number of samples has increased but currently, the only testing for VTEC/STEC is on sprouted seeds in		Closed 20/03/2015

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			survey in 2015. The Horticulture and Plant Health Division, in conjunction with the FSAI, will assess further risks from microbial pathogens in the fruit and vegetable sector.	End 2014	compliance with Regulation 209/2013 (Micro criteria) (DAFM update 07/07/2015) There is no requirement for food business operators other than producers of sprouts to test for VTEC. DAFM has formed a working group on VTEC to review lab resources for a survey to take place across all inspectorate (dairy etc.) (DAFM update 07/07/2015) SOP 002/2015		

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					Horticultural Produce Sampling, Testing, and Reporting of Results for Microbiological Analysis at Horticultural Food Businesses, shows required testing is carried out.		
8	4.2	The four Commission Regulations introduced to strengthen controls in sprouts and seeds have not been transposed.	The process of transposing the Regulations was initiated in 2013. Discussions are on-going with Legal Service Division.	End December 2014	S.I. No. 68/2014 is in place		Closed Q4 2014
	4.1.3	Establishments producing sprouts are not	The procedure for	End 2014	DAFM horticulture (admin) to complete		

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		approved in accordance with Commission Regulation 210/2013.	approving establishments has now been established. Awaiting completion of SI before implementing procedures.		the letters to be sent to food business operators to confirm their approval. Q3 2015 (DAFM update 07/07/2015) DAFM forwarded scan of letters		Closed 15/02/2016
9	4.1.9	More training is required for inspectors in certain areas e.g. micro criteria, to ensure staff are kept up to date in their areas of competence.	Regular training of inspectors is on-going. Specific training in micro-criteria will take place once the FSAI Guidance Note for enforcements officers is finalised. Additional training is also planned for labelling (including additives) and allergens.	On-going End of 2014	<u>GN 27 published in March 2014.</u> Four agricultural inspectors have completed the BTSF (FONAO) training on micro criteria (2073) in 2015. Remainder to complete as a priority. (DAFM update 07/07/2015) DAFM training for its		Closed 17/02/2016

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					own staff on 2073 will take place in Q4 2015 E learning also includes an additive module which should be completed by DAFM horticulture in 2015		Closed 18/02/2016
10	4.1.5	<p>There are no documented procedures in some areas:</p> <ul style="list-style-type: none"> Registration – maintenance of register of food business operators. 	<p>CPPSD has had specific procedures in place for registering clients under potato sector legislation for many years. CPPSD has now put in place procedures for the registration of food business operator clients for the other horticulture</p>	Completed	<p>Copy of procedure for registering businesses completed Q1 2015 SOP: Hygiene Official Controls 2015 V1, Section 8</p>		Closed Q1 2015

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		<ul style="list-style-type: none"> Enforcement – issuing and lifting of legal notices Non-hygiene areas of the service contract e.g. additives, labelling. 	categories. Documented procedures are now in place for enforcement. Procedures manual is being updated to include non-hygiene areas.	Completed September 2014	Compliance notice and report template received 23/03/2015 SOP: Hygiene Official Controls 2015 V1 includes checklists covering non hygiene areas where applicable (pages 18-19) (DAFM update 07/07/2015)		Closed Q1 2015 Closed 07/07/2015
11	4.1.6	Official controls did not identify a significant number of the non-compliances identified by the audit team during onsite activities including deficiencies in, e.g. HACCP, pest control	The audit findings have been carefully considered and are being addressed. Increased controls for food business operators that have been classified as high-risk are already being implemented and this has resulted in a food business operator being closed since	On-going	Official control procedure which includes the risk ranking received DAFM to forward numbers of food business operators meeting targets for 2015 DAFM forwarded		Closed 17/02/2016

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		Where non-compliances were identified and enforcement notices issued previously, re-inspections frequently did not occur until 1 year later and in a number of a cases the close-out was either by phone or by email correspondence.	<p>the FSAI audit.</p> <p>All inspectors will receive additional training, regarding HACCP and pest control.</p> <p>Changes have been made to the procedures to ensure that non-compliances are closed out in a timely manner.</p> <p>Additional staff, if provided, will ensure that non-compliances are closed out quickly.</p>	End 2014	<p>numbers</p> <p>A review meeting took place to review FSAI audit findings in order to discuss and address issues identified Q3 2014.</p> <p>A monitoring programme for inspections has been implemented to ensure consistency between inspections and to ensure inspectors are identifying all non-compliances SOP Hygiene Official Controls_2015_V1</p>		Closed Q3 2014

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				Completed	SOP No.005 section 8.3.2. which outlines the timeframe for corrective actions. Status is included in the system (inspections excel spreadsheet).		Closed 22/10/2015
12	4.1.7	A number of inspection reports were not issued for a significant time after inspections had taken place. There is no system in place for tracking unannounced inspections when they do occur.	Procedures have been amended to ensure that reports are completed within a short timeframe after inspection and that letters are issued by the inspecting officers. Subject to additional resources, more timely issuance of reports will	Completed	The majority of inspections are unannounced. The official control activity is not always announced, but where possible limited notification is given. All inspections are recorded on the system. Inspections reports		Closed 22/10/2015

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			follow. The provision of an integrated database as outlined above will facilitate such recording and monitoring of unannounced inspections.	2015	must be issued within two weeks of inspections as per SOP 005 (issue date 22/10/2015) Procedures (referencing unannounced) to be forwarded by DAFM to the FSAI (referred to in SOP for Hygiene Official Controls (latest issue 15/02/2016))		
13	4.2 and Annex II	The non-compliances identified in 19 of the 24 labels examined should be closed out by the inspectorate in conjunction with the food business operators.	All food business operators will be notified of the non-compliances. All non-compliances will be closed out with food business operators.	August 2014 October 2014	Complete All non-compliances are closed out. DAFM did follow up.		Closed Q4 2014 Closed 19/11/2015

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14	4.2 and Annex I	The non-compliances identified as part of the on-site verification activity, e.g. no procedures based on HACCP should be closed out by the inspectorate in conjunction with the food business operators.	<p>Three of the seven food business operators have already received official notices and the non-compliances have been closed out.</p> <p>The remaining food business operators will receive official notices.</p> <p>All non-compliances will be closed out.</p>	<p>Completed</p> <p>August 2014</p> <p>October 2014</p>			Closed Q4 2014



Abbey Court,
Lower Abbey Street,
Dublin 1.

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