

## AUDIT REPORT

Audit of Official Controls in  
The Dairy Production  
Chain

Dairy Controls and  
Certification Division of  
The Department of  
Agriculture Food and The  
Marine.

**CORRECTIVE ACTION PLAN**  
**December 2024**



## **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 in The Dairy Production Chain

**Official agency:** DAFM

**Date of audit:** From July 2022 to Nov 2022

## 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	Audit findings	<p>Ensure official controls performed are effective, appropriate and where non-compliance is established, verify that:</p> <ul style="list-style-type: none"> <li>i. Actions taken to address identified non-compliance prevents further occurrences of such non-compliance.</li> <li>ii. The level of enforcement action is appropriate and proportionate with the severity of the non-compliance identified.</li> </ul>	<p>DCCD to review current procedures on the effectiveness and appropriateness of official controls where noncompliance is established and amend and implement new procedures as necessary.</p> <p>We will keep these findings under review during supervisory controls.</p>	<p>End of January 2024</p> <p>Ongoing review</p>	<p>Final SOP 24 Rev. 8 was provided and reviewed on the 16.8.24.</p>		<p>Closed 16.8.24</p>

## CORRECTIVE ACTION PLAN

2	Audit findings	<p>Ensure all relevant documented procedures and records are developed, in place, kept up to date and are adhered to.</p> <p>i. There is no document control procedure in place detailing the methods by which documentation is (for example) created, stored, approved, updated, published, archived, and disposed of. Several documents and records appended to various SOPs did not contain any evidence of document control.</p> <p>ii. There is no documented training procedure in place establishing the process to ensure that staff performing official controls receive appropriate training and keep up to date in their area of competence. The training program presented does not fully ensure that staff performing official controls receive in full the training referred to in points (a), (b) and (c) of Article 5(4). In addition, documented evidence of training completed against certain SOPs could not be demonstrated in all cases.</p>	<p>DCCD to develop a document control procedure.</p> <p>DCCD to develop a training procedure.</p>	<p>Completed SOP 5 Document Control, issued 08.12.2023</p> <p>Completed. SOP provided to audit team via email on 17/02/2023.</p>	<p>SOP 5 document control procedure provided on 4.3.24.and reviewed on 16.8.24</p> <p>SOP 32 Training provided on 4.3.24.and reviewed on 16.8.24</p>	<p>Closed 16.8.24</p> <p>Closed 16.8.24</p>
---	----------------	---	---	--	--	---

## CORRECTIVE ACTION PLAN

		<p>iii. Appendix V of SOP 24 does not specify how the risk rating scheme is to be applied to traders of milk products under the supervision of the DCCD.</p>	<p>DCCD to review the risk rating scheme applied.</p>	<p>Amended risk rating scheme will be available for the 2024 risk assessments.</p>	<p>SOP 24 Appendix I risk assessment matrix and CR4 to record outcome of risk assessment was provided on 4.3.24.and reviewed on 16.8.24</p>	<p>Partially closed. Further updates required from DCCD 20.12.24</p>	
		<p>iv. SOP 24 "Official control procedure" Rev 6 section 3.4 states, "For Category 2 non-compliance(s), Form CN 2 states a reasonable time limit for the Notice to be complied with, up to a maximum of 7 days." From one FBO file reviewed, it was noted that time frames of between two and four weeks were specified on the CN 2 forms for the completion of a Category 2 Non-compliance. This does not adhere to the time frame specified in SOP 24 which is 7 days for a Category 2 Non-compliance.</p>	<p>DCCD to remind staff of the requirements of SOP 24 section 3.4 via special memorandum.</p>	<p>Completed SM 27 of 2023 issued 08.12.2023</p>	<p>Special Memo SM 27 of 2023 was provided on 4.3.24 and reviewed on 16.8.24.</p>		<p>Closed 16.8.24</p>

## CORRECTIVE ACTION PLAN

		<p>v. SOP 26 "Water Sampling" Rev 3 section 2.1 states, "All areas of a food business operator's establishment should be sampled over time" and that "The objective of sampling is to determine the microbiological quality of the water at the point of use". From a review of one FBO file it was noted that water had only been sampled from a sampling point within a pilot plant twice yearly for the period of 2021 and 2022.</p> <p>vi. SOP 01 "Food Safety Sampling" Rev 15 Part I states "Planned sampling controls should be drawn up taking into account the risk assessed according to the classification of risks with reference to Annex 4". From one FBO file reviewed, it was noted that Food Safety and Process Hygiene sampling controls were not being completed in line with frequency established within SP1 (Annual Sampling Plan) 2021.</p>	<p>DCCD to remind staff of the requirements of SOP 26 Section 2.1 via special memorandum.</p> <p>DCCD are satisfied that the level of sampling carried out at this FBO in 2021 was appropriate given the small quantities produced and the reduced level of production in the premises. However, DCCD will review SOP 01 to include recording on the SP1 where the decision is taken to reduce sampling controls.</p>	<p>Completed SM 27 of 2023 issued 08.12.2023.</p> <p>End of December '23</p>	<p>Special Memo SM 27 of 2023 was provided on 4.3.24. and reviewed on 16.8.24.</p> <p>Special Memo 05 of 2024 was provided on 4.3.24. and reviewed on 16.8.24.</p> <p>DCCD 4.3.24: SOP 01 is currently being reviewed and the following text as outlined in the</p>		Closed 16.8.24
--	--	--	---	--	---	--	----------------

## CORRECTIVE ACTION PLAN

		<p>vii. Ensure that the register for approved / registered establishments is maintained up to date in line with Article 10 of the OCR. Ensure that the process adopted for the management of suspensions / revocations is effective. Ensure that the management of conditional approval and the extension of conditional approval meets the requirements of Article 148 of the OCR.</p>	<p>DCCD in conjunction with MHD will keep the register of approved / registered FBO's up to date.</p>	<p>On going updates.</p>	<p>special memo will be included in the revised SOP. "Sampling Officers should note in the comments column of SP1 sampling plan any potential deviations to the sampling plan due to reduced production and/or seasonal production.</p> <p>DCCD 4.3.24: The revised SOP 24 Audit checklist now contains a question on keeping approvals / registrations under review. The SOP 24 checklist was provided on 4.3.24.and reviewed on 16.8.24.</p>	<p>Open. The final SOP 01 is yet to be received. 19.11.24</p>	<p>Closed 16.8.24</p>
--	--	---	---	--------------------------	--	---	-----------------------

## 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)
			DCCD to review the processes and procedures relating to the management of suspensions, revocations and conditional approval and amend procedures as necessary.	End of Jan 2024	<p>DCCD 4.3.24: Approval / Registration – new Annex added to SOP 24 deals with the suspensions and revocations.</p> <p>This was provided on 4.3.24.and reviewed on 16.8.24.</p> <p>Appendix III (SOP 24) Approval and Registration Process was provided and reviewed on 16.8.24.</p>		

## 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)
3	Audit findings	Ensure that official controls are performed on all operators regularly on a risk basis and with appropriate frequencies as required by Article 9 (1) of the OCR.	DCCD to remind staff of the requirements of SOP 24 Section 2.3.1 via special memorandum.	Completed SM 27 of 2023 issued 08.12.2023.	DCCD 4.3.24: Special Memo SM 27 of 2023 This was provided on 4.3.24.and reviewed on 16.8.24. .		Closed 16.8.24

## CORRECTIVE ACTION PLAN

4	Audit findings	Ensure that all relevant food business operators and or activities performed by food business operators are approved / registered (Where required) by the DCCD and in compliance with Article 148 of the OCR, Regulation (EC) No. 852/2004, Regulation (EC) No. 853/2004 and are subject to the required official controls.	DCCD will keep the approval of an establishment under review when carrying out official controls to ensure that all relevant activities are subjected to official controls.	End of Jan 2024 & ongoing during official controls.	<p>DCCD 4.3.24: The revised SOP 24 Audit checklist now contains a question on keeping approvals / registrations under review. This was provided on 4.3.24.and reviewed on 16.8.24.</p> <p>DCCD 4.3.24: Approval / Registration – new Annex added to SOP 24 deals with the suspensions and revocations. This was provided on 4.3.24.and reviewed on 16.8.24.</p> <p>Appendix III (SOP</p>		Closed 16.8.24
---	----------------	---	---	---	--	--	----------------

## 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)
					24) Approval and Registration Process was provided and reviewed on 16.8.24.		
5	Audit findings	Ensure that all non-compliances with food law identified during on-site FBO audits by the FSAI team are closed out.	DCCD to follow up and verify closeout of non-compliances identified.	Completed			Closed – 5.9.23



Food Safety Authority of Ireland  
The Exchange, George's Dock, IFSC,  
Dublin 1, D01 P2V6

T +353 1 817 1300  
E [info@fsai.ie](mailto:info@fsai.ie)

 Join us on LinkedIn

 Follow us on Twitter @FSALinfo

 Say hi on Facebook

[www.fsai.ie](http://www.fsai.ie)