

AUDIT  
REPORT

Official Controls Audit  
of Sheep Identification,  
Acceptance and Traceability  
within Slaughter Plants

Department of Agriculture,  
Food and the Marine (DAFM)  
Veterinary Public Health  
Inspection Service (VPHIS)

MAY 2018

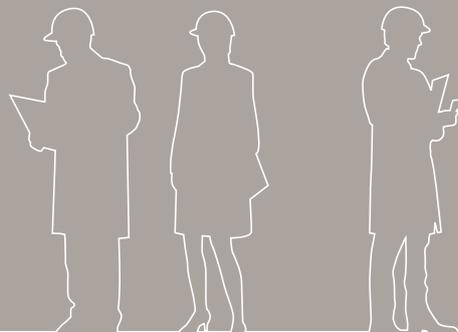


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## 1. GLOSSARY

AIM	Animal Identification and Movement System
CA	competent authority
DAFM	Department of Agriculture, Food and the Marine
FSAI	Food Safety Authority of Ireland
HACCP	hazard analysis and critical control point
NSIS	National Sheep Identification System
RSVI	Regional Superintending Veterinary Inspector
SOP	standard operating procedure
SVI	Superintending Veterinary Inspector
VI	Veterinary Inspector
VPHIS	Veterinary Public Health Inspection Service
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; this 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 in the official agencies, the FSAI conducts an annual programme of audits.

The FSAI completed an audit of the food safety official controls performed by the Department of Agriculture Food and the Marine (DAFM) Veterinary Public Health Inspection Service (VPHIS) at sheep slaughter establishments. The audit was undertaken as part of the planned programme of audits carried out by the FSAI in 2017 to determine the level of compliance with European legislation and conformance with the service contract in place between the DAFM and the FSAI.

The audit covered the organisation, planning, implementation and review of official controls within the VPHIS of the DAFM at national and regional levels in order to confirm compliance with legal requirements and the DAFM's own documented procedures, mainly Veterinary Procedural Notices (VPNs) and standard operating procedures (SOPs). The scope of the audit was to examine the identification, acceptance and traceability of sheep and sheep meat within slaughter establishments. As part of this audit, compliance with the National Sheep Identification System in selected sheep slaughter establishments was assessed.

Overall, the audit concluded that there is an organised approach to the official controls carried out by the VPHIS at the intake of livestock in sheep slaughter establishments, but that there is a need for more streamlined documented procedures. Ongoing non-compliances with the National Sheep Identification System (NSIS) – such as illegible, incomplete or inaccurate dispatch documents and untagged sheep entering the slaughter hall – are seen by the DAFM and the food business operators as an inevitable consequence of the weaknesses of the National Sheep Identification System (NSIS) and are not recorded as non-compliances. There are no checks carried out by food business operators or the Veterinary Inspector (VI) at plant level on the accuracy or validity of the tag numbers recorded on the dispatch documents. All of the VIs interviewed by the audit team acknowledged the difficulties and potential for error with the current system and that the routine official controls were not prioritising the validation of information on a system that was recognised as flawed.

Tag numbers on dispatch documents randomly chosen from each establishment were subsequently checked by the audit team to verify their authenticity. A significant number of tag numbers/identities selected were not valid. The system is reliant on a high level of manual entry by farmers, dealers and slaughterhouse personnel. The electronic identity system in place for sheep from Northern Ireland was seen in three establishments; this system involved less manual entry and therefore less potential for errors to occur.

An intake SOP was in place as part of the food business operator's Food Safety Management System (FSMS) in all establishments audited. However, in two of the five establishments, the SOP did not require factory personnel to check all incoming sheep for an ear tag before the animals were accepted by the food business operator for slaughter. In addition, at these two plants the separation between acceptance of animals by the food business operator and presentation to the Temporary Veterinary Inspector (TVI) for *ante mortem* examination were not clear.

The deficiencies in the NSIS predominately relate to the delivery of consignments via dealers. When a dealer delivers sheep sourced from a number of different holdings the dealer summarises the information from the different holdings on one dispatch document containing the dealer designator number. In such situations, traceability can be difficult, as the dealer transcribes and summarises tag numbers from a number of flocks onto a new dispatch docket, and the food business operator then uses this dealer's designator number – and not the designator number of the farm of origin – in order to trace the sheep.

The audit team was advised that in one of the slaughter establishments audited, 0.9% of sheep presented in the slaughter hall, after stunning and bleeding, did not have a tag and 1.8% of sheep supplied by dealers had no tags. In another establishment, between 0.5% and 0.8% of sheep did not have tags when presented in the slaughter hall.

The purpose of the NSIS is to enable sheep and sheep meat to be traced back to the farm of origin. The serious deficiencies identified during the audit relating to the acceptance, identification and traceability of sheep result in significant numbers of sheep that are not traceable to their farm of origin.

### 3. INTRODUCTION

The FSAI is responsible for the enforcement of food legislation in Ireland. The FSAI carries out this enforcement function through service contracts with official agencies. These service contracts outline an agreed level and standard of food safety activity that the official agencies perform as agents of the FSAI. The DAFM has entered into a service contract with the FSAI, which is responsible for enforcing food legislation in large-scale meat and milk food manufacturers in Ireland; the FSAI is also responsible for enforcing other official control activities. It is a requirement of the service contract and food legislation that the DAFM ensures that official controls are carried out regularly, on a risk basis and with the appropriate frequency. The audit was undertaken as part of the planned programme of audits of official controls undertaken by the FSAI in 2017.

#### 3.1 Audit objective

As part of its legal mandate, and in accordance with Schedule 5 of the service contract, the FSAI is required to verify that the systems of official controls put in place by the official agencies are working effectively. This audit was carried out to (i) verify the efficacy of official controls, in particular in relation to identification, acceptance and traceability of sheep and sheep meat within slaughter establishments; (ii) assess compliance by the VPHIS with relevant official controls legislation, adherence to the terms and requirements of the FSAI service contract, as well as conformance with relevant documented procedures; and (iii) examine the effectiveness of the National Sheep Identification System (NSIS). The audit was carried out at VPHIS national level in three of the six VPHIS regions and in five sheep slaughter establishments.

#### 3.2 Audit scope

The audit covered the organisation, planning, implementation and review of official controls within the DAFM VPHIS at national and regional levels, in order to confirm compliance with the requirements of the FSAI Service Contract, Regulation (EC) No 882/2004, the National Control Plan for Ireland 2012–2016 and the DAFM's own documented procedures, mainly Veterinary Procedural Notices (VPNs) and standard operating procedures (SOPs). As part of this audit, compliance with the NSIS in selected sheep slaughter establishments was also assessed.

## 3.3 Audit criteria and reference documents

The audit criteria referred to during the audit included:

- [Regulation \(EC\) No 882/2004](#) on official controls performed to ensure verification of compliance with feed and food law, animal health and animal welfare rules, 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
- [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
- Regulation 21/2004 establishing a system for identification and registration of ovine and caprine animals
- Commission Decision 2006/968 implementing Council regulation 21/2004 guidelines and procedure for electronic identification of ovine and caprine animals
- Commission Regulation 1505/2006 implementing Council Regulation (EC) No 21/2004 as regards the minimum level of checks to be carried out in relation to the identification and registration of ovine and caprine animals
- Council Directive 96/93 on the certification of animals and animal products.

## 3.4 Audit methodology

This audit of official controls was undertaken using the audit procedures documented in the FSAI's Quality Management System. These procedures implement the FSAI's audit obligations, defined in Schedule 5 of the service contract between the FSAI and the DAFM, and in accordance with the requirements of Regulation (EC) No 882/2004, Commission Decision 2006/677/EC, and Section 48(9) of the Food Safety Authority of Ireland Act 1998, as amended.

Before the audit, an evaluation plan describing the audit process and approach (including the scope, objectives, criteria and the audit team) was sent to the DAFM. The audit began with a meeting attended by representatives from the VPHIS, Meat, Milk Hygiene and Animal By-Products Division and the Animal Identification and Movement (AIM) Division. The audit team looked for evidence at a national level that the National Sheep Identification System is implemented consistently and effectively, and how VPHIS and food business operators adhere to documented procedures.

The auditors met with the Regional Superintending Veterinary Inspector (RSVI) and the VI in three regions to review documented procedures and also to inspect the files and inspection reports for the sheep slaughter establishments being audited.

The audit team then audited the sheep intake, hazard analysis and critical control point (HACCP) and traceability systems in each slaughter establishment, to assess the adequacy and performance of the official controls put in place at establishment level, and to assess the compliance with food law by the food business operator.

On completion of the on-site visits to slaughter establishments, the audit findings relevant to each food business operator were outlined by the FSAI audit team. A final meeting was held with relevant DAFM personnel; at this meeting, all findings were discussed.

## 4. AUDIT FINDINGS

### 4.1 Official controls performed in accordance with Regulation (EC) No 882/2004

#### 4.1.1 Organisation and structure of official controls

**Article 4 of Regulation (EC) No 882/2004 requires Member States to designate the competent authorities responsible for the purposes of the official controls set out in the Regulation. It also lays down operational criteria for the competent authorities.**

#### Findings

The VPHIS provides a range of food safety/food control services in accordance with the service contract between the FSAI and the DAFM. These services include inspection of food businesses and food sampling to ensure compliance with food legislation, the management of food incidents and a range of compliance building/education measures for food businesses. The VPHIS operates regionally under the supervision of a Regional Superintending Veterinary Inspector (RSVI). The RSVI organises the inspection of food establishments in his/her local region. The VPHIS is organised into six regions and is staffed by Veterinary Inspectors (VIs) and technical staff. Temporary VIs have been recruited on a contract basis to replace VIs, but their duties are significantly more restrictive than those of a VI. Technical staff support the supervision and regulatory work carried out by VIs in food establishments.

In general, the organisation of official controls in slaughter establishments is guided by SOP Food Safety Management System 006/2008 rev03 (06/14) (for establishment attached to slaughterhouses).

#### 4.1.2 Prioritisation of official controls and risk categorisation

**Article 3 of Regulation (EC) No 882/2004 requires that official controls are carried out regularly, on a risk basis and with appropriate frequency. In doing so, account must be taken of identified risks that may influence food safety, past records of food business operator compliance, the reliability of own checks and any additional information on non-compliance. Controls shall in general be carried out without prior warning.**

#### Findings

Risk-based priorities for official controls are planned in order to meet the requirements of SOP 6. Establishments are risk assessed by the VI each year for activities other than slaughter; this risk assessment process is carried out using a RAVI form. Four of the five establishments received a Level 1 score, which equates to one VI check being completed every six weeks. In addition, a separate risk assessment is carried out by the Superintending Veterinary Inspector (SVI) using the RA SVI form to determine his/her level of audits at the establishment. On the last SVI risk assessment, the establishments audited had either a Level 1 (annual) or Level 2 (once every six months) frequency of inspection. The results of the most recent assessments are shown in Table 1.<sup>1</sup>

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<sup>1</sup> DAFM comment: All the sheep plants audited by the FSAI during the audit have a Level 1 score, as the risk assessment form categorises all plants as Level 1, and all FBOs were given this score. Procedures are being reviewed to ensure that the score level is recorded accurately in the future.

Table 1: Official controls risk assessment

	FBO 1	FBO 2	FBO 3	FBO 4	FBO 5
<b>Risk assessment VI checks</b>	24/01/2017 Risk score 7 (Level 1)	No RAVI available	16/01/2017 Risk score 11 (Level 1)	27/02/2017 Risk score 7 (Level 1)	21/01/2016 Risk score 10 (Level 1)
<b>Risk assessment form SVI Slaughter</b>	27/01/2016 Risk score 9 (Level 1)	19/01/2016 Risk score 10 (Level 1)	18/01/2017 Risk score 13 (Level 2)	28/02/2017 Risk score 6 (Level 1)	10/02/2016 Risk score 11 (Level 1)
<b>SVI audit</b>	25/11/2016 SVI audit of veterinary controls and records  14/09/16 SVI audit report	18/08/2016 SVI audit form	03/05/2017 SVI visit report	19/10/2016 SVI audit of veterinary controls and records	Not Available – change in SVI in 2017

#### 4.1.3 Documented procedures

**Article 8 of Regulation (EC) No 882/2004 requires that competent authorities carry out their official controls in accordance with documented procedures containing information and instructions for staff performing official controls.**

#### Findings

The VPHIS has a significant number of procedures and templates in place for VIs and technical staff to complete when carrying out official controls. For the purposes of this audit, official controls were organised by a series of documented procedures which set down how the DAFM official controls monitor the identification, acceptance and traceability of sheep and ovine products within slaughter establishments. The main procedures are:

- SOP 10 /2010 – OC in ovine slaughter prior to and including slaughter
- VPN 6 /2012 – Sheep intake
- VPN 5 /2017 – CLP in ovine
- VPN 13 /2016 – Carcase hygiene enforcement
- VPN 3 /2016 – Completion of OCR1
- SOP6 /2008 – OC of FSMS

**Official controls in DAFM-supervised ovine slaughter establishments prior to and including slaughter – Ref SOP 010/2010**

#### Findings

Often, identification and traceability issues arise before sheep are presented for slaughter. Such issues include

missing tags or incomplete dispatch documents. The audit team was advised that food business operators address these issues by obtaining a new identity for the animal or by rewriting the dispatch document and then presenting animals to the TVI (Temporary Veterinary Inspector). No checks are carried out by the FBO or the VI at plant level to verify the accuracy or validity of the information on the dispatch documents. All of the VIs interviewed by the audit team acknowledged the difficulties and potential for error with the current system and that the routine official controls were not prioritising the validation of information on a system that was recognised as flawed.

In two slaughter establishments, traceability exercises conducted by the VIs identified non-compliances with the traceability system in place for sheep. Corrective action was taken by the DAFM; however, the food business operator controls and the manual entry of data onto the NSIS cannot prevent these non-compliances from reoccurring.

Variations in the system of controls operated by the VI and the technical staff were observed by the audit team. Forms were used inconsistently, e.g. AME forms were used daily in some establishments and in other establishments they were used if an animal was found dead in a lairage. In one food business, it is only used when a sheep was condemned on the slaughter line. Lairage day books are completed in some establishments and not in others. Condemnation certs are used for non-compliances with food chain information requirements in one establishment audited.

The SOP requires that TSE/residue samples are only taken where an ear tag is readable. If the animal selected for sampling has an illegible or incomplete tag number, the sampling officer is required to select another animal for sampling. This might reduce the effectiveness of the sampling. This sampling restriction outlined in the SOP is an acknowledgement of the weakness in the NSIS.

The SOP specifies that activity is to be suspended by the DAFM when carcasses without NSIS ear tags are found in a slaughter hall, or where tag numbers do not correspond with the dispatch document. These instructions are not applied by the DAFM in the establishments audited.

### ***VPN 3/2016 – Completion of Operational Check Reports (OCR 1)***

#### **Findings**

Evidence of completed Operational Check Reports (OCR 1) forms was found in all food business operators.

### ***VPN 6/2012 – Sheep intake at slaughter establishments***

#### **Findings**

The percentage of animals' tags to be checked by the food business operator and the VI against dispatch document are prescribed in detail in the SOP, with elevated percentages of animals to be checked in the event of non-compliances. In practice a number of sheep from each load are checked by the food business operator and/or the VI. The percentages of animals detailed in the VPN were not recorded in any of the establishments audited.

#### **Carcase labels**

When the animal is slaughtered and dressed, the label applied to the carcass must include a link to the flock number of the supplier. The food business operator must also have in place an SOP which will allow any carcass chosen for residue sampling to be linked to the flock of birth of the animal from which the carcass derives. This was not the case in one establishment audited.

### **VPN 13/2016 – Carcase hygiene enforcement strategy for sheep and VPN 5/2017 – Clean Livestock Policy in ovines**

#### **Findings**

At the time of the audit, the Clean Livestock Policy was relatively new. Although at different stages of application, evidence of implementation of the policy was noted in all establishments.

#### **Verifying AIMS SOP 10/2010**

#### **Findings**

DAFM staff must ensure that all relevant information that is entered on the Animal Identification and Movement (AIM) system is valid; this is achieved by carrying out a verification check on all sheep movement recorded on VCSM Rev01. In addition, the DAFM conducts a national census annually of sheep holdings and flock registers, and tags are verified by DAFM staff during cross-compliance checks. In 2012, a desktop review was conducted of the private tag companies which the DAFM has approved to supply sheep tags. The review showed that approximately 120 different types of tags were in operation and were of varying quality, e.g. featuring very small typeface and poor print quality, thus making them difficult to read.

#### **4.1.4 Staff performing official controls**

**Article 4 (2) of Regulation (EC) No 882/2004 requires the competent authority to ensure that a sufficient number of suitably qualified and experienced staff, so that official controls and control duties can be carried out efficiently and effectively that appropriate and properly maintained facilities and equipment are available, and that staff performing controls are free of any conflict of interest.**

#### **Findings**

Training in local areas is dependent on a national training plan, which is developed annually. Staff interviewed during the audit were knowledgeable about the requirements of the National Sheep Identification System, as well as relevant legislation requirements and DAFM documented procedures.

Conflict of interest forms are signed by the VIs each year. Conflict of interest forms were seen for VIs of four of the five plants. The TVIs do not sign a conflict of interest form, but they are expected to notify the VI if they have a conflict of interest and he/she must take the appropriate action.

### 4.1.5 Identification, follow-up and closeout of non-compliances

**Article 54 of Regulation (EC) No 882/2004 requires that when the competent authority identifies non-compliance it shall ensure that the operator remedies the situation. When deciding which action to take, the competent authority shall take account of the nature of the non-compliance and that operator's past record with regard to non-compliance.**

**Article 8.3 (b) of Regulation (EC) No 882/2004 requires that competent authorities shall have procedures in place to ensure that corrective action is taken when needed**

#### **Findings**

Non-compliances identified by VIs during traceability exercises are followed up by the VI, and corrective action is taken. Ongoing non-compliances with the NSIS, such as illegible, incomplete or inaccurate dispatch documents and untagged sheep entering the slaughter hall, are seen by the DAFM and the food business operators as an inevitable consequence of the weaknesses of the NSIS. For this reason, they are not recorded as non-compliances.

### 4.1.6 Verification and review of official controls

**Article 4(4) of Regulation (EC) No 882/2004 requires the competent authorities to ensure the impartiality, consistency and quality of official controls at all levels, and to guarantee the effectiveness and appropriateness of official controls.**

**Article 4(6) of the Regulation requires the competent authorities to carry out internal audits or have external audits carried out. These must be subject to independent scrutiny and carried out in a transparent manner.**

**Article 8(3) states that the competent authorities must have procedures in place to verify the effectiveness of official controls and to ensure that corrective action is taken when needed, and to update documentation as appropriate.**

#### **Findings**

At regional VPHIS meetings, official controls are discussed among the VIs and the RSVI. Also at these meeting a review of VI inspections and files is carried out. The RSVIs are familiar with issues in establishments locally. The new 'SVI Audit of Veterinary Controls and Records' checklists are comprehensive aide memoires which will enable the RSVI to perform a full review of official controls carried out by VIs in each food business operator establishment. These forms will facilitate the review of the effectiveness of official controls at local level; however, at the time of audit these forms were relatively new and completion of the forms was not being implemented in all slaughter establishments. Moreover, they are not yet part of the national SOPs and VPNs system.

Different systems to verify the effectiveness of official controls were in place in each region. In each of the regions audited, the RSVI had conducted desk-based audits or on-site supervisory audits to verify that official controls were being carried out consistently, and in line with SOPs. A number of joint inspections also took place; as part of this process, RSVIs accompanied VIs on difficult inspections, approval inspections, etc. Evidence of joint inspections was observed on the files reviewed. Different forms were used to document these supervisory audits.

## 4.2 Food business operator findings

### 4.2.1 Identification of sheep

#### **Legal basis**

**Regulation 21/2004 Recital 12:** *In order to permit movements of ovine and caprine animals to be traced, animals should be identified properly and all their movements should be traceable.*

**Regulation 21/2004 Article 1 .1** *requires each Member State to establish a system for the identification and registration of ovine and caprine animals in accordance with the provisions of this Regulation.*

**Regulation 21/2004 Article 3 .1:** *The system for the identification and registration of animals shall comprise the following elements: (a) means of identification to identify each animal; (b) up-to-date registers kept on each holding; (c) movement documents; (d) a central register or a computer database.*

**Regulation 21/2004 Annex** *sets down the details of the means of identification of the sheep, holding register, the movement document and the computer database.*

**S.I. 309/2011 European Communities (Sheep Identification) Regulations 2011** *established an identification system for sheep for Ireland. The system known as the “National Sheep Identification System” or “NSIS”.*

#### **NSIS requirements**

**The current NSIS is based on one identity for life. The first tag number a lamb receives in its lifetime at the holding of origin will be the number recorded on all documentation for all movements throughout its life except:**

- **When tags are lost**
- **Where lambs are upgraded to electronic identification (EID) status, as they are being retained for breeding or live export**

**All sheep must be tagged before reaching nine months of age or on leaving the holding – whichever is the earliest. Re-tagging with a new ID is only permitted in certain circumstances.**

**Official personalised NSIS dispatch/movement documents must accompany all movements of sheep onto and off farm holdings. For movements to marts and slaughterhouses, the movements are notified to the AIM by the mart operator or food business operator. When sheep are purchased onto a farm from another farm the farmer must notify the local DAFM office – which records this on the AIM.**

**All documents must be completed accurately on the current version of the NSIS dispatch document. Inaccurate completion of dispatch documents can lead to penalties as a result of cross-compliance inspections.**

#### **Findings**

In all of the establishments audited the audit team found examples of dispatch documents that were incomplete, inaccurate and that also featured illegible identification numbers. Tag numbers on dispatch documents randomly chosen from each establishment were subsequently checked via the AIM in order to verify their authenticity. A significant number of tag numbers/identities selected were not valid. Some of the numbers checked had not been

issued by the AIM system and other numbers were aligned to the incorrect designator number. The system is reliant on a high level of manual entry by farmers, dealers and slaughterhouse personnel. The electronic identity system in place for sheep from Northern Ireland was observed in three establishments and involved less manual entry and therefore less room for error.

Dispatch documents seen in one slaughterhouse were completed with a mart name and address of destination instead of the name and address of the slaughterhouse to which the sheep were delivered. The audit team was informed that this was for commercial reasons.<sup>2</sup>

### 4.2.2 Acceptance into slaughterhouses

#### Legal basis

**Regulation (EC) 853/2004, as amended, Annex II, Section II, 2a requires that the slaughter plant food business operator must have procedures in place which guarantee that each animal or, where appropriate, each lot of animals accepted onto the slaughterhouse premises is properly identified. In order to meet this requirement, the food business operator must ensure that each sheep is tagged as detailed in Regulation (EC) 21/2004 (establishing a system for the identification and registration of ovine and caprine animals, and implementing Statutory Instruments (SI 281/2009 and 309/2011).**

**Chapter II, Section II, Annex I of Regulation (EC) No 854/2004 requires the official veterinarian to verify that animals were not slaughtered until the slaughterhouse operator had been provided with and checked food chain information (FCI).**

#### DAFM documented procedures

**The food business operator must have in place an SOP which details the checks it carries out in order to determine the compliance of the incoming sheep with the relevant legislation, as set out below.**

**Each consignment of sheep presented at a slaughter plant must be accompanied by a “National Sheep Identification System Sheep Dispatch/Movement Document and Food Chain Information”.**

**The representative of the slaughter plant must carry out a series of checks on every consignment of sheep accepted for slaughter.**

**Such checks include a check of at least 5% of the sheep tags against the tag numbers recorded on the dispatch document for each consignment over 100 sheep, and a minimum number of five tags to be checked per consignment of between 30 and 100 sheep. At least one tag number should be checked in any consignment of less than 30 sheep. Each tag number checked must be initialled by the slaughterhouse representative on the dispatch/FCI document.**

**Any sheep bearing a tag number that is not accurately recorded on the dispatch document is deemed not to have accurate food chain information and cannot be considered fit for slaughter for human consumption. These sheep must be detained alive until a properly completed dispatch/FCI document has**

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<sup>2</sup> DAFM comment: Once the batch remains the same, the DAFM allows that batch of sheep coming from a mart directly to a slaughterhouse to use the same dispatch document that allowed the sheep to travel to the mart. However, it should be noted that the movement will be recorded on the AIM at the slaughter premises as required by EU Regulation 21/2004.

*been received for them. Alternatively, and if the official veterinarian so permits, the sheep may be slaughtered and their carcasses detained until a properly completed dispatch/FCI document has been received.*

*If the FCI is not available within 24 hours, all meat from the animal is to be declared unfit for human consumption.*

*If one or more discrepancies are found between tag numbers and dispatch/FCI document records, 20% of all of the sheep in the consignment must have their tag numbers checked against the dispatch/FCI document record. If further discrepancies are identified, then all of the sheep in the consignment must have their tag numbers checked against the dispatch/FCI document record.*

*Once satisfied that all parts of the form have been completed satisfactorily by the supplier and the haulier, the food business operator must complete the relevant part of the FCI form ("Slaughter Plant Declaration") indicating such. In addition, the food business operator must give the fully completed form to the Official Veterinarian (OV) who can carry out an ante-mortem examination on the animals in the consignment. The food business operator must have in place an SOP which details the checks it carries out in order to determine the compliance of the incoming sheep with the relevant legislation. The OV must check that this SOP is in place and is sufficiently comprehensive.*

#### **Findings**

SOPs were in place at each food business operator as part of the food business operator's FSMS. In addition, completed dispatch documents were available for all loads delivered.

An intake SOP was in place as part of the food business operator's FSMS in all establishments. In two of the five establishments, the SOPs did not require factory personnel to check all incoming sheep for the presence of an ear tag before the animals were accepted by the food business operator for slaughter. In addition, at these two plants the separation between acceptance of animals by the food business operator and presentation to the TVI for *ante mortem* examination was not clear.

Completed dispatch documents were available for all loads delivered. One dispatch document seen in a lairage was an old version which did not include food chain information. This issue was not identified by the food business operator; the animals were accepted by the food business operator for slaughter and passed the *ante mortem* examination.

The audit team was informed that if a tag is missing when a farmer/dealer presents animals at a lairage a new tag is inserted by the supplier. If two sheep on a mixed consignment (i.e. from different holdings) are missing tags, it may not be possible for the farmer/dealer to identify the correct farm of origin.

#### **4.2.3 Hygiene requirements**

##### **Regulation 853/2004 ANNEX III SPECIFIC REQUIREMENTS SECTION I: MEAT OF DOMESTIC UNGULATES**

**1. (a) Slaughterhouses must have adequate and hygienic lairage facilities or, climate permitting, waiting pens that are easy to clean and disinfect. These facilities must be equipped for watering the animals and, if necessary, feeding them. The drainage of the wastewater must not compromise food safety.**

**(b) They must also have separate lockable facilities or, climate permitting, pens for sick or suspect animals, with separate draining, and sited in such a way as to avoid contamination of other animals, unless the competent authority considers that such facilities are unnecessary.**

**2. To avoid contaminating meat, they must:**

**(e) have slaughter lines (where operated) that are designed to allow constant progress of the slaughter process and to avoid cross-contamination between the different parts of the slaughter line. Where more than one slaughter line is operated in the same premises, there must be adequate separation of the lines to prevent cross-contamination.**

**DAFM documented procedures (SOP 10/2010)**

**The food business operator shall have a SOP for all of its operations, including:**

- **an ante mortem SOP**

**It is the responsibility of the food business operator to present clean sheep for ante mortem inspections**

**The food business operator must ensure that HACCP-based intake procedures at intake to a slaughterhouse guarantee that each animal or lot of animals accepted into the slaughterhouse is:**

- **Properly identified**
- **Accompanied by dispatch documents**
- **Does not come from a restricted holding**
- **Is clean and healthy**

**Staff must be trained and the food business operator shall provide the VI with auditable documents in order to verify compliance with its HACCP-based procedures**

**The food business operator must provide adequate cleaning and disinfectant facilities**

## **Findings**

In general, lairages were adequate structurally and ventilated – remodelling of lines to allow for better clipping areas was taking place in one establishment at the time of the audit. In-rolling of fleece in the shoulder region was noted on a number of carcasses being dressed on the slaughter line at one establishment.<sup>3</sup> Roll-out of the Clean Livestock Policy (CLP) for sheep was underway in all establishments at the time of the audit.

### **4.2.4 Traceability requirements**

**In order to meet the traceability requirements of Regulation (EC) No 178/2002, the food business operator must, at a minimum, be able to link the carcass number to the flock number of the supplier.**

**In order to meet the requirements of S.I.183 of 2009 in relation to residues in meat, the food business operator must have a system in place which will allow any carcass sampled for the presence of residues to be linked to the flock of birth of the animal from which that carcass derived.**

**Diseases of Animals Act, 1966 (National Sheep Identification System) Order, 2001 [S.I. No. 281 of 2001] requires live sheep identification to be correlated to the subsequent carcass number assigned by a slaughter plant.**

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<sup>3</sup> This was addressed by the DAFM and the food business operator on the day of the audit.

**DAFM documented procedures (VPN 6/2012)**

**Carcase labels (for sheep)**

**When slaughtered and dressed, the label applied to the carcase must include at a minimum a link to the flock number of the supplier**

**The food business operator must also have in place his own SOP, which will allow any carcase chosen for residue sampling to be linked to the flock of birth of the animal from which the carcase derives.**

**Records which must be maintained by the food business operator:**

- 1. A flock register which records the identities of all sheep accepted into the slaughterhouse for slaughter.**
- 2. The number of sheep accepted for slaughter must be entered into the AIM database**

**Findings**

Although a small number of traceability checks were successfully carried out by the audit team on carcasses in the chills in the establishments audited, the audit team found a significant number of deficiencies and potential deficiencies in the system.

A significant number of ear tag numbers recorded on dispatch documents which had accompanied animals for slaughter were found to be invalid when checked against the AIM database.

The deficiencies predominately relate to the delivery of consignments via dealers – when a dealer is delivering sheep from a number of different holdings and includes the information on one dispatch document traceability can be difficult, as it is the dealer's designator number (and not the designator number of the farm of origin) that the food business operator uses in order to trace sheep.

Traceability is further challenged if tags are missing from a consignment and a dealer has used its own tags. In one of the slaughter establishments audited, 0.9% of sheep presented in the slaughter hall did not have a tag and 1.8% of sheep supplied by dealers had no tags. In another establishment between 0.5% and 0.8% of sheep did not have tags when presented in the slaughter hall.

In one of the establishments, discrepancies around the number of sheep per consignment arose during the audit. Details of 13 sheep were entered onto the IT system in the lairage owned by a particular supplier, whereas 14 sheep were presented in the slaughter hall. In a second instance, 11 sheep were entered on the IT lairage system, whereas 12 sheep were presented in the slaughter hall.

In another establishment, there was no flock register available.

## 5. AUDIT FINDINGS REQUIRING CORRECTIVE ACTION

Audit findings requiring corrective action are listed in the corrective action plan. The findings identified during this audit should be disseminated nationally, in order to ensure that corrective actions and opportunities for improvement identified are implemented across regions if relevant.

## 6. CONCLUSION

The audit team identified many examples of practices that did not comply with the legal requirements and with the DAFM documented procedures. Significant deficiencies relating to the acceptance, identification and traceability of sheep, and the labelling of sheep meat were identified; in particular, the traceability of sheep supplied to slaughterhouses via dealers or third parties is of particular concern.





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