

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 2023



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: Department of Agriculture, Food and the Marine (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"> i. Actions taken to address identified non-compliance prevents further occurrences of such non-compliance. ii. The level of enforcement action is appropriate and proportionate with the severity of the non-compliance identified. 	<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 Jan 2024.</p> <p>Ongoing review.</p>			

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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>			
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		<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>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>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</p>	<p>DCCD to review the risk rating scheme applied.</p> <p>DCCD to remind staff of the requirements of SOP 24 section 3.4 via special memorandum.</p> <p>DCCD to remind staff of the requirements of SOP 26 Section 2.1 via special memorandum.</p>	<p>Amended risk rating scheme will be available for the 2024 risk assessments.</p> <p>Completed SM 27 of 2023 issued 08.12.2023.</p> <p>Completed SM 27 of 2023 issued 08.12.2023.</p>			
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		<p>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>					
	vi.	<p>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 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.</p> <p>However, DCCD will review SOP 01 to include recording on the SP1 where the decision is taken to reduce sampling controls.</p>	End of December ‘23			
	vii.	<p>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</p>	<p>DCCD in conjunction with MHD will keep the register of approved / registered FBO’s up to date.</p> <p>DCCD to review the processes and procedures relating to the management of suspensions, revocations and conditional approval</p>	On going updates.	End of Jan 2024		

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		Article 148 of the OCR.	and amend procedures as necessary.				
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.			
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.			
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			




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