

AUDIT REPORT

Official Controls on Import
of Foods of Non-animal Origin
supervised by the Health
Service Executive

CORRECTIVE ACTION PLAN

SEPTEMBER 2012
(All corrective actions closed - December
2017)



CORRECTIVE ACTION PLAN

This Corrective Action Plan describes audit findings requiring corrective action, documents responsibility for addressing the findings, and describes progress on the closeout of actions.

Audit: Audit of Official Controls on Import of Products of Non-animal Origin supervised by the Health Service Executive

Official agency: Health Service Executive

Date of audit: 5-9 December 2011

Audit Tracker

Reference: 04-2011-IMP

CORRECTIVE ACTION PLAN

	To be completed by the FSAI		To be completed by the agency		To be completed by the agency and the FSAI through service contract liaison process		
	Report reference number	Finding requiring corrective action	Proposed corrective action	Proposed completion date	Update	Status	
						Open	Closed (include date closed out)
1	4.1.1, 4.4.5, 4.4.6, 4.4.8	<p>There are no documented procedures;</p> <p>(a) To identify how consignments for routine official controls are selected and</p> <p>(b) To deal with noncompliant consignments</p> <p>(c) To instruct staff regarding increased controls or emergency measures.</p>	<p>Dublin: While system exist a document procedure will be developed in relation to points A, B and C.</p> <p>Cork: In relation to (a)</p> <p>(1) all foodstuffs subject to emergency decisions are subjected to a control. This is possible due to the relatively small number of these importations.</p> <p>(2) all other imports a risk-based selection system will be documented.</p> <p>In relation to (b) a documented procedure will be drawn up. In relation to (c) regular updates are provided by the FSAI. A documented system for this will be set up.</p>	<p>Dublin: End June 2012</p> <p>Cork: End June 2012</p>	<p>Documented procedures completed in Dublin (October 2012).</p> <p>Documented procedures completed in Cork (June 2013).</p>		<p>October 2012</p> <p>June 2013</p>

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	4.1.1	Sampling is not carried out at Cork airport or port for any parameters, micro or chemical.	<p>Cork: In relation to routine official controls, Regulation 882/2004 states that official controls including sampling must be performed at an appropriate place. The Cork Port Health team notify the district EHO in the case of a food importation. It is commonplace that consignments through Cork port/airport are destined for a food business operator within the HSE South region, where there is prior knowledge of the food business operator, the premises and the space in which official controls can be carried out. Areas other than the port can be deemed an "appropriate place". No corrective action is required.</p>	N/A	HSE Port Health notify relevant local offices regarding sampling when new or unusual foods of non-animal origin are imported.		August 2014

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	4.2.2	The facilities for official controls at Dublin airport are not at the required standard for a DPE.	<p>Dublin:</p> <p>As detailed in Facilities at airport – Dublin access to improved facilities is being progressed in conjunction with FSAI and other agencies. This is constrained by the operation of the airport cargo handling.</p> <p>Feasibility study of dedicated inspection bay to be completed by November 2012.</p>	<p>Dublin:</p> <p>31 March 2017</p>	<p>The HSE Environmental Health Service is finalizing a proposal to rent and fit out space from Dublin Airport Authority.</p> <p>Update: Proposal accepted and funding process underway.</p>	Closed	

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	4.4.7	There are very few formal opportunities for the EHS at Dublin and Cork to coordinate how controls are being implemented to ensure a consistency of approach for the importation of goods into Ireland.	The terms of reference of the national port health group will be reviewed to consider whether it is the appropriate forum for the coordination, consistent implementation and information exchange on imports of food of non-animal origin.	October 2012	Terms of reference have been changed. Meeting of group held.		August 2014

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	4.4.2	The EHS will need to consider further the penalties for importers who do not comply with this prior notification.	Dublin: While legally the food business operator is required to provide the date in advance, consignees may not know the actual date of arrival until after the goods have landed and they are notified by their agent of this. The auditors noted that consignments were not released until official controls were carried out. Delay in release of good until after notification period is a sanction on the consignee and can have demurrage charges of €100 day in port. Enforcement actions must be proportionate; the relative cost of taking formal action is not generally justified in such cases	N/A			September 2012

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	4.4.4	Full cost recovery to cover additional official controls associated with imports are not in place.	<p>Dublin: All external cost have been charged to the importer.</p> <p>Cork: In all cases to date there has been no significant cost to the HSE for “additional” controls.</p> <p>A review of the cost structure to include internal costs is underway as part of the interagency working group on import control chaired by the FSAI.</p>	Dependent on outcome from an interagency import control working group.	<p>EHS Update April 2013:</p> <p>Dublin: An administration charge in place from 1st May 2013. Following the introduction of an administration fee, full cost recovery associated with additional official controls at import level in Dublin port is now achieved.</p> <p>Cork: There are no costs incurred by HSE.</p>		<p>April 2013</p> <p>Closed April 2013</p>

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	4.4.9	The EHS does not have an internal audit system in place.	<p>Dublin & Cork:</p> <p>Regulation 882/2004 states that 'Competent authorities shall carry out internal audits or may have external audits carried out....'.</p> <p>The national internal audit function is being developed. The HSE is currently subject to external audit by the FSAI and the FVO.</p>		The HSE EHS Quality Assurance operational unit established incorporating internal audit. Initial audit underway.		August 2016




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