



Údarás Sábháilteachta Bia na hÉireann  
Food Safety Authority of Ireland

# AUDIT REPORT

Audit of Ambient Storage  
and Distribution Food  
Business Operations.

October 2025



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# 1 Glossary

DAFM	Department of Agriculture, Food and the Marine
DCCD	Dairy Controls and Certification Division
NEHS	National Environmental Health Service
FBO	Food business operator
FIFO	First In, First Out
GFSI	Global Food Safety Initiative
FSAI	Food Safety Authority of Ireland
HACCP	Hazard Analysis Critical Control Points
HSE	Health Service Executive
SKU	Stock Keeping Unit
WMS	Warehouse Management System

## 2 Executive summary

The Food Safety Authority of Ireland (FSAI) is responsible for the enforcement of food law in Ireland. This is carried out through service contracts with official agencies. The FSAI carries out targeted audits of food businesses to verify compliance with food law and the effectiveness of its implementation. These audits are carried out in addition to official controls performed by official agencies and help deliver the FSAI's vision of safe and trustworthy food for everyone.

The FSAI completed an audit of ambient storage and distribution food business operators (FBOs) to evaluate FBO compliance with general requirements of food law. The audit focused on several key areas such as labelling, traceability, storage conditions, product handling activities etc. and set out to verify that food safety management systems in place including prerequisite programmes were fit for purpose within the food businesses audited.

The audit project included 24 on-site audits of individual food business establishments. Overall, there was a variable level of FBO compliance with the general requirements of food law evaluated during the audits. Serious non-compliances with these requirements were confined to a small number of food businesses audited. However, some of the non-compliances noted during the audit series undermined the safety of the foods being placed on the market following storage in those premises and also resulted in food products being placed on the market which were not accompanied by all required mandatory food information in the English language.

A total of 77 non-compliances with food law were identified during the audit programme. Non-compliances with food law were detected within 16 (66%) of the 24 food businesses audited. Within six of these food businesses the non-compliances were found to be serious, as significant concerns were raised regarding issues such as the evidence of rodent activity, the adequacy of pest prevention and control measures, the standard of housekeeping and hygiene, the adequacy of labelling and the condition of site and building standards.

Pest control featured as the most prominent area for non-compliance throughout the audit programme. Non-compliances associated with pest control were identified within 14 (58%) out of the 24 food businesses audited. Almost 30% of all non-compliances raised were linked to the area of pest control, with rodent droppings being identified within one-third (33%) of all food businesses inspected during this audit project. Traceability exercises were completed in 19 out of the 24 FBOs audited. In total there were 59 traceability exercises completed. 45 (76%) of the traceability exercises completed were satisfactory and 14 (24%) were found to be unsatisfactory. In all cases,

any non-compliance identified was referred to the relevant supervising agency for follow-up on the day of the audit.

Based on audit findings from 5 out of the 24 audits completed, the FSAI audit team considered that the non-compliances identified required further enforcement action and recommended that enforcement action be considered by the relevant official agency. Audit findings from one FBO audit, resulted in a fixed payment notice being issued by the FSAI for the failure to notify the official agency of an establishment under its control, with a view to registration. In summary, 10 recommendations are made to strengthen compliance with food law, while 1 recommendation suggests exploring opportunities to strengthen the effectiveness of official controls at detecting and responding to non-compliance with food law.

## 3 Introduction

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 official agencies. The FSAI carries out targeted audits of food businesses to verify compliance with food law. These audits are carried out in addition to official controls by official agencies and help deliver the FSAI's vision of safe and trustworthy food for everyone. The official agencies responsible for supervising establishments within the scope of this audit project are:

- The National Environmental Health Service (NEHS) of the Health Service Executive (HSE)
- The Dairy Controls and Certification Division (DCCD) of the Department of Agriculture, Food and the Marine (DAFM).

This targeted audit of ambient storage and distribution food business operations was undertaken as part of the FSAI's 2023 planned programme of audits.

### 3.1 Audit objective

The objectives of the audit were to:

- Assess food business operator (FBO) compliance with food legislation applicable to their business, with a particular emphasis on labelling, traceability, and storage conditions.
- Verify that any products no longer fit for human consumption are being managed appropriately and in compliance with relevant food law.
- Verify that any additional product handling activities carried out are done so in compliance with relevant food law.
- Verify that the food safety management systems in place including prerequisite programmes are fit for purpose for the premises audited.

### 3.2 Audit scope

The audit focused on an assessment of FBO controls and arrangements for compliance with food legislation applicable to their business, with a particular emphasis on labelling, traceability, and storage conditions. The scope of the audit also included an assessment of any additional product handling activities carried out and of any product no longer fit for human consumption in line with relevant food law. While this audit was primarily an audit of FBO compliance with legislative requirements, it also verified whether official controls were being conducted where appropriate.

### 3.3 Audit criteria and reference documents

The principal audit criteria referred to during the audit were:

- **Legislation**
- **General food law and hygiene package:**
  - Regulation (EC) No 2017/625
  - Regulation (EC) No 178/2002
  - Regulation (EC) No 852/2004
  - Regulation (EC) No 853/2004
  - S.I. No. 22 of 2020
  - S.I. No. 79 of 2020
  - S.I. No. 747 of 2007
  - S.I. No. 369 of 2006
  - FSAI Act 1998
- **Provision of food information to consumers:**
  - Regulation (EU) No 1169/2011
  - S.I. No. 556 of 2014
- **Microbiological criteria:**
  - Regulation (EC) 2073/2005
  - S.I. No. 474 of 2012
- **Guidance**
  - *Guidance Note No. 10: Product Recall and Traceability*
  - *Guidance Note No. 11: Assessment of HACCP Compliance*
  - *Guidance Note 18: Validation of Product Shelf-life (Revision 4)*
  - *Guidance Note No. 28: Food Allergen Information for Non-Prepacked Foods in Ireland.*

### 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 Audit Charter. These procedures implement the FSAI's audit obligations as set out in Section 47 of the Food Safety Authority of Ireland Act 1998, as amended.

The audit team selected a list of 24 FBOs of varying size, scale, and complexity to be included within the audit project. The list of FBOs selected included a range of food business types, such as

distributors, distribution centres, cross docking facilities, cash and carry's, third party warehousing, private warehousing and operators utilising self-storage units.

The audit comprised of 24 unannounced<sup>1</sup> on-site audits of individual food business establishments. Table 1 summarises the number of each food business type audited.

**Table 1: Food business type**

No.	Food business type	Quantity audited	Supervising agency
1	Third party warehousing <sup>2</sup>	6	HSE x 2 DCCD x 4
2	Private warehousing <sup>3</sup>	5	HSE
3	Large scale distribution centre <sup>4</sup>	4	HSE
4	Cash and carry <sup>5</sup>	3	HSE
5	Distributor <sup>6</sup>	3	HSE
6	Ethnic food and drink distributor <sup>7</sup>	2	HSE
7	Dedicated cross docking facility <sup>8</sup>	1	HSE

<sup>1</sup> The official agency was notified in advance of each audit so that the relevant official agency personnel could accompany the audit team. Two FBOs were provided with prior notice of the audit, due to known limited operational hours associated with same.

<sup>2</sup> Third-party warehousing refers to the outsourcing of warehousing and possibly other activities such as logistics, inventory management, fulfilment etc. to a third-party business.

<sup>3</sup> Private warehousing refers to a warehouse or storage facility that is owned by a company rather than a third-party provider.

<sup>4</sup> Large scale distribution centre refers an all-in-one logistics operation that store, pick, pack and ship products to fulfil orders to retail locations on a grand scale.

<sup>5</sup> Cash & Carry refers to a wholesale store where businesses and other customers can pay cash for goods at low prices and take them away instead of having them delivered.

<sup>6</sup> Distributor refers to a business who purchases products to sell to retailers or other companies rather than to consumers.

<sup>7</sup> Ethnic Food and Drink Distributor refers to a company who specialises in the distribution of Ethnic food products.

<sup>8</sup> Cross docking refers to a method for distributing products more efficiently without needing to store them in warehouses for long periods of time. (In most cases products are unloaded from inbound vehicles, sorted and directly reloaded onto outbound vehicles)



At the opening meeting of each individual audit, the audit team outlined the planned scope of the audit and explained that any matters of evident concern outside the scope of the audit would also be considered should they arise.

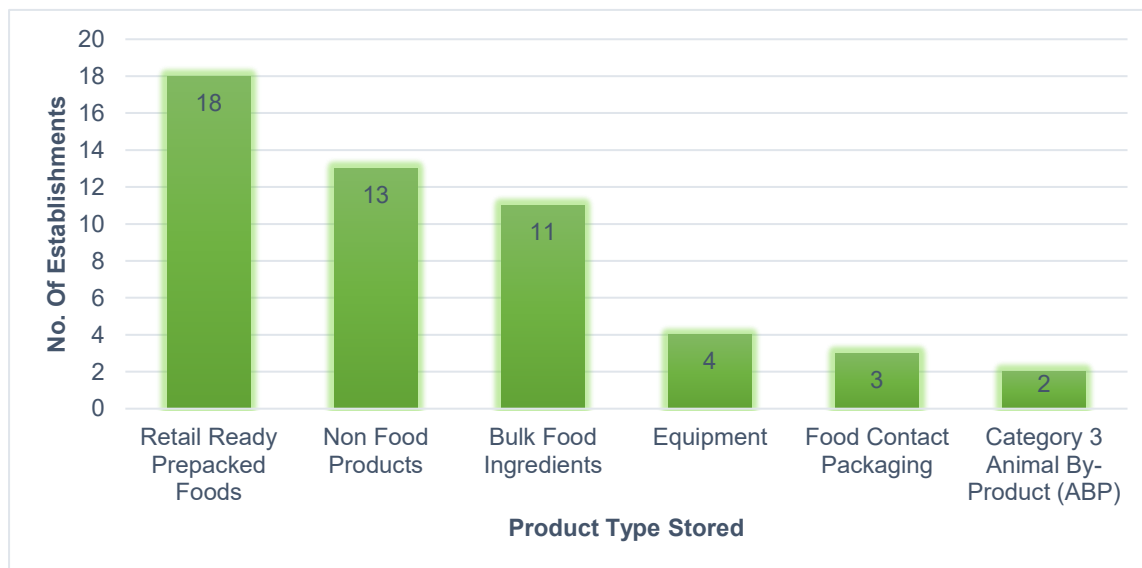
During each individual audit, operational controls, documented procedures, and records relating to the food safety management system were evaluated as appropriate. Food business operators were requested to carry out several verification exercises which included checks on traceability, products on hold, out of date product and the verification of stock on hand. During the audit project, approximately 59 traceability challenges were conducted.

Each FBO was provided with an individual report following the audit of their establishment and these reports were copied to the relevant supervising official agency to allow them to verify that any non-compliance(s) were closed out by the FBO. Environmental Health Officers (EHOs) from the NEHS and Dairy Produce Inspectors (DPIs) from the Dairy Controls and Certification Division (DCCD) accompanied the audit team during the audit of each establishment. In line with the FSAI audit procedure, it was agreed that where, during the audit, an issue is identified which has the potential to result in a serious threat or a grave and immediate danger to public health the responsibility for dealing with the matter lies with the official agency personnel accompanying the audit team.

## 4 Summary of audit findings

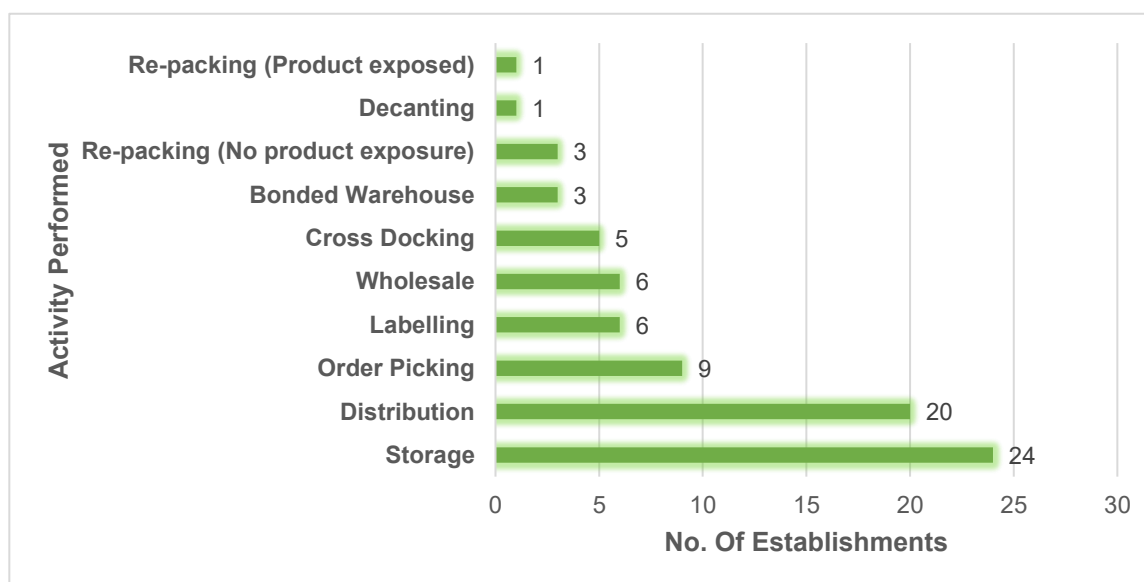
### 4.1 Products stored and activities performed

The majority of food businesses audited held a large variety of ambient “retail ready” prepacked food products in storage, with some distribution centres having a range of up to 5,000 product SKU’s (stock keeping units). Figure 1 provides an overview of the product types being stored within the 24 food businesses audited.



**Figure 1: Product type stored**

Ambient food products were being stored in all food businesses audited, however, in addition to ambient food storage, the majority of food businesses also performed and / or offered an array of other activities. The below graph provides an overview of the various activities performed by the food businesses audited.

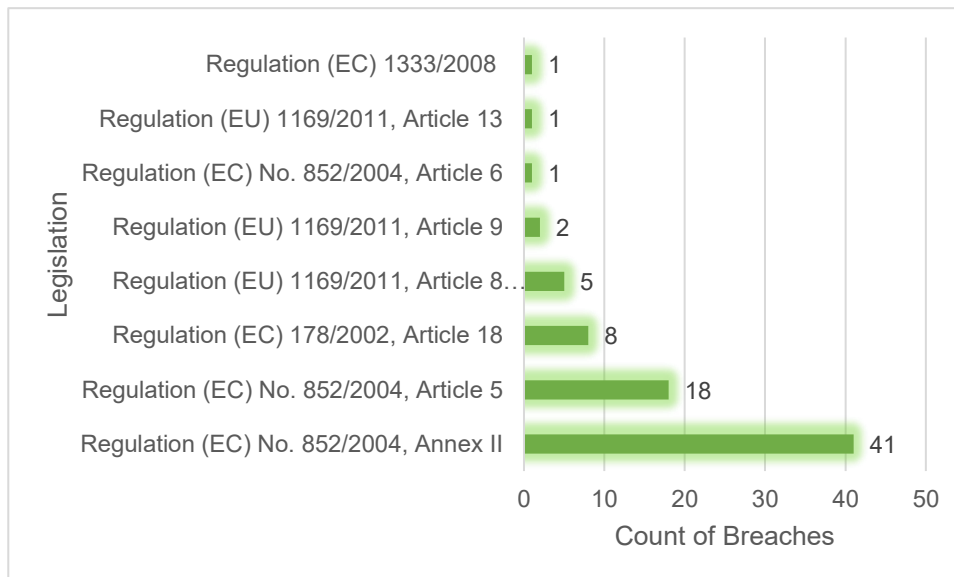


**Figure 2: Activities performed**

## 4.2 Non-compliance with food law

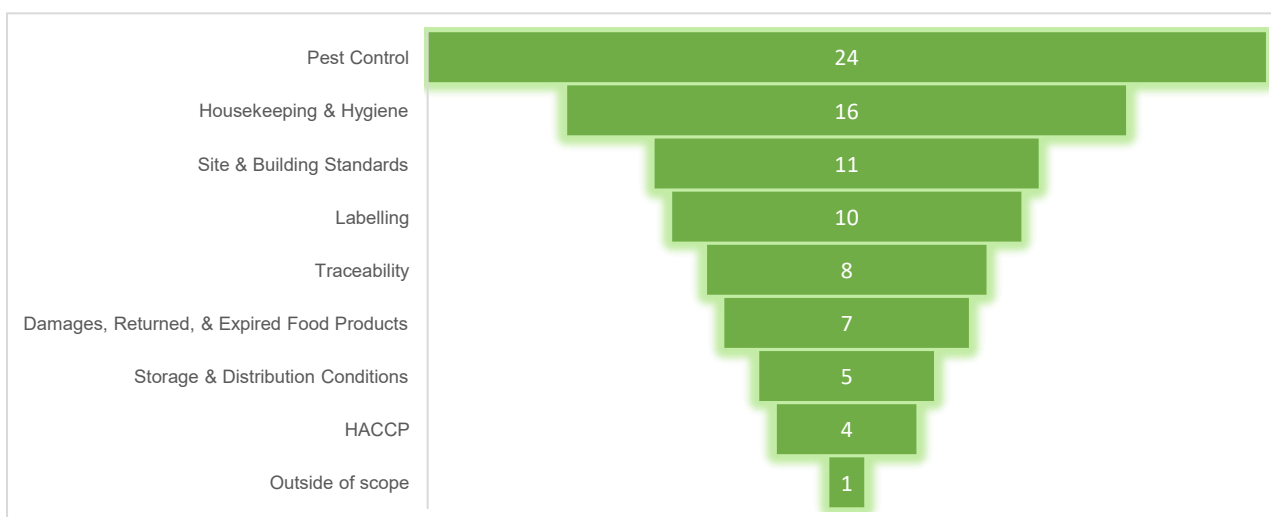
Non-compliance with food law was detected in 16 (66%) out of 24 establishments audited. In six establishments the non-compliances were considered serious. A total of 77 non-compliances with

food law were raised during this audit project. Figure 3 provides an overview of the principal legislation breached in each case.



**Figure 3: Legislative non-compliances**

Figure 4 provides an overview of the main areas/sections linked to the non-compliances identified. It is important to note that a single non-compliance may relate to multiple areas/sections assessed e.g. pest control and building standards.



**Figure 4: Area/section assessed linked to non-compliance**

Eight out of twenty-four (one out of three) food businesses audited held third party certification to a Global Food Safety Initiative (GFSI) food safety standard, with a grade of A or higher. Despite this,

these food businesses combined, accounted for over 42% of all non-compliances with food law identified during this programme of audits.

### 4.3 Registration of establishments

The audit team verified that all but one of the FBOs audited were registered with the relevant official agency under Regulation (EC) 852/2004. During the course of the audit project, and in addition to the 24 food businesses audited, the audit team identified several establishments which were not registered with the relevant official agency.

Two out of the twenty-four food businesses audited, were found to be falling under the supervision of both the NEHS and the DCCD. The criteria and guidance for determining the supervising agency for these two food businesses was reviewed by the NEHS, DCCD and the FSAI. The output of this review resulted in the removal of dual supervision and the allocation of supervision to one official agency in each case.

### 4.4 Formal enforcement action

In line with the FSAI audit procedure, where, during the audit, an issue is identified which has the potential to result in a serious threat or a grave and immediate danger to public health, responsibility for dealing with the matter lies with the official agency personnel accompanying the audit team. Based on audit findings from 5 out of the 24 audits completed, the FSAI audit team considered that the non-compliances identified required further enforcement action by the official agency and recommended that enforcement action be considered by the relevant official agency. In each case, no formal enforcement action was subsequently notified by the official agency concerned.

Audit findings from one FBO audit, resulted in a fixed payment notice being issued by the FSAI for the failure to notify the official agency of an establishment under its control, with a view to registration (as per legislative reference).

### 4.5 Storage and distribution conditions

Appropriate storage and distribution conditions are essential for the preservation of product safety, product integrity, and to ensure that consumers receive safe and satisfactory food products.

Ambient storage refers to the storage of food products at room temperature which is typically between 10 and 20°C. Ambient food products are typically considered shelf-stable foods and would include food products such as dried foods, rice, pasta, flour, sugar, spices, oils, and foods

processed in aseptic or retort packages and other products that do not require refrigeration until after opening. While it is not necessary to maintain such products at chilled or frozen temperatures, it is essential to ensure that all other appropriate conditions for the storage and distribution of ambient foods (such as adequate ambient temperatures, hygiene and housekeeping, storage infrastructure, pest controls, employee training etc.) are in place, managed and maintained.

The 24 food businesses audited, varied greatly in relation to size, scale, and complexity. Of these food businesses, 3 FBOs had a storage capacity of greater than 20,000 pallet spaces, 12 FBOs had a storage capacity in a range between 5,000 and 14,000 pallet spaces, 5 FBOs had a storage capacity in a range between 100 and 900 pallet spaces and 4 FBOs had a storage capacity in a range between 4 and 20 pallet spaces. The majority of FBOs received food products through covered intake bays, which provides a level of protection from the external environment, however, several FBOs also received food products through roller doors. The audit team noted that all but one of the food businesses had a detailed electronic warehouse management system (WMS<sup>9</sup>) in place. For the most part, food products were found to be stored on pallets in identifiable designated locations either on pallet racking or free-standing. Pallet stacking was noted in some stores that were holding bulk dairy powders.

Nine out of the twenty-four food businesses performed order picking<sup>10</sup> and all food businesses stated that they operate a first in, first out (FIFO) inventory method, unless otherwise directed by their clients. Three FBOs performed a re-packing activity, whereby the damaged or compromised outer packaging of a product is removed, and the affected product is re-packed into a cardboard box or shrink wrapped. One FBO carried out a re-packing operation whereby bulk raw materials are opened, decanted and re-packed into smaller packs for onward sale.

Regulation (EC) No. 852/2004 on the hygiene of foodstuffs requires that FBOs store raw materials and all ingredients “in appropriate conditions designed to prevent harmful deterioration and protect them from contamination”. On four separate occasions the audit team noted that food products were being stored outside of the warehouse for periods of time before being receipted into the warehouse or before being dispatched. On one such occasion the audit team identified several

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<sup>9</sup> A warehouse management system is a software application that records and manages the movement and storage of materials within a warehouse. This can include goods receiving, goods dispatch, order picking and allocation.

<sup>10</sup> Order picking: picking and assembling individual components into orders for a client / customer.

damaged cases of food products outside of the warehouse which were pending assessment by the FBO. It was explained by the FBO that such products could remain in this partially enclosed area for several days before being transferred into the building. Within the same establishment, the audit team also noted that some food products were being stored directly on the ground. It is important to ensure that food is protected against any contamination likely to render the food unfit for human consumption, injurious to health or contaminated in such a way that it would be unreasonable to expect it to be consumed in that state.

Within four FBOs, it was noted that the storage area for damaged products and products pending assessment was not satisfactory. In some cases, products were noted being stored directly on the ground, damaged products were being stacked on top of each other and products could be seen leaking and spilling on to the ground. In one food business, several pallets of food products were sitting in pools of water which was emanating from decommissioned freezers. It was evident that the wooden pallets in question were starting to absorb this water from the ground. In 9 out of the 24 FBOs audited, the audit team found that issues pertaining to the building structure, hygiene, and pest control were impacting on the suitability of the storage conditions to varying extents.

Several haulage trailers and transport vehicles were inspected during the audit project. In general, the condition of the haulage trailers and transport vehicles inspected were found to be to a good standard. The audit team did note that there were instances where the process for accepting or rejecting a trailer and the acceptability criteria for same, was not documented as part of the food safety management system.

### 4.6 Traceability

Regulation (EC) No 178/2002 sets out the basic principles of food law to protect human health and consumer interests. It applies to all stages of production, processing and distribution of food and feed. Article 18 of Regulation (EC) No 178/2002 requires that “The traceability of food, feed, food-producing animals, and any other substance intended to be, or expected to be, incorporated into a food or feed shall be established at all stages of production, processing and distribution” and “To this end, such operators shall have in place systems and procedures which allow for this information to be made available to the competent authorities on demand”.

All FBOs audited used their warehouse management system (WMS) or a combination of their WMS and paper files to demonstrate traceability. Traceability exercises were completed in 19 out of the 24 FBOs audited. In total there were 59 traceability exercises completed; 45 (76%) of the

traceability exercises completed were satisfactory and 14 (24%) were found to be unsatisfactory.

Unsatisfactory traceability exercises resulted from one or a combination of the below issues:

- The products selected for traceability could not be identified on the WMS or on paper records.
- The products selected for traceability could not be traced backward through the WMS or paper records.
- The products selected for traceability were showing on the stock management system as having been consumed/dispatched.
- The FBO was unable to determine where selected stock went (i.e. one step forward) at the time of the audit.
- The FBO was unable to determine where selected stock originated from (i.e. one step backward) at the time of the audit.
- Certain information concerning the consignment being traced was not available upon request at the time of the audit.
- Inadequate or insufficient traceability details were present on the day of the audit.

In 23 of the 24 establishments, a traceability procedure was provided to the audit team upon request during each audit. In general, the audit team found that the traceability procedures provided were robust and demonstrated how traceability links backwards and forwards are intended to be maintained.

Three out of the four FBOs carrying out a re-packing operation were found to have deficiencies regarding elements of traceability. One FBO, despite having a detailed traceability procedure in place, was not following its own internal process for maintaining traceability while generating a new case of mixed products. One FBO could not demonstrate the movements of certain stock through their repacking facility and in line with their internal traceability procedure. One of the FBOs (whose re-packing operation involves the opening, decanting, and re-packing of bulk materials into smaller packs for onward sale) had multiple issues regarding the accuracy of traceability information and the ability to demonstrate backward traceability, for example:

- Two products selected and traced back from bulk storage were not present on the stock management system at the time of the audit.
- Two batches of product within the re-packing area were selected to be traced back to stock on hand. Despite being physically present on site, the stock control system indicated that these batches had been consumed and that different batches were currently being used to fulfil orders.

- There were no documented records in place regarding the re-packing of bulk ingredients into smaller quantities for the final consumer. As such, there was no confirmation that the stock/batch being allocated to an order from the online stock management system was in fact the stock/batch being used.
- Internal traceability was not being maintained for several decanted products inspected within the re-packing room, as per the FBOs procedure. As a result, it was difficult for the FBO to maintain a definite link backward to bulk product and forward to finished product.
- The internal traceability displayed on several decanted ingredient containers was not accurate or reflective of the product contained within.

During the audit of one FBO, the audit team noted that there were deficiencies regarding the traceability of returned products. In this instance, there was no record being maintained to detail that returned damaged stock had been received back into the business, and there was no record being maintained regarding the disposal of same.

### 4.7 Labelling

Regulation (EU) No. 1169/2011 sets out the general principles and obligations regarding the provision of food information. In Ireland, food information must be provided in English. Other languages, including Irish, may be provided in addition. Food information must be accurate, clear, easy to understand, and it must not be misleading to the consumer.

A review of product labels was carried out within each FBO audited. To the extent assessed, products inspected within 19 (79%) of the FBOs audited were found to be labelled in compliance with legal requirements and labels were complete and accurate. Deficiencies in product labelling were found in 5 (21%) of the FBOs audited. Table 2 provides an overview of the deficiencies encountered.

Table 2: Labelling deficiencies

FBO		Food Business Type	Labelling Deficiencies
FBO 1	Ethnic food and drink distributor		<ul style="list-style-type: none"><li>• Several food products staged for dispatch were not accompanied by mandatory food information in the English language.</li><li>• Several food products returned from the FBOs stores were not accompanied by mandatory food information in the English language.</li></ul>



		<ul style="list-style-type: none"> <li>Several supplementary labels inspected did not contain all the mandatory food information in the English language and or in the correct manner i.e. the designation of certain ingredients by the name of a category rather than a specific name, ensuring allergenic substances are emphasised through a typeset that clearly distinguishes it from the rest of the list of ingredients, for example by means of the font, style, or background colour etc.</li> <li>Prior to the audit, several products were purchased by a member of the audit team from one of the FBOs stores. These products were not accompanied by mandatory food information in the English language and were brought to the attention of company representatives during the audit.</li> <li>There were no procedures in place as part of the food safety management system to ensure the appropriateness, completeness, and accuracy of labelling, and that all products placed on the market are accompanied by accurate mandatory food information in the English language.</li> </ul>
FBO 2	Ethnic food and drink distributor	<ul style="list-style-type: none"> <li>Several food products staged for dispatch were not accompanied by mandatory food information in the English language.</li> <li>Several supplementary labels inspected did not contain all the mandatory food information in the English language and/or in the correct manner i.e., ensuring allergenic substances are emphasised through a typeset that clearly distinguishes it from the rest of the list of ingredients, for example by means of the font, style, or background colour etc.</li> <li>Several supplementary labels inspected did not ensure clear legibility of all the mandatory particulars listed in Article 9 (1) of Regulation (EU) No. 1169/2011</li> <li>Prior to the audit, several products were purchased by a member of the audit team from one of the FBO stores. These products were not accompanied by mandatory food information in the English language and were brought to the attention of company representatives during the audit.</li> <li>There were no procedures in place as part of the food safety management system to ensure the appropriateness, completeness, and accuracy of labelling and that all products placed on the market are accompanied by accurate mandatory food information in the English language.</li> </ul>
FBO 3	Private Warehouse	<ul style="list-style-type: none"> <li>One retail ready product which is contract packed by the FBO did not have the address of the FBO on the label.</li> <li>Two retail ready products inspected were not labelled with all the mandatory food information in the English language.</li> <li>One bulk product did not have all the required labelling information present either on the inner or outer packaging or on accompanying paperwork.</li> <li>It was noted that a bulk product with a BBD of 01/11/2022 had been last re-packed and distributed to a customer on the 08/06/2023. This re-packed product was labelled with an additional 6-month shelf-life from the date of packing, however, there was no justification or supporting documentation for the extension of shelf-life available at the time of the audit.</li> </ul>

		<ul style="list-style-type: none"> <li>There were no procedures in place as part of the food safety management system to ensure the appropriateness, completeness, and accuracy of labelling and that all products placed on the market are accompanied by accurate mandatory food information in the English language.</li> </ul>
FBO 4	Distributor	<ul style="list-style-type: none"> <li>18 out of 22 cases of gold foiled Milk Chocolate bars had no labelling present on the foil or outer cases at the time of the audit.</li> <li>Packs of “Cheetos” inspected on the day of the audit contained an additive (Sunset Yellow - E110) which is not permitted in the food category: ready-to-eat savouries and snacks, as per the European union rules on labelling and food additives.</li> </ul>
FBO 5	Third Party Warehousing	<ul style="list-style-type: none"> <li>Several 25kg bags of milk powder in the Category 3 storage area were not labelled or did not have ink jetting present on the bags.</li> </ul>

It was the audit team’s conclusion that FBO 1 and FBO 2 did not have appropriate and effective systems and procedures in place to ensure that products are labelled in compliance with legal requirements, and in particular, to ensure that all products placed on the market are accompanied by mandatory food information in the English language. Due to the above-mentioned issues and taking into consideration the size, scale, and distribution reach of these two FBOs, it was recommended by the audit team that enforcement action under S.I. No. 556/2014 - European Union (Provision of Food Information to Consumers) Regulations 2014 be considered by the official agency.

## 4.8 Damaged, returned, and expired food products

Regulation (EC) No 852/2004 on the hygiene of foodstuffs, Article 5 requires that FBOs shall put in place, implement, and maintain, a permanent procedure or procedures based on the HACCP (Hazard Analysis Critical Control Points) principles. To this end, FBOs managing damaged, returned, or expired food products shall have systems and procedures in place for the management of same in line with their food safety management system. Furthermore, Annex II of Regulation (EC) No 852/2004 on the hygiene of foodstuffs requires FBOs to ensure “that all raw materials and all ingredients stored in a food business are to be kept in appropriate conditions designed to prevent harmful deterioration and protect them from contamination. At all stages of production, processing and distribution, food is to be protected against any contamination likely to render the food unfit for human consumption, injurious to health or contaminated in such a way that it would be unreasonable to expect it to be consumed in that state.”

A detailed review of damaged, returned, and expired food products was carried out in each of the food businesses audited. The majority of food businesses assessed, had documented procedures and controls in place relating to the management of damaged, returned, and expired food products. Several of these food businesses were found to have comprehensive and robust systems in place for managing such products. Systems included clear labelling of the physical stock, features to hold and block affected stock from being allocated or picked, and the use of designated storage or quarantine areas. Despite the above, deficiencies in the management of such products were found in 7 (29%) of the FBOs assessed. The following deficiencies were identified:

- Within three FBOs audited, it was noted that there was no procedure available on the day of the audit for the management of damaged, returned, and expired food products.
- Within three FBOs audited, it was noted that the dedicated returns/damages area was in a poor state of hygiene, with product leaking and spilling on the ground. Within one of these FBOs, it was noted that the dedicated area was not of sufficient size to manage the quantity of damaged, returned, and expired food products.
- Within two FBOs audited, it was noted that the process for determining the acceptability/unacceptability of damaged and expired food products was not fully documented in line with the food safety management system.
- Within two FBOs audited, it was noted that the documented procedure for the management of damaged and non-conforming products was not being followed in full.
- Within one FBO audited, the audit team observed a significant amount of damaged product and several out-of-date products in the assortment which was available for picking/sale at the time of inspection.
- Within one FBO audited, the audit team noted there was no consideration for the potential food safety hazards associated with damaged food products, which were being collected directly from the ground (behind pallets/pallet racking, in areas affected by leaking water and rodent activity) and re-packed for further sale. All affected damaged products in this area were voluntarily disposed of by the FBO subsequent to the audit.

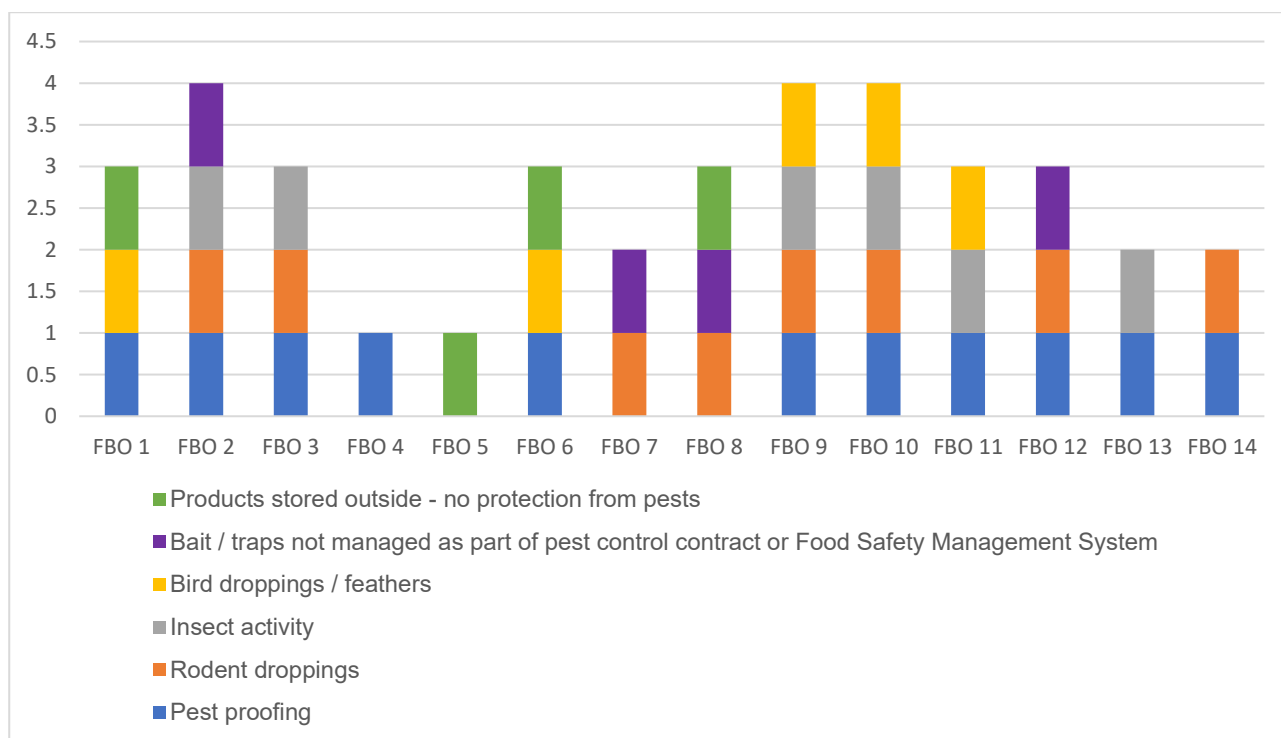
### 4.9 Pest control

Pest control plays a crucial role in maintaining the safety and integrity of food products during storage and distribution. Storage and distribution facilities, like any other food business, may be susceptible to infestation by pests such as rodents, insects, and birds. These pests can have the

potential to contaminate food with their droppings, urine, and hair, leading to the spread of diseases and foodborne illness.

Annex II of Regulation (EC) No 852/2004 on the hygiene of foodstuffs, requires FBOs to ensure that “the layout, design, construction, siting, and size of food premises permits protection against contamination and, in particular, pest control”. It also requires food businesses to ensure that “all ingredients stored in a food business are to be kept in appropriate conditions designed to prevent harmful deterioration and protect them from contamination” and that the food business has “adequate procedures in place to control pests”.

Each FBO had a pest control programme in place which was being implemented as part of its food safety management system. Despite this, pest control featured as the most prominent area of non-compliance throughout the audit programme. Non-compliances associated with pest control were identified within 14 (58%) out of the 24 food businesses audited. Almost 30% of all non-compliances raised were linked to the area of pest control. Non-compliances identified ranged in nature from minor pest proofing issues to more serious issues concerning the evidence of rodents and rodent activity present within food storage areas. Figure 5 provides an overview of the pest control issues identified, relative to each of the 14 FBOs where non-compliances associated with pest control were detected.



**Figure 5: Pest control deficiencies**

Rodent droppings were identified within one-third (eight) of all food businesses inspected during this audit programme. On several occasions the age of the rodent droppings identified was queried, as it was the opinion of the audit team and the supervising agency that some of the rodent droppings identified were not fresh/recent. This however, raised further concerns regarding the appropriateness and effectiveness of not only the food businesses cleaning procedures, but that of the contracted pest control services to identify and report on such issues. Within five out of these eight food businesses, significant concerns were raised by the audit team regarding the evidence of rodent activity and the adequacy of pest prevention and control measures. Table 3 provides an overview of the pest control related issues and findings, relative to the five aforementioned FBOs in question.

**Table 3: Pest control deficiencies**

FBO	Food Business Type	Pest control related deficiencies
FBO 1	Ethnic food and drink distributor	<ul style="list-style-type: none"> <li>Evidence of pest activity (rodent droppings) was noted in several areas of the ambient food store.</li> <li>Significant pest proofing issues were noted throughout the building which provided numerous potential pest ingress points, for example: <ul style="list-style-type: none"> <li>Several gaps at the base of the wall cladding and floor.</li> <li>Gaps between the roller bay doors and the dock leavers.</li> <li>Gaps around either side of the dock leavers. Gaps around the frame of the external double doors.</li> <li>Gaps around emergency exit doors.</li> <li>External doors and roller doors were open for the duration of the audit.</li> <li>Cracks in the wall floor junction areas.</li> <li>Two uncapped and open pipes/drains.</li> <li>Uncovered pipe bringing cables into the building.</li> <li>Uncovered vent in the wall cladding.</li> </ul> </li> <li>Several bait boxes were inaccessible on the day of the audit.</li> <li>A low level of crawling insect activity was also noted at the wall floor junction areas.</li> </ul>
FBO 2	Ethnic food and drink distributor	<ul style="list-style-type: none"> <li>Evidence of pest activity (rodent droppings) was noted in several areas of the ambient food store.</li> <li>A decomposed rodent carcass (mouse) was noted behind pallet racking where food was stored.</li> <li>Significant pest proofing issues were noted throughout the building which provided numerous potential pest ingress points, for example:</li> </ul>

		<ul style="list-style-type: none"> <li>○ Sections of the wall cladding along the back of the warehouse were not affixed or connected to the floor area. As a result, there was approx. a 1–2cm gap between the wall cladding and the warehouse.</li> <li>○ Several holes were noted in the metal housing of the waste compactor, which leads to the external area.</li> <li>○ Gaps between the roller bay door frames and the wall cladding at roof level.</li> <li>○ An uncovered/open drainpipe was identified within the warehouse.</li> <li>○ Prefabricated circular holes were noted in all the structural steel girders inspected at the loading bays and along the wall floor junction areas.</li> <li>○ Multiple cracks and gaps in the concrete at the wall floor junction areas along the internal boundary walls.</li> <li>○ There was a hole in the roof where an internal downpipe had been removed. As a result, a bucket had been placed beneath this hole to catch water.</li> <li>○ Vegetation which is overgrown around the external perimeter of the building was noted to have broken through the internal wall cladding and the emergency exit doors. As a result, this vegetation was now growing internally within the warehouse.</li> </ul> <ul style="list-style-type: none"> <li>• The storage of large quantities of old and redundant equipment along the internal boundary walls of the warehouse, was not only preventing access for cleaning, but was providing ample harbourage for pests.</li> <li>• All along the external walls of the warehouse was overgrown with vegetation and was providing ample harbourage for pests.</li> <li>• Evidence of insect activity was noted in multiple areas of the warehouse along the internal boundary walls.</li> </ul>
FBO 3	Large scale distribution centre	<ul style="list-style-type: none"> <li>• Evidence of pest activity (rodent droppings) was noted in several areas of the ambient food store.</li> <li>• One of the food businesses RADAR mouse traps<sup>11</sup> was activated by a mouse at the time of the inspection.</li> <li>• Multiple rodent bait boxes/RADAR traps were found to be loose, damaged, and open during the audit.</li> <li>• Pest control reports detailed a history of rodent activity spanning an 8-month period prior to the audit.</li> <li>• The food business operates a process whereby all products which have fallen off pallets and behind pallet racking etc. are collected, assessed and were possible re-packed and sold. However, there was no consideration for the potential food safety hazards associated with food products which were being collected from the ground in a warehouse with historical and ongoing internal rodent activity. (As a result, all product collected from the ground on the day of the audit was voluntarily disposed of by the FBO).</li> <li>• Flying insect activity was noted in certain areas of the warehouse, where flies could be seen on the outer packaging of products. Flying insect glue boards were found to be full in certain areas indicating high activity. Subsequent to the audit, contracted pest control services confirmed that there is a requirement for</li> </ul>

<sup>11</sup> RADAR mouse trap: Upon activation, each end of the trap closes, and carbon dioxide gas is released as a humane method of control. A warning light illuminates to indicate capture, informing you of mice activity.

		additional fly units to be installed and for the frequency of glue board changes and general cleaning to be increased.
FBO 4	Cash and carry	<ul style="list-style-type: none"> <li>Evidence of pest activity (rodent droppings) was noted in several areas of the ambient food store.</li> <li>Significant pest proofing issues were noted throughout the building which provided numerous potential pest ingress points, for example: <ul style="list-style-type: none"> <li>Several large roller doors remain open for the majority of the time the facility is in operation. Thus, allowing continuous access for potential pest ingress.</li> <li>Holes in the wall, unsealed external pipe hole, gaps between roller doors and the ground etc. were noted.</li> </ul> </li> <li>Several bait boxes inspected were loose/not anchored into position and were inaccessible.</li> <li>The storage of large quantities of old equipment and miscellaneous items along the internal boundary walls of the warehouse, was not only preventing access for cleaning, but was providing ample harbourage for pests.</li> <li>Pest control reports detailed a history of internal and external rodent activity 5 months prior to the audit. The audit team could not identify any documented recommendations from the pest control provider regarding the prevention of rodent ingress, other than the introduction of toxic bait "for the prevention of further movement". Despite this, on several occasions the pest control provider has detailed on the pest control reports that there "is a risk to humans/building fabric or product if not resolved".</li> <li>Where rodent activity had been noted on the pest control reports, it could not be established which bait points and areas were affected within the building.</li> <li>The most recent pest control report (which took place 16 days prior to the FSAI audit) stated that there was no evidence of rodent activity. This would indicate that all of the rodent droppings observed during the audit occurred subsequent to the last pest control inspection or, that these rodent droppings were not identified during the last routine service inspection.</li> <li>Flying insects were evident within the warehouse and in particular around the pallets of sugar and flour.</li> <li>Several bird feathers could be seen within the warehouse and on top of stored food products.</li> </ul>
FBO 5	Distributor	<ul style="list-style-type: none"> <li>Evidence of pest activity (rodent droppings) was noted in several areas of the ambient food store.</li> <li>The storage unit was not sufficiently pest proofed to prevent pest ingress; gaps were noted in several areas of the warehouse around the door and roof area.</li> <li>Open poison bait blocks were noted around the internal perimeter walls of the storage area. The poison bait was put in place by the FBO; however, this is not managed in line with the food businesses pest control procedure and food safety management system.</li> </ul>



Given the nature and extent of the pest control related issues noted, the FSAI audit team recommended that enforcement action be considered by the relevant official agency for each of the above FBOs.

FBO 5, mentioned above, was operating out of an unregistered premises at the time of the audit and was in the process of moving to a more suitable premises. In this case, enforcement action was recommended by the audit team, should this FBO continue to operate out of the premises in question and fail to relocate to a more suitable premises with a view to registration. It was communicated to the audit team, that this FBO relocated and registered with the official agency subsequent to the audit. A fixed payment notice was subsequently issued by the FSAI to this FBO for the failure to notify the official agency of an establishment under its control with a view to registration.

There was evidence of bird activity (i.e. bird droppings and feathers) noted within 5 out of the 24 food businesses audited. For the most part, non-compliances identified were considered to be minor in nature, however, within 1 of the 5 food businesses audited, the level of bird activity was extensive. Birds were present within two separate sections of the warehouse and could be actively seen flying in and out of one part of the building. Evidence of bird nests and perching areas were clearly visible within one section of the building where waste and damaged products were stored. As a result, a large build-up of bird droppings could be seen in these areas also. Bird droppings, while mainly found within one particular area, could also be seen sporadically on the pallet racking and on the floor of the main warehouse and product storage areas. This was as a direct result of inadequate pest proofing around redundant loading bay doors, gaps in the wall cladding and from external roller doors being left open. Following a review of routine pest control reports, concerns were raised by the audit team regarding the lack of detail pertaining to the established bird activity and nesting evident. Concerns were also raised by the audit team regarding the absence of reporting by staff and the escalation of such pest related issues to senior management as is required by the food businesses pest control procedure.

As detailed in section 4.5 above, during four separate FBO audits, the audit team noted that food products were being stored outside of the warehouse for periods of time before being receipted into the warehouse or before being dispatched. As a result, this does not ensure that food products are adequately protected from exposure to pests. In one instance, it was explained by the FBO that food products could remain in an external area for several days before being transferred into



the building. In each instance, the FBO had acknowledged the risks associated with same and was taking steps to ensure food is protected from potential exposure to pests.

Within four FBOs audited, it was noted that additional pest control measures (rodent traps/toxic bait) had been put in place by the food businesses. This was in addition to the monitoring and reporting services being provided by their contracted pest control providers. On two occasions open trays of toxic bait were noted behind and between pallet racking where food product was being stored. Concerns were raised by the audit team regarding the potential contamination risk posed by open toxic bait in areas where food is stored. It was agreed by the FBOs that this would be removed. It was confirmed during the audits that in all cases the additional pest control measures put in place by the food businesses were not being managed in line with the food businesses pest control procedures and or indeed their food safety management system.

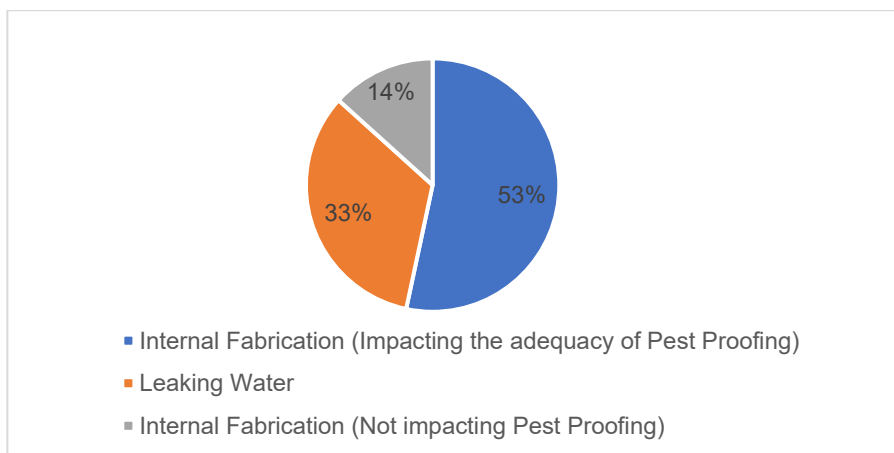
### 4.10 Site and building standards

Ensuring proper site and building standards for the storage of safe food is paramount for upholding food safety standards, preventing contamination and ensuring the quality and integrity of food products. Maintaining the building structure, a hygienic environment and facilitating optimal storage conditions are essential elements in promoting safe food storage practices.

The building structure and condition plays a critical role in safeguarding the quality and integrity of stored food products. It should provide protection from potential hazards to ensure that the safety, legality, and quality of food products are not compromised. Adequate ventilation, pest control measures and structural integrity help minimise the risk of contamination by pests and other environmental factors.

Annex II of Regulation (EC) No 853/2004 on the hygiene of foodstuffs requires FBOs to ensure that “Food premises are to be kept clean and maintained in good repair and condition”. It also requires that “The layout, design, construction, siting and size of food premises are to: (a) permit adequate maintenance, cleaning and/or disinfection, avoid or minimise air-borne contamination, and provide adequate working space to allow for the hygienic performance of all operations; (b) be such as to protect against the accumulation of dirt, contact with toxic materials, the shedding of particles into food and the formation of condensation or undesirable mould on surfaces; (c) permit good food hygiene practices, including protection against contamination and, in particular, pest control”.

Non-compliances associated with site and building standards were identified within 9 (37%) out of the 24 food businesses audited. Non-compliances ranged in nature from minor fabrication issues to more serious building integrity issues, allowing for the ingress of pests into food storage areas and water leaking from the roof on to food products. Figure 6 provides an overview of the main site and building standard issues noted across the 9 food businesses where non-compliance was identified.



**Figure 6: Site and building standard issues across nine FBOs**

Of site and building standard issues noted, 53% related to deficiencies in internal fabrication which directly impacted on the standard of pest proofing. These included issues such as damage to external walls, floors, roofs, and doors. Many of these issues are linked to the pest proofing issues highlighted in section 4.9 above. Within one particular FBO audited, serious concerns were raised by the audit team regarding site and building standards, and the risks posed to food products from contamination by pests and other environmental factors. This is laid out in detail in section 4.9, Table 3 under FBO 2.

Of site and building standard issues noted, 33% were linked to the leaking and pooling of water. Within two particular FBOs audited, there was evidence of extensive and on-going water leaking issues from the roof noted. This was directly impacting food products being stored in the areas below. Both FBOs had a certain quantity of water damaged food products which were on hold pending a review and assessment at the time of the audit. It was acknowledged by the audit team that both FBOs had taken measures to try and minimise the impact of the leaking water on food products in the areas affected. However, it was the opinion of the audit team, that the measures taken did not eliminate or reduce the risk to such an acceptable level to allow the continued

storage of food products in these affected areas. In both cases the FBOs were requested to expedite roof repairs and to remove products from any areas affected by leaking water.

Of site and building standard issues noted, 14% were linked to deficiencies in internal fabrication which did not impact on the standard of pest proofing. These included issues such as minor damage to internal walls and floors etc. While the above detail provides an overview of the more serious issues encountered during the audit, it is important to note that satisfactory site and building standards were being maintained within the majority of the FBOs audited. This included a mix of both relatively new and modern buildings, to several older and more aged buildings which were equally being well maintained.

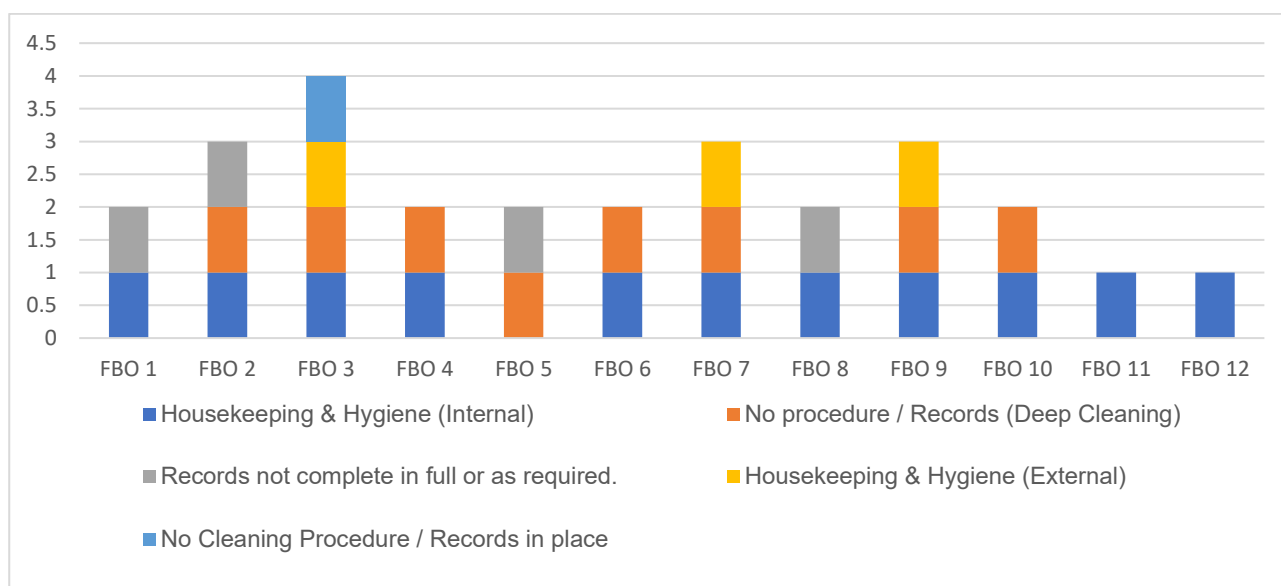
### 4.11 Housekeeping and hygiene

Appropriate and effective housekeeping should be in place to ensure that appropriate standards of hygiene are maintained and that the risk of contamination to food products is minimised. Regular cleaning of storage areas and equipment prevents the buildup of dirt, bacteria, and other potential contaminants. In conjunction with appropriate housekeeping and hygiene, the implementation of proper waste disposal practices prevents the accumulation of waste which can also lead to the attraction of pests and/or create unsanitary conditions.

Annex II of Regulation (EC) No 852/2004 on the hygiene of foodstuffs, requires FBOs to ensure that “Food premises are to be kept clean and maintained in good repair and condition”. Regulation (EC) No 852/2004 on the hygiene of foodstuffs Article 5 also requires that “food business operators shall put in place, implement and maintain a permanent procedure or procedures based on the HACCP principles”. These procedures describe how the FBO ensures that the premises is maintained in an appropriate condition for a food premises, and that all operations are carried out hygienically and in compliance with food law.

The audit team found that in 23 out of the 24 FBOs, there were documented cleaning procedures and records in place, which formed part of the food businesses pre-requisite programme in line with their food safety management system. It was noted that the cleaning programmes and procedures adopted by each of the food businesses varied somewhat in terms of how comprehensive, robust, and commensurate they were with the nature and activities of the food business.

Non-compliances associated with housekeeping and hygiene were identified within 12 (50%) out of the 24 food businesses audited. It was noted in almost all cases, that the main product aisles were found to be kept in a good state of cleanliness. However, the audit team did note that the vast majority of issues identified, related to areas behind pallet racking/pallets and around the internal perimeter walls of the storage areas. Figure 7 provides an overview of the main housekeeping and hygiene issues noted relative to the 12 FBOs.



**Figure 7: Housekeeping and hygiene deficiencies**

Issues pertaining to internal housekeeping and hygiene standards, consisted of product spills, leaking products, products which had fallen from pallets/pallet racking, a build-up of dust, dirt, debris, dead insects, bird droppings, rodent droppings etc. Issues pertaining to external housekeeping and hygiene standards, consisted of overgrown vegetation, unkept external grounds and a build-up of rubbish, redundant equipment, and miscellaneous items. An absence of cleaning procedures and records pertaining to deep cleaning<sup>12</sup> and the non-routine cleaning of areas such as behind pallets/pallet racking and hard to reach/high areas, was a common theme throughout the audit. Within four of the FBOs audited, the audit team found that the standard of housekeeping and hygiene was unsatisfactory and required attention to remedy same. Table 4 provides, and overview of the audit teams concerns within these four FBOs.

<sup>12</sup> Deep cleaning – a term that refers to more than just regular cleaning. For example, it could mean a more thorough and extensive cleaning of the storage area i.e. cleaning behind pallets and pallet racking etc.

**Table 4: Housekeeping and hygiene deficiencies**

FBO	Food Business Type	Housekeeping and hygiene related deficiencies
FBO 1	Ethnic food and drink distributor	<ul style="list-style-type: none"> <li>• Large amounts of miscellaneous material and equipment along the walls of the warehouse were blocking access for cleaning. As a result, there was an extensive build-up of dust, dirt, and webbing in these areas.</li> <li>• A build-up of dead insects, old rodent droppings and a rodent carcass was noted along the internal boundary walls. This suggested that routine cleaning was not taking place in these areas.</li> <li>• The external area of the warehouse was not being maintained to a sufficient standard, i.e. overgrown vegetation, and a build-up of waste materials such as food packaging, plastic, cardboard, and pallets were noted in many areas of the yard.</li> <li>• The audit team noted that there were no live documented cleaning procedure and records in place on the day of the audit.</li> </ul>
FBO 2	Cash and Carry	<ul style="list-style-type: none"> <li>• Numerous housekeeping issues were identified during the site inspection, (e.g. a build-up of dirt, debris, webbing, broken glass, and damaged food products were noted in several areas of the warehouse).</li> <li>• No deep cleaning was evident during the audit.</li> <li>• The business informed the audit team that there was no defined process in place for cleaning and the premises was cleaned “as required”.</li> <li>• The external area of the building was also in need of attention due to overgrown vegetation and a build-up of rubbish and redundant equipment.</li> </ul>
FBO 3	Large scale distribution centre	<ul style="list-style-type: none"> <li>• A significant amount of food product and debris was noted behind pallets and pallet racking.</li> <li>• Spillages and leaking products were noted in several areas of the warehouse.</li> <li>• Spillages were not being reported immediately and cleaned as required by the FBOs procedures.</li> <li>• A considerable amount of product debris was noted under the trolleys / trays and around cages/pallets of food in the salvage and re-packing area.</li> <li>• Heavy spider webbing was noted in certain corners/wall floor junction areas.</li> <li>• Rodent droppings were noted in several areas between some of the main aisles.</li> <li>• There were no cleaning records being completed for the product salvage and re-packing area at the time of the audit.</li> <li>• There was no evidence to suggest a deep clean had been carried out in the salvage and re-packing area or between certain aisles as required by FBO procedures.</li> <li>• There were no records of any deep cleaning completed at the time of the audit.</li> </ul>
FBO 4	Cash and Carry	<ul style="list-style-type: none"> <li>• A build-up of heavy cobwebs was noted in several areas high up on the internal wall and in areas behind pallet racking.</li> <li>• Product spillages were noted in several areas.</li> <li>• While there was a daily/weekly cleaning schedule in place, there was no evidence of any deep cleaning being completed i.e. behind pallets / pallet racking etc.</li> <li>• Rodent droppings were noted in several areas of the warehouse.</li> <li>• There was a build-up of material such as wood, boxes, trays, and miscellaneous items in various areas of the warehouse which were blocking access for cleaning.</li> </ul>

## 4.12 Matters of evident concern outside the scope of the audit

The scope of this audit series focused on an assessment of FBO controls and arrangements for compliance with food legislation relative to the storage and distribution of ambient food products. It was noted that many of the food businesses being audited, also performed an element of temperature-controlled storage and distribution. While this area was considered to be out of scope for the audit series, the audit team did review temperature-controlled storage areas on several occasions. This was to assess whether the matters of evident concern being raised in the ambient storage areas, were also occurring in the temperature-controlled storage areas.

In general, the temperature-controlled storage areas reviewed were found to be satisfactory. However, within one of the FBOs audited, approximately 55.5 kg of unidentifiable and unlabelled frozen meat was noted in the freezer. There were eight packs of frozen meat in unlabelled, sealed trays, while the majority of the frozen meat was being stored in non-food grade plastic shopping bags. There were no health marks visible on any of the meat and no accompanying paperwork. All this meat was voluntarily disposed of by the food business during the audit.

## 5 Positive practices observed

There were many examples of good practices observed throughout the audit project relevant to all the areas assessed. Many of the food businesses were able to demonstrate good oversight and control of stock through very well-developed WMS. In many cases the WMS managed all aspects of stock controls and provided safeguards in relation to the picking and selection of stock. This is very important in ensuring that certain food products, such as expired, damaged, and quarantined food products, are not selected for dispatch to the customer.

In total, 45 (76%) of the traceability exercises completed were found to be satisfactory and demonstrated links backward to suppliers, forwards to customer and links to stock on hand. In several cases the food businesses were able to demonstrate all elements of traceability electronically where all relevant documentation had been linked as part of the WMS and electronic traceability. It is also important to note that no non-compliances were identified in 8 out of the 24 FBOs audited.

In one food business who provided picking and cross docking services, it was noted that in addition to the product label, each case/pallet picked was labelled with a “pick label”. This pick label is used to facilitate internal traceability and to ensure full transparency on all stock

movements. Each pick label provides details such as the customer's name, pallet ID, route number etc. The audit team concluded that this was a very robust system that aided to assure traceability throughout the process.

Several of the food businesses audited were operating from relatively new and modern storage facilities. In each case the housekeeping and hygiene, pest proofing, building structure, layout and design was to a very high standard. However, the audit team did note that several of the older buildings assessed were also being maintained to an equally very high standard.

The audit team noted that on many occasions, good linkages had been established between the supervising inspectors and the food businesses, as it was clear that good communication and clarity of expectations and requirements had been established.

## 6 Conclusions

Overall, there was a variable level of FBO compliance with food legislation applicable to their business. Serious non-compliances with these requirements were confined to a small number of food businesses audited, however, some of the non-compliances noted during the audit series undermined the safety of the foods being stored and/or resulted in products placed on the market which were not accompanied by all required mandatory food information in the English language.

The audit findings indicate a need for the majority of FBOs to strengthen compliance with general requirements of food law across the areas assessed. The findings also indicate, that for a small number of the FBOs concerned, the controls adopted to safeguard food products (in particular pest controls, site and building standards, housekeeping and hygiene controls) and to ensure that the required mandatory food information is provided in the English language, were not appropriate and/or effective, and as such, required immediate attention.

Although this audit project did not specifically evaluate the effectiveness of official controls by official agencies, the audit findings suggest that official controls may require strengthening to optimise the detection of non-compliance and ensure that regulatory responses to non-compliance are sufficient for FBOs to remedy and prevent further occurrences of such non-compliance.

## 7 Recommendations

1. FBOs must notify the official agency of an establishment under its control with a view to registration.
2. FBOs must ensure that raw materials and all ingredients are stored in appropriate conditions designed to prevent harmful deterioration and protect them from contamination.
3. FBOs must ensure compliance with traceability requirements. FBOs should make use of available resources including the FSAI's *Guidance Note 10: Product Recall and Traceability*.
4. FBOs must ensure that there are appropriate procedures in place and that the food safety management system is commensurate with the nature and extent of the food business. This would include procedures for the management of traceability, housekeeping and hygiene, labelling, the process for determining the acceptability/unacceptability of damaged and expired products etc.
5. FBOs must ensure that food products are labelled with all the mandatory food information in the English language. Food information must be accurate, clear, easy to understand, and it must not be misleading to the consumer.
6. FBOs must ensure that the process for extending the shelf-life of a product which has exceeded its best before date, is fully documented and based on shelf-life studies in line with the food safety management system. FBOs should make use of available resources including the FSAI's *Guidance Note 18: Validation of Product Shelf-life*. Shelf-life validation studies must consider the relevant food safety hazards for the product identified in the FBO's HACCP-based food safety management procedures.
7. FBOs must ensure that all hazards are identified and controlled as part of FBO's HACCP-based food safety management procedures.
8. FBOs must ensure that the layout, design, construction, siting, and size of food premises permits protection against contamination and, in particular, pest control. FBOs must also ensure that there are adequate procedures in place to control pests. Appropriate mitigation



measures and corrective actions should be taken by food businesses to ensure that food products are protected from potential pest contamination.

9. FBOs must ensure that food premises are maintained in good repair and condition. The food premises must provide protection from potential hazards to ensure that the safety, legality, and quality of food products are not compromised.
10. FBOs must ensure that food premises are to be kept clean. FBOs must ensure ongoing compliance with general and specific hygiene requirements as part of an overall culture of food safety.
11. Official agencies should explore opportunities to strengthen official controls to optimise the detection of non-compliance and ensure that regulatory responses to non-compliance are sufficient for FBOs to remedy and prevent further occurrences of such non-compliance.



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