

AUDIT
REPORT

Audit of Official Controls
Relating to On Farm
Emergency Slaughtered
Bovine Animals –
Mayo County Council

JULY 2013



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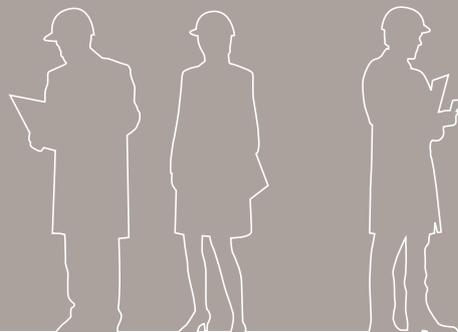


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1. GLOSSARY

AIM	Animal Identification and Movement System
DAFM	Department of Agriculture Food and the Marine
FSAI	Food Safety Authority of Ireland
NBAS	National Beef Assurance Scheme
SOP	Standard Operating Procedure
VPN	Veterinary Procedural Notice

2. EXECUTIVE SUMMARY

The Food Safety Authority of Ireland (FSAI) is responsible for the enforcement of all food legislation in Ireland which is carried out through service contracts with official agencies. As part of its legal mandate, the FSAI is required to verify that the system of official controls is working effectively. For the purposes of assessing the delivery of official controls by Mayo County Council, this audit was carried out on official controls in relation to on farm emergency slaughter. One food business operator supervised by Mayo Co. Council, where acutely injured bovine animals which have been slaughtered on farm are presented to be dressed and cut for human consumption, was also visited.

Mayo Co Council has approved the food business operator visited. The approval includes processing on farm emergency slaughtered animals. The food business operator had been subjected to the risk categorisation process described in SOP D25 of the local authority veterinary service documented procedures and was classified as medium- risk. From the records assessed during the audit, the official veterinarian completing official control documentation was not the veterinary practitioner who had deemed the animal fit for human consumption prior to on farm slaughter, thus avoiding a conflict of interest. Mayo Co. Council uses SOP A3 regarding official controls specific to the assessment of emergency slaughtered animals. S.I. No. 432 of 2009 ensures veterinary inspectors have legal powers to be able to accomplish their tasks regarding official controls. Reports in the form of a completed checklist were available for all animals assessed during the audit which had been presented for dressing following on farm emergency slaughter. These animals had also been sampled for antibiotics. The results of these samples were all satisfactory.

Declarations by the farmer who reared the animal stating identity and any medication administered were available for all animals. There was also a certificate signed by the veterinarian who conducted ante-mortem inspection, available for all animals assessed. Records were available that a special identification mark in the form of a diamond shaped stamp with the food business operator approval number was applied to boxed meat. Mayo Co. Council has placed a specific requirement on the food business operator that meat from animals dressed following on farm emergency slaughter must be returned to the owner of the animal for personal consumption. This ensures compliance with the specific requirement that such meat must remain on the domestic market.

3. INTRODUCTION

The FSAI is responsible for the enforcement of all food legislation in Ireland which is carried out through service contracts with official agencies. As part of its legal mandate, the FSAI is required to verify that the system of official controls is working effectively. For the purposes of assessing the delivery of official controls by Mayo Co. Council, this audit was carried out where acutely injured bovine animals which have been slaughtered on farm are presented to be dressed and cut for human consumption.

The audit consisted of an assessment of official controls in the offices of the local authority followed by a visit to one food business operator supervised by Mayo Co. Council, where acutely injured bovine animals which have been slaughtered on farm are presented to be dressed and cut for human consumption. The audit was undertaken as part of the planned FSAI programme of audits for 2012. The audit team was accompanied at all times during the onsite activities by representatives from the local authority.

The audit commenced with an assessment of compliance by authorised officers from the local authority with the requirements for official control and food legislation relevant to on farm emergency slaughter. The second part of the audit took place in an establishment with food business operator representatives and proceeded to determine their level of compliance with specific legislation relating to on farm emergency slaughter. This component focused on the documented procedures and related records contained in the food business operator's food safety management system. Closing meetings were held with the food business operator and Mayo Co. Council personnel to outline audit findings.

3.1. Audit Objective

The objective of the audit was to verify that effective and appropriate official controls were carried out with respect to food law by Mayo Co. Council in circumstances where an acutely injured bovine animal which had been slaughtered on farm and was subsequently presented to be dressed and cut for human consumption. The audit also assessed the food business operator's compliance with food law relating to this activity.

3.2. Audit Scope

The scope of the audit was limited to the assessment of compliance with official control and food legislation specific to on farm emergency slaughter.

3.3. Audit Criteria and Reference Documents

The principal audit criteria that will be referred to during the audit will be:

- [Food Safety Authority of Ireland Act, 1998](#) (S.I. No. 29 of 1998), as amended.
- [Service Contract between the FSAI and Mayo County Council](#)
- [Regulation \(EC\) No 178/2002](#) 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, as amended
- [Regulation \(EC\) No 852/2004](#) on the hygiene of foodstuffs, as amended
- [Regulation \(EC\) No 853/2004](#) laying down specific hygiene rules for food of animal origin, as amended - particularly, Annex III; Section I; Chapter VI
- [Regulation \(EC\) No 854/2004](#) laying down specific rules for the organisation of official controls on products of animal origin intended for human consumption, as amended – particularly, Annex I; Section I; Chapter II; point 4 & Section II; Chapter V; point 2
- S.I. No. 373 of 2009 – Abattoirs Act, 1988 (Veterinary Examination and Health Mark) (No. 2) Regulations, 2009;

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- Local Authority Veterinary Service SOP A3 – Revision 3. Emergency Slaughter On Farm
- Animal Welfare Guidelines for Managing Acutely Injured Livestock on Farm (developed by the Dept of Agriculture, Food and the Marine (DAFM) Farm Animal Welfare Advisory Council) (FAWAC guidelines)

3.4. Audit Methodology

This audit of official controls was undertaken using documented procedures which are included in the FSAI Quality Management System, namely the FSAI Audit Procedure. These procedures implement the FSAI audit obligations, defined in schedule 5 of the service contract between the FSAI and DAFM, and are in accordance with the requirements of Regulation (EC) No 882/2004 (including Article 6.1 of Commission Decision 2006/677/EC) and the FSAI Act.

An information note was developed on the audit and sent to Mayo Co. Council to provide relevant local authority staff with initial details of the audit. The evaluation plan was then developed which provided a more detailed overview of the audit, including audit scope, objectives, criteria and team. The evaluation plan also included the itinerary for onsite activity and confirmed that one food business operator would be visited.

4. AUDIT FINDINGS

4.1. Official Controls performed in accordance with Regulation (EC) No 882/2004

The food business operator visited was selected from data received from DAFM's National Beef Assurance Scheme (NBAS). The information received from NBAS is stored on the Animal Identification and Movement (AIM) database system. AIM is a generic database for multiple animal species and multiple movement types. AIM allows and records the movement of on farm emergency slaughtered animals to a slaughterhouse for dressing. Such animals are entered on the AIM system under a heading "Kill Home Market". Using an extract of information and figures on "Kill Home Market" the approved establishment to be visited as part of the audit was identified. Information on the movement of the on farm emergency slaughtered animals included:

- The holding it was moved from
- The slaughterhouse it was moved to
- The ear tag number of the bovine animal
- Date of slaughter

This information was used as the starting point in the food business operator visited to assess compliance with official controls and food law.

4.1.1 Approval

Article 3 of Regulation (EC) No 854/2004 states that the competent authorities shall approve establishments.

Mayo Co. Council has approved two food business operators to process acutely injured bovine animals which have been slaughtered on farm and are presented to be dressed and cut for human consumption.

4.1.2 Risk Categorisation

Article 3 of Regulation (EC) No 882/2004 states that official controls are carried out regularly, on a risk basis and with appropriate frequency, so as to achieve the objectives of this Regulation.

Mayo Co. Council uses SOP D25 to determine the risk categorisation of food business operators under the supervision of the local authority. The type of processes undertaken in an establishment and the nature and intended uses of its products determine to a large extent, the risk to public health from consumption of those products. These factors therefore primarily determine the level of risk associated with the establishment. Using the criteria set out in SOP D25, the risk category allocated to food business operations processing on farm emergency slaughtered animals is "Medium".

4.1.3 Conflict of Interest

Article 4 (2b) of Regulation 882/2004 states that staff carrying out official controls are free from any conflict of interest.

The Farm Animal Welfare Advisory Council guidelines for managing acutely injured livestock on farm requires that the veterinary practitioner who provides certification of an animal for emergency slaughter must, on no account, act as the ante- or post-mortem inspector of that animal at the slaughterhouse.

It is a requirement of Section 7.3 of SOP A3 that a private veterinary practitioner who provides certification of an animal for emergency slaughter must not conduct the post-mortem inspection of that animal at the slaughterhouse.

Records assessed by the audit team for animals which had been slaughtered on farm and presented in the food business operation visited for dressing, had in all cases, been signed by a private veterinary practitioner. This signature certified that such animals were fit for slaughter for human consumption. The audit team also verified that there was no conflict of interest regarding certification of on-farm emergency slaughter and post-mortem official controls.

4.1.4 Documented Procedures

Article 8 of Regulation 882/2004 states that competent authorities shall carry out official controls in accordance with documented procedures.

Mayo Co. Council uses documented SOPs relating to official controls in food business operations. SOP A3 has been developed to describe official controls specific to the "assessment of emergency slaughtered animals at local authority approved slaughterhouses". The FSAI's "Safetynet" is the location where all documented procedures relating to the work of the local authority veterinary service are stored.

Access to Safetynet is available online to Mayo Co. Council staff.

4.1.5 Staff Performing Official Controls (Training and Competence)

Article 6 of Regulation (EC) No 882/2004 states that the competent authority shall ensure that all of its staff performing official controls receive, for their area of competence, appropriate training enabling them to undertake their duties competently and to carry out official controls in a consistent manner.

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All Mayo Co. Council veterinary public health staff were familiar with the requirements of EU Regulations specific to on farm emergency slaughter. In addition, they had attended training conducted by DAFM on this subject in June, 2012.

4.1.6 Control and Verification Procedures

Article 4 of Regulation 882/2004 states that competent authorities shall have legal powers to carry out official controls.

DAFM has introduced S.I. No. 432 of 2009 to ensure all veterinary inspectors carrying out official controls have legal powers to be able to accomplish their tasks in general and in particular, to on farm emergency slaughter. Staff from Mayo Co Council are authorised under this legislation.

4.1.7 Reports

Article 9 of Regulation 882/2004 states that the competent authority shall draw up reports on the official controls that it has carried out.

Section 8 of SOP A3 details the records and reports to be maintained by Mayo Co. Council regarding official controls conducted. The audit team verified that the local authority had in place, an "On Farm Emergency Slaughter" file containing the following information:

- A list of all slaughterhouses under their supervision approved by the local authority veterinary inspectorate to accept emergency slaughter animals
- A current copy of Appendix A completed for each relevant slaughterhouse. Appendix A is a detailed check sheet for local authority food business operators where processing of on farm emergency slaughtered animals is carried out
- A record of the number of emergency on farm slaughtered animals that arrive at each slaughterhouse
- Documentation for each emergency slaughtered animal received at each slaughterhouse:
 - ER106 and food chain information
 - Veterinary Certificate/Ante-mortem Certificate
 - Owner declaration
 - On farm slaughter check sheet
 - Laboratory test results
 - Post-mortem certificate
 - Record of disposal of related animal by-product, as appropriate.

The audit team verified the presence of this information on the file of the food business operator selected for onsite verification.

4.1.8 Sampling and Analysis

Article 11 of Regulation 882/2004 and Annex 1, Section 1, Chapter 2 of Regulation 854/2004 states that the competent authorities sampling and analysis methods used in the context of official controls shall comply with relevant Community rules.

All animals assessed during the audit which had been presented for dressing following on farm emergency slaughter had been sampled for antibiotics. The results of these samples were all satisfactory.

4.2. Official Controls Performed in Food Establishments

Information contained on the AIM system of the National Beef Assurance Scheme indicated that the food business operator visited had taken in and dressed animals which had been slaughtered on farm.

The audit team was advised that a food safety management system based on HACCP principles, as required by Article 5 of Regulation (EC) No 852/2004, was in place in the food business operation visited. The current revision of the SOP describing procedures followed when an on farm emergency slaughtered animal is presented was not available to the audit team on the day the food business operation was visited¹.

Records retained as part of the food safety management system of the food business operator visited, verified that animals which had been slaughtered on farm had been entered on the AIM system as "Kill Home Market". Mayo Co. Council has placed a specific requirement on the food business operator that meat from animals dressed following on farm emergency slaughter must be returned to the owner of the animal for personal consumption. This ensures compliance with the specific requirement that such meat must remain on the domestic market.

The food business operator had put in place, documented procedures as part of their food safety management system describing how bovine and ovine carcasses are identified and traceable. For the animals assessed as part of the audit, it was verified that traceability, as required by Article 18 of Regulation 178/2002, could be established from the animal's ear tag to a carcass number or boxed meat. The diamond identification mark on the label attached to the boxed meat at the time of the audit was generated in biro². To ensure a more robust system of labelling, a pre-printed label with the diamond identification mark is required.

5. CONCLUSIONS

Mayo Co Council has in place, a system of official controls for assessing on farm emergency slaughtered bovine animals. Official controls assessed during this audit were being implemented effectively. Records and associated documentation relating to on-farm emergency slaughter were organised and well maintained. Documented procedures were being followed. The audit team noted during the visit to the food business operator that the paperwork required for each animal was present. A satisfactory level of compliance with official control and food legislation was in place. Two minor corrective actions were required on the part of the food business operator, as detailed in the attached Corrective Action Plan which at the time of completing the audit report, had been closed out.

¹ Subsequent to the audit, Mayo Co. Council forwarded to the FSAI, a copy of the revised food business operator SOP (Procedures for the slaughter of emergency animals).

² Attached to the SOP (Procedures for the slaughter of emergency animals) referred to above is a revised format of printed labels in the diamond shaped identification mark required for meat from emergency slaughtered animals.



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