

AUDIT REPORT

Audit of Food Business
Operator Compliance
with Meat Labelling and
Traceability
Requirements

MAY 2022



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1 Glossary

ABP	Animal by-products
AIMS	Animal Identification and Movement System
BCP	Border Control Post
CHED	Common Health Entry Document
DAFM	Department of Agriculture, Food and the Marine
EFSA	European Food Safety Authority
FBO	Food Business Operator
GFSI	Global Food Safety Initiative
FSAI	Food Safety Authority of Ireland
HACCP	Hazard Analysis Critical Control Points
HSE	Health Service Executive
LA	Local Authority
MAP	Modified Atmosphere Packaged

2 Executive summary

The Food Safety Authority of Ireland (FSAI) has overall responsibility for the enforcement of food law in Ireland, which is mainly carried out through service contracts with official agencies. The FSAI conducts targeted audits of food businesses to verify compliance with food law. These audits are conducted in addition to official controls by official agencies and help deliver the FSAI vision for safe and trustworthy food for everyone.

This audit focussed on food business operator (FBO) compliance with meat labelling and traceability requirements. It also considered the availability and accuracy of food information for non-prepacked meat sold at retail and food service establishments. A total of 27 unannounced, on-site audits of individual food business establishments were conducted as part of the project.

The completeness, accuracy and appropriateness of information provided on labels was evaluated during the audits. Overall there was a variable level of FBO compliance with meat labelling requirements for prepacked foods. Good practices were noted at some establishments during the audit project and included robust meat authenticity controls, including routine DNA speciation testing and the elective use of short supply chains for meat ingredients. More than 100 individual product labels were examined. The majority of labels examined had complete food information which, to the extent assessed, was accurate and appropriate. Non-compliance with labelling requirements for prepacked food was detected during audits of 18 out of 27 establishments. At five of these establishments the non-compliance was serious, including: forgery of an identification mark and use of inaccurate establishment approval numbers on labels; provision of misleading information (concerning meat species and Halal status); and complete absence of mandatory particulars including allergens. Other areas of non-compliance detected included: 'use by' dates not supported by adequate shelf-life validation studies; absence of various mandatory particulars (other than allergens or 'use by' dates); and breaches of poultry marketing standards. While not regarded as non-compliance, one FBO was applying 'use by' dates to frozen food where 'best before' dates would have been sufficient. This practice may cause unnecessary food waste.

Non-compliance with food information requirements for non-prepacked foods (in retail and food service settings) was detected during audits of five establishments. At one of these establishments the non-compliance was serious and related to provision of misleading information to consumers concerning the country of origin of poultry. Other areas of non-compliance detected included:

mandatory allergen information not available in written form; mandatory beef labelling information not complete and/or up-to-date; and country of origin of beef not being declared by food service establishments in accordance with national legislation.

The effectiveness of FBO's traceability systems was also evaluated during audits. Overall there was a variable level of compliance with meat traceability requirements. Good practices noted at some establishments during the audit project included: internal mass balance based traceability challenges; and retention of digital images of all labels, commercial documents and production records as part of an electronic traceability system. Non-compliance with traceability requirements was detected during audits of 10 out of 27 establishments. At five of these establishments the non-compliance was serious and included: one FBO being unable to identify their meat suppliers; lack of clarity concerning the status of certain material as either food intended for human consumption or animal by-products (ABP) not for human consumption; food not labelled or identified to facilitate traceability; significant quantities of food not accounted for; and customer addresses not available. Other areas of non-compliance detected included breakdowns in traceability such that meat could not be reliably traced back to the animal or group of animals from which it was obtained.

Non-compliance with other aspects of food law, outside the planned scope of the audit project, was detected during audits at 17 out of 27 establishments. At 14 of these establishments the non-compliance was considered serious. Examples of serious non-compliance detected included: inadequate pest control procedures; serious foreign body contamination risks; undertaking unapproved activities; inadequate controls for allergen hazards; poor carcass hygiene including visible faecal contamination; inadequate control of ABP; unlawful re-processing of returned meat with expired 'use by' dates; and freezing of fresh meat on its 'use by' date such that there would be no shelf-life remaining on completion of controlled defrosting. Other areas of non-compliance detected included: non-compliance with requirements for the production of minced meat; inadequate HACCP (Hazard Analysis Critical Control Points) based controls for rework; and inadequate maintenance of the cold-chain.

The audit project led to 10 formal enforcement actions by official agencies or the FSAI against six FBOs. 14 recommendations are made to strengthen compliance with food law. One recommendation is made to FBOs to minimise food waste. The FSAI will collaborate with official agencies to explore opportunities to strengthen the effectiveness of official controls at detecting and responding to non-compliance with food law.

3 Introduction

The FSAI has overall responsibility for the enforcement of food law in Ireland, which is mainly carried out through service contract arrangements with [official agencies](#). The FSAI conducts targeted audits of food businesses to verify compliance with food law. These audits are conducted in addition to official controls by official agencies and help deliver the FSAI vision for safe and trustworthy food for everyone. The official agencies responsible for supervising establishments within the scope of this audit project were:

- [The Health Service Executive \(HSE\)](#)
- [The Department of Agriculture, Food and the Marine \(DAFM\)](#)
- [Local Authorities \(LAs\)](#)

This targeted audit was originally scheduled to be undertaken as part of the FSAI's 2020 planned programme of audits. However, on-site activities were delayed due to the impact of the Covid-19 pandemic and were carried out between August 2021 and March 2022.

3.1 Audit objective

The primary objective of this audit project was to verify FBO compliance with applicable food law.

3.2 Audit scope

The audit project evaluated FBO controls and arrangements for compliance with meat labelling and traceability requirements. For the purposes of this audit project 'meat' includes fresh and frozen meat, minced meat, meat preparations and meat products from all species. The audit project also evaluated the availability and accuracy of food information for non-prepacked meat at retail and food service establishments. Matters of evident concern, outside the planned scope of the audit, were also considered where they arose.

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 178/2002 of the European Parliament and of the Council of 28 January 2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety](#)
- [Regulation \(EC\) No 852/2004 of the European Parliament and of the Council of 29 April 2004 on the hygiene of foodstuffs](#)
- [Regulation \(EC\) No 853/2004 of the European Parliament and of the Council of 29 April 2004 laying down specific hygiene rules for food of animal origin](#)
- [Commission Regulation \(EC\) No 2073/2005 of 15 November 2005 on microbiological criteria for foodstuffs](#)
- [European Union \(Food and Feed Hygiene\) Regulations 2020 \(S.I. No. 22/2020\) \(as amended\)](#)
- [European Communities \(Hygiene of Foodstuffs\) Regulations 2006 \(S.I. No. 369/2006\) \(as amended\)](#)
- [European Union \(Microbiological Criteria for Foodstuffs\) Regulations 2012 \(S.I. No. 474/2012\) \(as amended\)](#)
- [European Communities \(General Food Law\) Regulations 2007 \(S.I. No. 747/2007\) \(as amended\)](#)

Provision of food information to consumers

- [Regulation \(EU\) No 1169/2011 of the European Parliament and of the Council of 25 October 2011 on the provision of food information to consumers](#)
- [European Union \(Provision of Food Information to Consumers\) Regulations 2014 \(S.I. No. 556 of 2014\) \(as amended\)](#)
- [Health \(Provision of Food Allergen Information to Consumers in respect of Non-Prepacked Food\) Regulations 2014 \(S.I. 489 of 2014\)](#)

Beef & veal labelling

- [Regulation \(EC\) No 1760/2000 of the European Parliament and of the Council of 17 July 2000 establishing a system for the identification and registration of bovine animals and regarding the labelling of beef and beef products](#)
- [Commission Regulation \(EC\) No 1825/2000 of 25 August 2000 laying down detailed rules for the application of Regulation \(EC\) No 1760/2000 of the European Parliament and of the Council as regards the labelling of beef and beef products](#)
- [European Communities \(Labelling of Beef and Beef Products\) Regulations 2000 \(S.I. No. 435 of 2000\) \(as amended\)](#)
- [Health \(Country of Origin of Beef\) Regulations 2006 \(S.I. No. 307 of 2006\) \(as amended\)](#)
- [European Communities \(Marketing of meat of bovine animals aged 12 months or less\) Regulations 2008 \(S.I. No. 245 of 2008\)](#)

Poultry meat Labelling

- [Regulation \(EU\) No 1308/2013 of the European Parliament and of the Council of 17 December 2013 establishing a common organisation of the markets in agricultural products](#)

- [European Communities \(Labelling and Marketing Standards for Poultrymeat\) Regulations 2010 \(S.I. No. 328 of 2010\)](#)

Organic food

- [Council Regulation \(EC\) No 834/2007 of 28 June 2007 on organic production and labelling of organic products](#)

Country of origin

- [Commission Implementing Regulation \(EU\) No 1337/2013 of 13 December 2013 laying down rules for the application of Regulation \(EU\) No 1169/2011 of the European Parliament and of the Council as regards the indication of the country of origin or place of provenance for fresh, chilled and frozen meat of swine, sheep, goats and poultry](#)
- [Commission Implementing Regulation \(EU\) 2018/775 of 28 May 2018 laying down rules for the application of Article 26\(3\) of Regulation \(EU\) No 1169/2011 of the European Parliament and of the Council on the provision of food information to consumers, as regards the rules for indicating the country of origin or place of provenance of the primary ingredient of a food](#)
- [European Union \(Origin Labelling of Meat\) Regulations 2015 \(S.I. No. 113 of 2015\)](#)

Reference Documents

- [FSAI Guidance Note 10 - Product Recall and Traceability](#)
- [FSAI Guidance Note 17 - The Labelling of Meat and Meat as an Ingredient](#)
- [FSAI Guidance Note 18 – Validation of product shelf-life](#)
- [FSAI Guidance Note 28 – Food Allergen Information for Non-Prepacked Foods](#)

- [European Union Reference Laboratory for *Listeria monocytogenes* Technical Guidance Document on challenge tests and durability studies for assessing shelf-life of ready-to-eat foods related to *Listeria monocytogenes* \(Version 4 of 1 July 2021\)](#)
- [FSAI Guidelines for Environmental Health Officers for Enforcement of the Health \(Country of Origin of Beef\) Regulations 2006 \(S.I. No. 307 of 2006\)](#)
- [FSAI leaflet - Advice for Caterers on the Country of Origin of Beef Labelling Requirements](#)
- [European Food Safety Authority Guidance on date marking and related food information](#)

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](#).

The audit project commenced at ten consumer-facing retail and food service establishments. Nine of these establishments were selected randomly for audit, one was selected for audit as part of a forward traceability exercise.

A cross section of establishments were selected for audit to include a range of food business types such as: supermarkets; butchers; restaurants and take-aways. Audit trails developed from retail and food service establishments informed the selection of 12 of the 17 upstream establishments audited. Five upstream establishments were selected on a targeted basis where information or intelligence indicated increased potential for non-compliance.

The audit comprised of 27 unannounced¹, on-site audits of individual food business establishments including:

- Six retail establishments supervised by the HSE. These included: two large supermarkets (one national chain and one international chain); a cash and carry; a traditional butcher (co-located with a low-capacity slaughterhouse, separately supervised by a LA); a specialist

¹ Each supervising official agency was notified in advance of each audit so that the relevant inspector could accompany the FSAI audit team.

retailer/butcher and a small retailer.

- Four food service establishments supervised by the HSE. These included two quick service restaurants (one national chain and one international chain), an independent take-away and a hotel/restaurant.
- Two storage and distribution establishments, one supervised by the HSE and the other supervised by a LA. One participated in a private food safety certification programme (non-Global Food Safety Initiative (GFSI) recognised).
- Ten standalone meat cutting and/or processing establishments, five supervised by DAFM and four by LAs. Six of these establishments participated in GFSI recognised food safety certification programmes, four participated in national private quality assurance schemes and one also held third party Organic and Halal certifications.
- Five slaughterhouses, three supervised by DAFM and two supervised by LAs. One of the Local Authority (LA) supervised slaughterhouses was designated a 'low-capacity slaughterhouse' as defined by Article 2 of Regulation (EU) 2019/624. Four slaughterhouses were co-located with cutting and/or processing operations and one was co-located with a traditional retail butcher (separately supervised by the HSE). Three slaughterhouses processed red meat and two processed poultry meat. Three of these establishments participated in GFSI recognised food safety certification programmes and in national private quality assurance schemes.

At the opening meeting of each individual audit, the FSAI 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, labels, documented procedures and operational controls were evaluated as appropriate. During the audit project over one hundred individual product labels were examined and sixty-six 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. In order to address queries which arose during the audit project, supplementary inspections and enquiries were conducted by the FSAI and official agencies where necessary.

4 Summary of audit findings

4.1 Non-compliance with food law

Non-compliance with food law was detected in 24 out of 27 establishments audited. In 14 establishments the non-compliance was considered serious. During the audits of the 24 establishments:

- Non-compliance with food labelling (food information) requirements for prepacked foods was detected at 18 establishments. At five of these establishments the non-compliance was considered serious.
- Non-compliance with food information requirements for non-prepacked foods (at retail and food service establishments) was detected at five establishments. At one establishment the non-compliance was considered serious.
- Non-compliance with traceability requirements was detected at 10 establishments. At five establishments the non-compliance was considered serious. Of the 66 traceability challenges conducted, non-compliance with traceability requirements was identified during 19.
- Non-compliance with other requirements of food law was detected at 17 establishments. At 14 establishments the non-compliance was considered serious.

4.2 Traceability of imported foods

The FSAI audit team verified that five consignments of meat from outside the European Union were traceable and had been legally imported. Two of these consignments originated in Thailand with others from China, Great Britain and Ukraine. In all cases the FSAI audit team confirmed that:

- The consignment could be traced back to an establishment (approved to export to the European Union) in the country of origin.
- A validated Common Health Entry Document (CHED) was available to demonstrate that the consignment had entered the European Union legally through a Border Control Post (BCP) where it was subject to required veterinary food safety checks.

4.3 Registration and approval of establishments

The FSAI audit team verified that establishments involved in the production, processing and distribution of meat were either registered or, where required, approved in accordance with food law. Twenty six out of the twenty seven establishments audited were either registered or approved as required. One food service establishment audited was not registered with the relevant official agency.

During the audit project, five additional establishments which were not registered or approved, were identified as a result of traceability challenges. Four were located in Ireland; including three meat traders/brokers and a meat transporter. One establishment was located in another European Union member state.

Where establishments operate illegally without registration or approval, and are not known to official agencies, they are not subject to planned official controls to verify compliance with food law and pose a potentially increased risk to consumer's health and interests.

A 2013 DAFM [report](#) on Equine DNA and mislabelling of processed beef recommended that "All traders/agents of meat operating in Ireland should be registered as Food Business Operators".

4.4 Formal enforcement actions

In addition to each FBO being provided with an individual audit report, audit findings resulted in 10 formal enforcement actions against 6 FBOs:

	Enforcement Order Type	Food Business Type	Reasons
1	Closure Order Prosecution	Food service Take-away	Closure Order for: inadequate procedures to control pests, poor cleaning, premises not in good repair, food not protected against contamination, food stored at unsafe temperatures, inadequate handwashing facilities, lack of HACCP based procedures. Prosecution proceedings followed non-compliance with Closure Order.
2	Prohibition Order Compliance Notices (x3)	Meat cutting and processing plant	Product produced from raw material with expired 'use by' date, inadequate traceability, inadequate control of freezing operations, operating outside scope of approval, provision of misleading information to authorised officers, inadequate shelf-life validation.
3	Compliance Notice	Meat cutting and processing plant	Inadequate traceability, inadequate labelling, inadequate control of ABP, food contamination, operating outside scope of approval.
4	Compliance Notice	Meat transporter	Operating without registration and failed to register when requested.
5	Fixed Payment Notice	Meat storage and transport	Labelling meat with misleading identification marks and approval numbers.
6	Compliance Notice	Poultry slaughterhouse	Inadequate control (including inadequate identification and traceability) of ABP.

5 Detailed findings by sector of the food chain audited

5.1 Retail establishments

Six retail establishments were selected for audit. These included: two large supermarkets; a cash and carry; a traditional butcher; a specialist retailer/butcher and a small retailer. All establishments were selected randomly for audit and were registered with the relevant official agency in compliance with Article 6 of Regulation (EC) 852/2004.

5.1.1 Labelling of prepacked meat at retail establishments

The labels of 36 prepacked foods were examined. These included fresh and frozen meat, minced meat, meat preparations and meat products. 21 contained all the required information. Non-compliances were noted in relation to 15 prepacked foods:

- At a large supermarket three prepacked meats had not been labelled with an identification mark by the establishment of origin as required by Article 5 of Regulation (EC) 853/2004. It was subsequently established that all three products originated from the same approved cutting plant. This matter was followed-up with the FBO of the establishment of origin and was corrected immediately.
- At a cash and carry prepacked pork sausages were not labelled with a nutrition declaration, food additives were incorrectly declared and the storage instructions were illegible, contrary to the requirements of Articles 9 and 13 of Regulation (EU) 1169/2011. This matter was followed-up by the official agency responsible for supervising the establishment of origin.
- At the traditional butcher, allergens were not clearly legible within the ingredients of a meat product supplied by another establishment, contrary to the requirements of Article 13 of Regulation (EU) 1169/2011. This appeared to be due to a printing error and was followed-up by the official agency responsible for supervising the establishment of origin.
- At the specialist retailer/butcher one frozen meat product on sale was not labelled with any of the mandatory particulars listed in Article 9 of Regulation (EU) 1169/2011. It appeared that this product had been decanted from outer packaging and was not intended for individual resale. The labels of seven prepacked foods including meat and meat products

did not contain some of the mandatory particulars listed in Article 9 of Regulation (EU) 1169/2011. Omissions included: instructions for use; storage instructions; incorrect presentation of nutrition information; the name or business name and address of the FBO responsible for food information. In addition some labels did not contain the approval number and name of the member state or third country of slaughter and cutting as required by Article 13 of Regulation (EC) 1760/2000. Most of these products originated from the same supplier which was also subject to audit.

- At the small retailer two meat products on sale were not labelled with any of the mandatory particulars listed in Article 9 of Regulation (EU) 1169/2011. It appeared that both products had been decanted from outer packaging and were not intended for individual resale.

5.1.2 Labelling/presentation of non-prepacked meat at retail establishments

The traditional butcher and specialist retailer/butcher audited both provided mandatory beef labelling information for non-prepacked beef, as required under Regulation (EC) 1760/2000 and Regulation (EC) 1825/2000, using whiteboards. At the traditional butcher, the whiteboard did not contain the approval number of the slaughterhouse. In addition, allergen information was not readily available for some non-prepacked foods which contained allergens as required by the Health (Provision of Food Allergen Information to Consumers in respect of Non-Prepacked Food) Regulations 2014 (S.I. 489 of 2014). At the specialist retailer/butcher it was noted that the information on the whiteboard was not up-to-date when compared with the original labels associated with the meat which was on display for sale.

5.1.3 Traceability at retail establishments

All retail establishments audited had effective supplier traceability arrangements in place to allow foods to be traced one step back in compliance with Article 18 of Regulation (EC) 178/2002 and Article 3 of Regulation (EU) 931/2011. For those foods labelled with identification marks, these marks were valid and facilitated traceability to the relevant establishment of origin.

Two of the establishments audited (a cash and carry and a traditional butcher) supplied food to other establishments. The cash and carry had effective customer traceability arrangements in place to allow foods to be traced one step forwards in compliance with Article 18 of Regulation

(EC) 178/2002 and Article 3 of Regulation (EU) 931/2011. At the traditional butcher, retained traceability records did not always contain all the information required by Article 3 of Regulation (EU) 931/2011 including: the address of the FBO to whom food was dispatched; a reference identifying the lot, batch or consignment, as appropriate; the date of dispatch; and the volume or quantity of the food.

At the cash and carry two meat products which originated outside the European Union (one from China and one from Thailand) were successfully traced back to approved establishments in the respective countries of origin. In both cases validated CHEDs were available to demonstrate that the foods had entered the European Union legally through BCPs where the foods were subject to required veterinary food safety checks in accordance with the requirements of Section II of Regulation (EU) 2017/625.

5.1.4 Non-compliance with food law outside the planned scope of the audit at retail establishments

At the specialist retailer/butcher audited, a large number of flies were noted in the retail and butchery areas. Flies were observed on food contact surfaces and equipment posing a risk of food contamination, contrary to the requirements of Article 4 of Regulation (EC) 852/2004. This was followed-up by the official agency responsible for supervising the establishment.

5.2 Food service establishments

Four food service establishments were selected for audit. These included two quick service restaurants, an independent take-away and a hotel/restaurant. Three were selected randomly for audit. One was selected on the basis of a forward trace from a cash and carry. Three establishments were registered with the relevant official agency in accordance with Article 6 of Regulation (EC) 852/2004. The FBO of one establishment (an independent take-away) had failed to notify the relevant official agency with a view to registration of the establishment.

5.2.1 Labelling/presentation of non-prepacked meat at food service establishments

All four establishments audited served beef or beef products falling within the scope of the Health (Country of Origin of Beef) Regulations 2006 (S.I. No. 307 of 2006). Both quick service restaurants clearly displayed the country of origin of beef as required by these regulations. Traceability checks at both establishments indicated that the declared country of origin (Ireland) was accurate. The country of origin of beef was not provided at the hotel/restaurant or the independent take-away as required by the Health (Country of Origin of Beef) Regulations 2006 (S.I. No. 307 of 2006).

Both quick service restaurants made voluntary claims about some meat products sold. In one establishment these claims related to country of origin, as well as production of beef patties under a particular quality assurance scheme. Audit checks verified that these claims were valid. The other establishment made several claims about the country of origin of specific products, audit checks also verified the validity of these specific claims. This establishment also made a more general claim that it only served “100% Irish Chicken”. Upstream audit checks found that this claim was not valid as one meat product was produced using a mixture of Irish and other EU origin chicken. The claim was therefore considered misleading, contrary to Article 16 of Regulation (EC) 178/2002. This issue appeared to have arisen from the lack of an appropriate, agreed product specification between the FBO of the quick service restaurant and the FBO of the supplier of the meat product in question. Following the audit, the FBO undertook a review of product specifications with all their suppliers to prevent reoccurrence of this issue.

Allergen information for non-prepacked food was provided at three of the four establishments including both quick service restaurants and the hotel/restaurant. No allergen information was provided to consumers at the independent take-away as required by the Health (Provision of Food Allergen Information to Consumers in respect of Non-Prepacked Food) Regulations 2014 (S.I. 489 of 2014).

5.2.2 Traceability at food service establishments

Three of the four establishments had effective supplier traceability arrangements in place to allow foods to be traced one step back in compliance with Article 18 of Regulation (EC) 178/2002. At one establishment (an independent take away) no delivery records or commercial documents from suppliers were available to allow foods to be effectively traced one step back to the immediate suppliers. However, product labels and identification marks allowed these foods to be traced back to their establishments of origin.

One establishment (a quick service restaurant) occasionally supplied food to other establishments within the same chain. There was a dedicated transfer book to maintain the traceability of such foods in compliance with Article 18 of Regulation (EC) 178/2002. One quick service restaurant audited recorded the specific batch numbers of meat being used each day, consistent with best practice.

5.2.3 Non-compliance with food law outside the planned scope of the audit at food service establishments

Some non-compliance related to the effectiveness and implementation of HACCP based procedures was noted at the hotel/restaurant audited, contrary to the requirements of Article 5 of Regulation (EC) 852/2004.

Serious non-compliance with food law, including breaches of Articles 4 and 5 of Regulation (EC) 852/2004 was noted at the independent take-away audited including (but not limited to): evidence of rodent (mice) activity and flying insect activity; poor cleaning; food not protected against contamination; foods being held at unsafe temperatures; inadequate facilities for hand washing and lack of effective HACCP based food safety management procedures. As a result of the serious nature of the non-compliance and the associated risk to public health, a Closure Order was served on the FBO by the FSAI requiring the immediate closure of the establishment. The FBO repeatedly failed to comply with this Closure Order and was subsequently prosecuted.

5.3 Storage and distribution establishments

Two storage and distribution establishments were selected for audit. One was selected based on an audit trail developed at a food service establishment, the other was selected randomly. Due to the nature of the activities carried out, the first establishment was approved by an official agency in accordance with Article 4 of Regulation (EC) 853/2004. The second establishment was registered with an official agency in accordance with Article 6 of Regulation (EC) 852/2004. This establishment also had a retail outlet on the same site which was separately registered.

5.3.1 Labelling at storage and distribution establishments

In general, products under the ownership of the FBO at the first establishment were labelled in compliance with legal requirements. However, meat being stored on behalf of a poultry slaughterhouse was not labelled in compliance with legal requirements. In particular, the FSAI audit team noted that the identification mark had not been applied in such a way that it is destroyed when the packaging is opened, contrary to Article 5 of Regulation (EC) 853/2004.

In general, products at the second establishment were appropriately labelled in compliance with legal requirements. However, labels on poultry which had been frozen from fresh at external cold storage facilities did not include the date of freezing as required by Annex III of Regulation (EU) 1169/2011.

5.3.2 Traceability at storage and distribution establishments

The first establishment had satisfactory supplier and customer traceability arrangements in place, in compliance with Article 18 of Regulation (EC) 178/2002 and Article 3 of Regulation (EU) 931/2011, for those foods under the ownership of the FBO. Serious non-compliances were noted in relation to the traceability of material being stored on behalf of a customer (poultry slaughterhouse) including the absence of appropriate identification marking. Information required in accordance with Article 3 of Regulation (EU) 931/2011 could not be provided to the FSAI audit team. The FSAI audit team concluded that the intake and dispatch controls, intended to ensure the traceability of such foods, were ineffective.

When material being stored on behalf of a poultry slaughterhouse was examined, it included food intended for human consumption and Category 3 ABP (Animal By-products), not intended for human consumption. One particular pallet contained a mixture of food intended for human

consumption and ABP. The establishment was not registered for the storage of ABP. The FBO was unaware that the material in question was ABP as it had not been identified as such by the consignor. A supplementary inspection with the official agency was carried out at the poultry slaughterhouse which consigned the material in question. This inspection detected serious non-compliances relating to identification and traceability of ABP including failure to complete required commercial documents. The official agency served a Compliance Notice on the FBO of the slaughterhouse.

The second establishment had generally satisfactory supplier and customer traceability arrangements in place, in compliance with Article 18 of Regulation (EC) 178/2002 and Article 3 of Regulation (EU) 931/2011, for foods other than those sent to external cold stores. However, the systems in place did not facilitate customer traceability according to specific batch numbers. A meat product which originated outside the European Union was successfully traced back to the approved establishment in the country of origin (Thailand). A validated CHED (Common Health Entry Document) was available to demonstrate that the food had entered the European Union legally through a BCP (Border Control Post) where the food was subject to required veterinary food safety checks in accordance with the requirements of Section II of Regulation (EU) 2017/625.

At the second establishment serious non-compliances, contrary to the requirements of Article 18 of Regulation (EC) 178/2002 and Article 3 of Regulation (EU) 931/2011, were noted in respect of the traceability of foods sent to, and returned from, external cold stores. Non-compliances included incomplete records and an inability to reconcile the quantities of food recorded on intake traceability documentation with the quantities in stock and dispatched.

5.3.3 Non-compliance with food law outside the planned scope of the audit at storage and distribution establishments

Non-compliances relating to identification and control of ABP were detected at both establishments. The first establishment was storing ABP without the requisite registration, contrary to the requirements of Article 23 of Regulation (EC) 1069/2009. The second establishment consigned ABP to other operators either without commercial documents or with incomplete commercial documents contrary to the requirements of Article 22 of Regulation (EC) 1069/2009 and Article 17 of Regulation (EU) 142/2011.

The FBO of the second establishment had an established practice whereby short-dated chilled products were sent to a third-party cold storage facility for freezing without appropriate traceability procedures or HACCP based food safety controls, contrary to the requirements of Article 18 of Regulation (EC) 178/2002, Article 3 of Regulation (EU) 931/2011 and Article 5 of Regulation (EC) 852/2004. The FSAI audit team noted that some consignments had been frozen down either on their use-by date or one day prior to their 'use by' date. This was contrary to the FBO's own procedures which required a minimum of three days of remaining shelf-life at the time of freezing. The FBO could not demonstrate that these products were completely frozen before the expiry of the relevant 'use by' date or that the original 'use by' date would not be exceeded upon completion of temperature-controlled defrosting. In response to the audit findings the FBO undertook a voluntary trade withdrawal of those products where the operator's own procedures had not been followed. The FSAI audit team established that a food business which had been supplied with frozen poultry (which had been frozen the day before its original 'use by' date) returned a quantity of the meat to the supplier as it was reported as being in an unsatisfactory condition due to bad odour.

5.4 Meat cutting and processing establishments

Fourteen establishments undertaking cutting and/or processing of meat were selected for audit. Ten of these were standalone establishments and four were co-located with slaughterhouses. For those establishments co-located with slaughterhouses this section refers only to the cutting and processing activities. Nine establishments were selected based on audit trails developed at retail and food service establishments. Four establishments were selected on a targeted basis where information or intelligence indicated increased potential for non-compliance. All establishments were approved by the relevant official agency in accordance with Article 4 of Regulation (EC) 853/2004.

5.4.1 Labelling at meat cutting and processing establishments

At four establishments labels and product specifications examined complied with legal requirements.

Two establishments audited routinely made allergen free ('gluten free') claims for specific products. The FSAI audit team confirmed that both establishments had validated HACCP based allergen controls in place which were subject to regular verification to ensure their ongoing effectiveness.

Results of analysis carried out on behalf of the FBOs indicated compliance with the regulated limit for gluten in 'gluten free' foods laid down in the Annex to Regulation (EU) 828/2014. Both establishments were also voluntarily certified in accordance with third party standards for gluten free foods.

One establishment routinely made 'organic' claims for specific products. The FSAI audit team confirmed that the establishment held the requisite organic certification and verified that meat used in organic production was sourced from a certified organic supplier. Four establishments routinely made 'Halal' claims. Two had appropriate controls in place, supported by voluntary third-party certification, to ensure the validity of these claims. The FSAI audit team considered that the 'Halal' claims made at the other two establishments were misleading to consumers, contrary to Article 16 of Regulation (EC) 178/2002.

The FBOs of several establishments audited routinely undertook DNA species testing as part of their food authenticity controls to verify the accuracy of food information provided to consumers. Several FBOs also undertook routine sampling and analysis for specific food allergens to verify the effectiveness of their HACCP based allergen control measures and ensure the accuracy of allergen information provided to consumers.

Non-compliance relating to labelling (food information) requirements was detected at 10 establishments. Serious non-compliance was confined to three establishments and included:

- At one multi-species cutting and processing establishment, a consignment of lamb was delivered accompanied by labels containing forged identification marks (contrary to Regulation 12 of S.I. No. 22/2020) and misleading establishment approval numbers contrary to Article 18 of Regulation (EC) 178/2002. Investigations by the FSAI and the official agency established that the labels in question had been issued by the supplier, and not the establishment audited, and that the supplier had cut the meat in question without approval to do so. A fixed payment notice was served on the FBO of the supplier by the relevant official agency.
- Two multi-species cutting and processing establishments misdescribed non-Halal beef as 'Halal,' contrary to Article 16 of Regulation (EC) 178/2002. One also misdescribed beef as

lamb contrary to Article 16 of Regulation (EC) 178/2002. Compliance Notices were served on the FBOs of both establishments in relation to these and other matters.

Other areas of non-compliance noted included:

- During an audit of a multi-species cutting and processing plant, the FSAI audit team noted there was a possible risk of unintentional allergen carryover due to the lack of a written and validated cleaning standard operating procedure for a mixer/blender where allergen containing products were processed prior to allergen-free products. Deficiencies in allergen control procedures or their implementation, with the potential to result in the presence of undeclared allergens in food, were noted during two other audits.
- At another multi-species cutting and processing plant there was a lapse in the effective implementation of controls intended to minimize the risk of unintentional meat species carryover associated with the use of shared equipment.
- During audits of four establishments, FBOs were unable to demonstrate that declared dates of minimum durability were justified by adequate shelf-life validation studies. For example:
 - At one establishment producing vacuum-packed raw minced meat preparations for the food service sector, although non-proteolytic *Clostridium botulinum* had been identified as a hazard in the FBO's HACCP based procedures, the appropriateness of the shelf-life had not been validated with respect to this hazard, contrary to Article 5 of Regulation (EC) 852/2004. At the same establishment, the FBO's procedures for laboratory analysis of samples for the purposes of shelf-life validation allowed foods to be stored at unrealistically low temperatures pending analysis which is not consistent with reasonably foreseeable conditions of distribution, storage and use.
 - At a second establishment, producing modified atmosphere packaged (MAP), ready-to-eat cooked meat products (capable of supporting the growth of *Listeria monocytogenes*) for the retail sector, shelf-life validation for *Listeria monocytogenes* was not fully in accordance with Article 3 and Annex II of Regulation (EC) 2073/2005. The FSAI audit team noted that the FBO could not provide

specifications for physico-chemical characteristics of foods such as pH and water activity (a_w) for all products. It was also noted that the approach to shelf-life validation for *Listeria monocytogenes* relied entirely on durability studies. Durability studies alone are not suitable to validate the microbiological shelf-life of such ready-to-eat foods with respect to *Listeria monocytogenes* because of a low prevalence, low level of contamination and heterogeneous distribution of *Listeria monocytogenes* contamination in solid products.

It was also noted that the FBO had not adequately validated the shelf-life of MAP, ready-to-eat cooked meat products with respect to non-proteolytic *Clostridium botulinum* contrary to Article 5 of Regulation (EC) 852/2004. In particular the FBO's approach to shelf-life validation with respect to non-proteolytic *Clostridium botulinum* failed to consider reasonably foreseeable conditions of distribution, storage and use following dispatch.

- During the audit of the establishment producing MAP, ready-to-eat cooked meat products, the FBO's method to approximate the declared nutrition values to the analysed nutrition values could not be established. For three products it was noted that the declared salt value was lower than the (average) analysed salt value. This approach is not in accordance with Article 31 of Regulation (EU) 1169/2011 and has the potential to mislead consumers contrary to Article 7 of Regulation (EU) 1169/2011. European Union guidance with regard to the setting of tolerances for nutrient values declared on a label states: *"For nutrients where consumers are generally interested in reducing their intakes (such as fats, sugars and salt/sodium), the declared values should not be established at the lower tolerance range whilst the measured or calculated average value would be higher than this declared value"*.
- Two establishments supplied previously frozen poultry meat as fresh contrary to the definition of 'fresh poultry meat' laid down in Part V of Regulation (EU) No 1308/2013.
- During several audits it was noted that one or more mandatory particulars were absent from labels (for example, instructions for use), were insufficient (for example, absence of storage instructions during thawing) or were not presented in the required format (for

example, nutrition declarations) contrary to Article 9, Article 30 and Article 32 of Regulation (EU) 1169/2011.

During an audit of a cutting plant producing packs of frozen cuts of raw meat, it was noted that products were labelled with 'use by' dates. While the choice of a 'use by' or 'best before' date is primarily a decision for the FBO, European Food Safety Authority (EFSA) Guidance on date marking and related food information states "When a product is distributed and stored frozen, growth of pathogenic microorganisms during the shelf-life is not expected, and a 'best before' date is appropriate." While the use of a 'use by' date in these circumstances does not constitute non-compliance with food law it may contribute to unnecessary food waste.

5.4.2 Traceability at meat cutting and processing establishments

Eight establishments had satisfactory supplier and customer traceability arrangements in place in compliance with Article 18 of Regulation (EC) 178/2002 and Article 3 of Regulation (EU) 931/2011. The traceability systems at several establishments exceeded legal requirements, examples of best practice included:

- Regular, robust own-checks (including mass balance exercises) to verify the effective functioning of the traceability systems in place.
- Sourcing meat using the shortest possible supply chains in order to minimize opportunities for fraudulent and deceptive practices along the supply chain.
- Retention of digital images of all labels, commercial documents and production records as part of an electronic traceability system.

At two establishments meat products which originated outside the European Union (one from Great Britain and one from Ukraine) were successfully traced back to approved establishments in the respective countries of origin. In both cases validated CHEDs were available to demonstrate that the foods had entered the European Union legally through BCPs, where the foods were subject to required veterinary food safety checks in accordance with the requirements of Section II of Regulation (EU) 2017/625.

Non-compliance with traceability requirements was noted at six establishments, in three of these establishments the non-compliance was considered serious:

- At one multi-species cutting plant serious non-compliances were noted including: incomplete intake records; significant discrepancies between the net quantities at intake of particular consignments of meat compared with the net quantities on hand and dispatched, resulting in the FBO being unable to reliably account for significant quantities of meat; meat not adequately labelled or identified to facilitate its traceability; complete customer address details not available; non-Halal beef, dispatched to a customer in another member state, misleadingly described as 'Halal' on associated commercial documents; and lack of reliable traceability for meat returned from customer establishments. The official agency served a Compliance Notice on the FBO of this establishment.
- At a second multi-species cutting and processing plant serious non-compliances were noted including: meat not adequately labelled or identified to facilitate its traceability; uncontrolled edits and amendments to electronic traceability records; falsification of traceability records in order to present previously frozen meat and poultry as if it were chilled/fresh; lack of reliable traceability for meat returned from customer establishments. The FSAI served a Prohibition Order and three Compliance Notices on the FBO of this establishment.
- At a third multi-species cutting and processing establishment when the net quantity at intake of a particular batch of meat (90 VL beef trim) was compared with the sum of the net quantity in stock and the net quantity dispatched (as minced beef), it was noted that the sum of the net quantity in stock and the net quantity dispatched exceeded the original net quantity at intake. During discussions, the FBO suggested that the discrepancy may be explained by the possible use of a different batch of raw material to produce some of the minced beef thereby undermining the link that is required to be maintained between meat and the animal or animals from which the meat was obtained, contrary to Article 1 of Regulation (EC) 1825/2000. Overall, the traceability system at this establishment did not ensure links between the identification of the meat and the animal or animals concerned.

Other areas of non-compliance noted included:

- At a fourth multi-species cutting and processing plant it was noted that a quantity of meat, for which there were no associated intake records, had been dispatched to another establishment. During traceability checks at this establishment two food traders, which were not registered with the relevant official agencies, were identified as facilitating the supply of certain meats.
- At a fifth multi-species cutting and processing plant, during a traceability challenge on a pack of minced beef from a retail establishment, the FBO was unable to establish a reliable link between the particular mince and the animal or animals from which the meat was obtained, contrary to Article 1 of Regulation (EC) 1825/2000. The FSAI audit team noted that this appeared to be an isolated issue relating to record keeping.
- During forward traceability checks at a red meat cutting plant (co-located with a slaughterhouse), it was noted that three customer establishments in Ireland including a food wholesaler and transporter, a food broker and an online meat retailer were not registered with the relevant official agency. Each FBO was advised of the need to register their establishment or activity. Two of these FBOs then completed the registration process. The third FBO did not follow the advice to register their establishment resulting in the service of a Compliance Notice. A fourth customer establishment, located in another member state, was not known to the relevant competent authority following enquiries they conducted in that member state.

During several audits FBOs were unable to provide some mandatory traceability information required by Article 18 of Regulation (EC) 178/2002 and Article 3 of Regulation (EU) 931/2011, such as:

- The name and address of the FBO to whom food is dispatched and the name and address of the consignee (owner), if different from the FBO to whom the food is dispatched. The absence of such information has the potential to impede the speed and effectiveness of product withdrawals and recalls.

- A reference identifying the lot, batch or consignment, as appropriate. This was particularly evident where the reference identifying the lot, batch or consignment was only contained on the food label and not the associated commercial documents. Not all FBOs recorded this information as part of their traceability systems.

5.4.3 Non-compliance with food law outside the planned scope of the audit at meat cutting and processing establishments

Examples of non-compliance with food law outside the planned scope of the audit at meat cutting and processing establishments included:

- Evidence of visible faecal contamination and extensive hair contamination was observed on health marked carcasses which had been accepted by an auditee following delivery/intake checks at a cutting plant, contrary to Articles 4 & 5 of Regulation (EC) 852/2004 and Article 3 of Regulation (EC) 853/2004.
- Evidence of extensive animal hair contamination was observed on health marked carcasses which had been accepted by an auditee following delivery/intake checks at a cutting plant. Despite this issue being brought to the attention of management, cuts of meat with visible animal hair contamination were prepared for dispatch during the audit, contrary to Article 4 of Regulation (EC) 852/2004.
- Repetitive failures to comply with process hygiene criteria for *Escherichia coli* were observed at an establishment producing minced poultry meat, contrary to Articles 3 & 7 of Regulation (EC) 2073/2005. At the time of the audit, inadequate environmental hygiene was observed in the mincing room, contrary to Article 4 of Regulation (EC) 852/2004.
- A beef rump which was contaminated by floor paint had been vacuum packed and prepared for dispatch at a cutting plant, contrary to Article 14 of Regulation (EC) 178/2002 and Article 4 of Regulation (EC) 852/2004. The FSAI audit team noted that the floor at this establishment was badly deteriorated in an area where exposed meat was handled.
- An establishment transporting frozen meat products (labelled as requiring storage at “-18°C or colder”) together with refrigerated foods in a single compartment vehicle capable of

storing foods only at refrigerated temperatures. This resulted in the surface temperature of the frozen foods reaching -1.9°C , contrary to Article 4 of Regulation (EC) 852/2004. This practice was also contrary to the auditee's own HACCP based procedures and therefore contrary to Article 5 of Regulation (EC) 852/2004.

- Inadequate HACCP based food safety controls for rework processes at several establishments, contrary to Article 5 of Regulation (EC) 852/2004.
- Evidence of unlawful reprocessing of returned meat with expired 'use by' dates at one establishment, contrary to Article 14 of Regulation (EC) 178/2002.
- Inadequate controls relating to identification, description and disposal of ABP, contrary to the requirements of Articles 4, 7 and 22 of Regulation (EC) 1069/2009 and Article 17 of Regulation (EU) 142/2011, at several establishments. For example:
 - Failure to identify material as ABP as soon as it is generated.
 - Failure to accurately describe ABP. For example, one FBO had described Category 3 ABP of equine origin as "Cat 3 beef" on commercial documents.
 - Failure to fully complete ABP commercial documents, in particular with an accurate description of the quantity of the material. In some cases the quantity of the material was not being checked by the consignor and only at the destination.
 - Failure to produce ABP commercial documents at least in triplicate and for the producer to retain one of the copies.
- General hygiene deficiencies, contrary to Article 4 of Regulation (EC) 852/2004, at several establishments. For example: damaged structures and equipment no longer capable of being effectively cleaned and disinfected; condensation on overhead surfaces; and risk of food contamination (including serious foreign body contamination risks).

- Undertaking unapproved activities, for example an establishment that was only approved for cutting had undertaken processing of minced meat and meat preparations, contrary to Article 4 of Regulation (EC) 853/2004.

5.5 Slaughterhouses

Five slaughterhouses were selected for audit. One was designated a 'low-capacity slaughterhouse' as defined by Article 2 of Regulation (EU) 2019/624. Four slaughterhouses were co-located with cutting and/or processing plants and one was co-located with a traditional retail butcher. Three slaughterhouses processed red meat and two processed poultry meat. This section refers only to the slaughterhouse activities and not those activities carried out at co-located cutting plants, processing plants or retail operations. Four establishments were selected based on audit trails developed at retail and food service establishments. One establishment was selected on a targeted basis where information or intelligence indicated increased potential for non-compliance. All establishments were approved by the relevant official agency in accordance with Article 4 of Regulation (EC) 853/2004.

5.5.1 Labelling at slaughterhouses

At all slaughterhouses audited, meat was labelled and identified to facilitate traceability in accordance with Article 18 of Regulation (EC) 178/2002. To the extent assessed meat was accurately described, including where specific breed claims were made.

5.5.2 Traceability at slaughterhouses

All slaughterhouses audited had satisfactory systems and procedures in place, in compliance with Article 18 of Regulation (EC) 178/2002, to ensure the traceability of food producing animals and food. At all slaughterhouses audited the traceability systems in place enabled a reliable link to be maintained between meat and the animal or group of animals from which the meat was obtained as required by Article 1 of Regulation (EC) 1825/2000 and Article 3 of Regulation (EU) 1337/2013, as appropriate. Checks carried out during audits allowed meat to be reliably traced back to relevant animal intake documentation.

5.5.3 Non-compliance with food law outside the planned scope of the audit at slaughterhouses

Examples of non-compliance with food law outside the planned scope of the audit at slaughterhouses included:

- At one red meat slaughterhouse which was selected for audit on a targeted basis, and which had a poor history of compliance, the following serious non-compliances were detected:
 - Where a bovine animal was accepted for slaughter by the FBO but rejected for slaughter following veterinary ante-mortem inspection, subsequently euthanized, and sent to a knackery, records in the Animal Identification and Movement System (AIMS) only reflected the movement from the farm of origin to the knackery. The movements from the farm to the slaughterhouse and the slaughterhouse to the knackery were not recorded.
 - Obvious visible faecal contamination was observed on a bovine carcass after completion of the final carcass inspection by the FBO (and Veterinary post-mortem inspection), contrary to Article 3 of Regulation (EC) 853/2004. The FBO had previously been issued with formal enforcement notices by the official agency in respect of similar non-compliance. During the audit project, the FSAI audit team noted that meat originating at this establishment had been quarantined during intake checks by the FBO of a meat processing plant due to the presence of visible faecal contamination. Faecal contamination on dressed carcasses may indicate potential exposure to pathogenic microorganisms such as *Salmonella* spp. and verotoxigenic *Escherichia coli* (pathogenic VTEC).
 - Although outside the control of the FBO:
 - It could not be verified that ante-mortem inspections on those animals subject to on-farm emergency slaughter were carried out by official veterinarians (formally appointed under Article 5 of Regulation (EU) 2017/625) as required by Article 4 of Regulation (EU) 2017/624. It was further noted that the health certificates

accompanying the bodies of animals subject to on-farm emergency slaughter to the slaughterhouse were not the model health certificate as set out in Annex V to Regulation (EU) 2019/628.

- At the time of the audit there were several bovine carcasses in the carcass chiller which derived from animals which were subject to on-farm emergency slaughter. When the relevant animal identifications were checked in the AIMS it was noted that none were recorded as on-farm emergency slaughters.
- At two poultry slaughterhouses heavy condensation was observed on surfaces above exposed poultry creating a risk of contamination, contrary to Article 4 of Regulation (EC) 852/2004.
- At one poultry slaughterhouse, commercial documents were not being completed for consignments of Category 1 ABP (which included poultry carcasses condemned during Veterinary post-mortem inspection), contrary to the requirements of Article 22 of Regulation (EC) 1069/2009 and Article 17 of Regulation (EU) 142/2011. Commercial documents in respect of these consignments were subsequently being completed by the consignee only, consequently it was not possible for the FSAI audit team to establish the quantity of material consigned at the point of dispatch.

6 Conclusions

Overall there was a variable level of FBO compliance with meat labelling and traceability requirements. Serious non-compliances with these requirements were confined to a small number of establishments audited. Some of the non-compliances noted during the audit project undermined the safety of the foods concerned or resulted in the provision of misleading information to consumers. The audit findings indicate a need for some FBOs to strengthen compliance with meat labelling and traceability requirements and suggest that some FBOs do not make effective use of the available guidance and resources in these areas.

Non-compliances outside the planned scope of the audit project were detected at the majority of establishments audited, indicating a need for industry to strengthen compliance with food law generally as part of an overall food safety culture.

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 ensure that foods are labelled in compliance with legal requirements and that food information (including for non-prepacked foods) is accurate and does not mislead consumers. FBOs should make use of available resources including [FSAI Guidance Note 17 - The Labelling of Meat and Meat as an Ingredient](#) and the [European Union Food Labelling Information System](#).
2. Where FBOs have foods produced on their behalf, they must have appropriate arrangements in place with their suppliers to ensure the accuracy of the food information provided to consumers.
3. FBOs must ensure compliance with traceability requirements including, where applicable, product specific requirements. FBOs should make use of available resources including [FSAI Guidance Note 10 - Product Recall and Traceability](#).

4. FBOs must ensure that product shelf-life is supported by appropriate shelf-life validation studies such that foods will comply with applicable food safety requirements throughout their shelf-life, under reasonably foreseeable conditions of distribution, storage and use. FBOs should make use of available resources including [FSAI Guidance Note 18 on Validation of Product Shelf-life](#). Shelf-life validation studies must consider the relevant food safety hazards for the product identified in the operator's HACCP based food safety management procedures.
5. FBOs that label foods must ensure that nutrition declarations are accurate and supported by appropriate analyses or calculations.
6. FBOs must ensure that their HACCP based food safety management procedures identify relevant food safety hazards at rework process steps.
7. FBOs must ensure that all relevant allergen hazards are identified and subject to appropriate control(s) as part of their HACCP based food safety management procedures. Control measures must be validated and subject to regular verification to ensure their effectiveness.
8. FBOs of food service establishments must ensure that the country of origin of beef is declared in accordance with national legislation. FBOs should make use of the [FSAI Advice for Caterers on the Country of Origin of Beef Labelling Requirements](#).
9. FBOs of retail establishments must ensure that mandatory information is provided in relation to non-prepacked beef. FBOs should make use of available resources including [FSAI Guidance Note 17 - The Labelling of Meat and Meat as an Ingredient](#).
10. FBOs selling non-prepacked food must declare food allergen information in written format at an easily identified (conspicuous) and accessible location (or locations) on the premises. FBOs should make use of available resources including [FSAI Guidance Note No. 28 on Food Allergen Information for Non-Prepacked Foods](#).

11. FBOs must ensure ABP are handled in accordance with applicable legislation. In particular, that ABP are correctly identified and that traceability is supported by accurate commercial documents.
12. FBOs must ensure ongoing compliance with general and specific hygiene requirements as part of an overall food safety culture.
13. FBOs should apply root cause analysis methodologies, as appropriate, when determining appropriate corrective and preventive actions in response to this audit report.
14. 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. Official agencies should apply root cause analysis methodologies, as appropriate, when determining any corrective and preventive actions relating to the effectiveness of official controls.
15. To minimise unnecessary food waste, FBOs should carefully consider whether a 'use by' date or 'best before' date should be applied to labels of prepacked frozen foods.



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