

AUDIT  
REPORT

Audit of Official Controls  
carried out by the Local  
Authority Veterinary Service  
– Cavan County Council

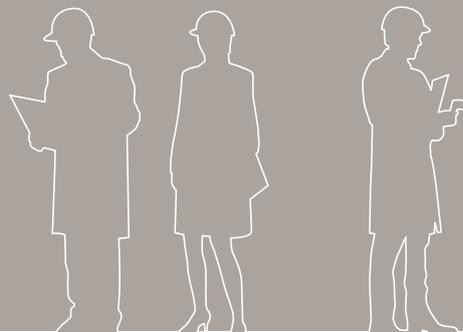
NOVEMBER 2015



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## **1. GLOSSARY**

CCP	Critical Control Point
FSAI	Food Safety Authority of Ireland
HACCP	Hazard Analysis Critical Control Point
OAPI	Official Agency Premises Inspection database
SOP	Standard Operating Procedure

## **2. EXECUTIVE SUMMARY**

This report describes the outcome of an audit carried out by the Food Safety Authority of Ireland (FSAI) in Cavan County Council from 16-18 September, 2014. The objective of this audit was to verify (i) the efficacy of official controls and (ii) compliance with official food control legislation and the agencies own procedures and plans.

Overall, the report concludes that although official controls take place regularly in food establishments, a structured and organised approach for the prioritisation, planning, co-ordination and delivery of official controls is not in place. The official controls in Cavan County Council are not always effective at identifying and closing out non-compliances in food businesses under its supervision. Following the audit, the county veterinary officer issued a Compliance Notice on one of the establishments audited to address the significant non-compliances identified on the day of the audit.

Significant findings have been identified during the audit in relation to the organisation and implementation of food safety controls and these include:

- Inspections are carried out regularly. However, this is not risk-based. There is no documented planned official control programme in place
- Documented procedures prescribed by the local authority veterinary service are rarely used. There was limited documented evidence of official controls in non-hygiene areas such as labelling, food contact materials etc
- Inspection reports are generally issued to food business operators following an inspection. However, on occasion, instructions to food business operators were unclear and data fields on forms were not completed. Also, there were differences between the list of inspections recorded on the Official Agency Premises Inspection (OAPI) database used by the local authorities and the inspection reports on the hard copy file
- Official controls did not identify a number of the non-compliances identified by the audit team during on-site activities including:
  - Hazard Analysis Critical Control Point (HACCP) non-compliances in both premises
  - Traceability records in the slaughterhouse
- There is no evidence of any review of the effectiveness of official controls, e.g. there was no system in place to review the approval of establishments or the risk rating of establishments

Corrective actions to the findings of this report are required to ensure the effectiveness of official controls and to enhance the consistency of the service in line with other local authorities. This is important to ensure that all food business operators under the supervision of a local authority veterinary service are subject to the same rules.

### **3. INTRODUCTION**

#### **3.1 Audit Objective**

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. Cavan County Council has entered into a service contract with the FSAI and is responsible for the enforcement of food legislation as it applies to low throughput slaughterhouses, meat plants and cold stores in the county. It is a requirement of the service contract and food legislation that the council ensures official controls are carried out regularly, on a risk-basis and with the appropriate frequency.

As part of its legal mandate, and in accordance with Schedule 5 of the service contract, the FSAI is required to verify that the system of official controls is working effectively. This audit was carried out for the purposes of assessing the effectiveness and appropriateness of the delivery of official controls by the council. Compliance by the veterinary staff with relevant food legislation, adherence to the terms and requirements of the FSAI Service Contract, as well as conformance with relevant documented procedures, were assessed.

This audit was undertaken as part of the FSAI's audit programme for 2014. This report describes the audit objective, scope, methodology and the findings of the audit.

#### **3.2 Audit Scope**

The audit covered the organisation, planning, implementation and review of official controls within the council in order to confirm compliance with the requirements of the FSAI Service Contract, Regulation (EC) No 882/2004 and the Multi-Annual National Control Plan.

#### **3.3 Audit Criteria and Reference Documents**

The audit criteria referred to during the audit included the following:

- 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
- The FSAI Service Contract (including the FSAI Act)
- Regulation (EC) No 852/2004 on the hygiene of foodstuffs, as amended
- Regulation (EC) No 2073/2005 on microbiological criteria for foodstuffs
- European Communities (Food and Feed Hygiene) Regulations, 2009 (S.I. No. 432 of 2009) as amended
- 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
- The National Control Plan for Ireland 2012-2016
- Local authority hygiene plans and data supplied to the FSAI
- Local authority veterinary service documented procedures
- Local procedures

### **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 Cavan County Council and in accordance with the requirements of Regulation (EC) No 882/2004 (including Article 6.1 of Commission Decision 2006/677/EC) and also the FSAI Act.

An evaluation plan describing the audit process and approach (including the scope, objectives, criteria and the audit team) was sent to the local authority ahead of the on-site activities. As part of the desktop element of this audit, a review of relevant information held within the FSAI was also carried out ahead of on-site activities.

The audit included a review of the performance and delivery of official food controls by the county council. The audit team evaluated whether the official controls were being carried out in accordance with local authority veterinary service documented procedures which are used to implement the service contract requirements with the FSAI and related legislation.

As part of the audit of the food business operators, the audit team assessed the adequacy and performance of the controls put in place at establishment level in relation to the implementation of good hygiene practices and principles of HACCP as part of the food business operator's food safety management system and traceability systems and assessed whether these were effective, adequately maintained and in compliance with food law.

On completion of the on-site visits to establishments, the audit findings relevant to each food business operator were outlined by the FSAI audit team. The food business operator was informed that the FSAI would communicate the audit findings to the county veterinary officer and follow-up in relation to these would be carried out by him. Following completion of the establishment audits, a final closing meeting was held by phone with the county veterinary officer where findings were discussed. Written preliminary findings were subsequently sent to the county veterinary officer.

## **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.**

**Article 4(2) c The competent authorities shall ensure: that they have, or have access to, an adequate laboratory capacity for testing and a sufficient number of suitably qualified and experienced staff so that official controls and control duties can be carried out efficiently and effectively.**

## Findings

One veterinary inspector manages the activities of five temporary veterinary inspectors and carries out official controls in 21 food establishments. Laboratories used by the service are those listed on the national residue control plan and Cork County Council Laboratory.

There is no system in place to manage potential conflicts of interests with temporary veterinary inspectors or to review performance of temporary veterinary inspectors. The county veterinary officer carries out ante-mortem/post-mortem inspections when two of the temporary veterinary inspectors are on leave. A bilateral agreement was being organised with Monaghan County Council to assist as required in the event of an incident or when the county veterinary officer is on leave, but it was not in place at the time of the audit.

### **4.1.2 Coordination and Planning of Official Controls<sup>1</sup>**

**Article 4(3) of Regulation (EC) No 882/2004 provides for efficient and effective coordination and cooperation between competent authorities.**

**Article 4(5) of the Regulation requires that, when within a competent authority, more than one unit is competent to carry out official controls, efficient and effective coordination and cooperation shall be ensured between the different units.**

## Findings

Official controls are carried out regularly and in general, were unannounced to the food business operator. However, the county veterinary officer does not have a documented planned official control programme in place setting down official control targets for inspections and sampling. There is no documented procedure in place for reviewing the number of inspections, their outcomes or whether frequency of inspections is being achieved. Premises have been risk assessed but the risk assessment has not been reviewed since first completed in 2008 over six years ago or when the premises was first profiled.

SOP (Standard Operating Procedure) No. D25 Risk Assessment of Establishments provides for the following inspections frequencies based on risk:

- Low-risk: 4-12 inspections per year
- Medium-risk: 6-24 inspections per year
- High-risk: 12–48 inspections per year
- Very high-risk: At discretion

The SOP allows for significant variation of inspection frequency (see discussion at 4.1.4). Inspections frequencies are not risk-based and are not based on the SOP (see Table 1 in Section 4.1.4).

Microbiological sampling programmes are provided to local authorities by Cork County Council Veterinary Laboratory and the programme is followed. Water sampling is carried out on an ad-hoc basis and was last completed in 2013 by the county veterinary officer in four food establishments.

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<sup>1</sup>**Recital 15** The competent authorities should ensure that where different control units are involved in carrying out official controls, appropriate coordination procedures are in place and effectively implemented.

**Recital 16** The competent authorities should also ensure that, where the competence to carry out official controls has been delegated from the central level to a regional or local level, there is effective and efficient coordination between the central level and that regional or local level.

### 4.1.3 Registration/Approval of Establishments

Article 31 of Regulation (EC) No 882/2004 requires competent authorities to establish procedures for food business operators to follow when applying for the registration of their establishments in accordance with the Regulation. In addition, it requires competent authorities to draw up and keep up-to-date, a list of food business operators which have been registered.

Article 2 of Commission Regulation (EU) No 210/2013 of 11 March 2013 on the approval of establishments producing sprouts, states food business operators shall ensure that establishments producing sprouts are approved by the competent authority in accordance with Article 6 of Regulation (EC) No 852/2004. The competent authority shall approve those establishments only provided that they comply with the requirements set out in Annex I to Regulation (EC) No 852/2004 and in the Annex to this Regulation.

#### Findings

Premises were approved as per the requirements of Regulation (EC) No 854/2004. However, there was no system in place to review the approval of establishments as required by the local authority veterinary procedures.

One establishment which is now registered and another which is closed did not have their approval withdrawn.

### 4.1.4 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 operators, the reliability of own checks and any additional information on non-compliance.

#### Findings

Frequencies of inspection are not dependent on risk, e.g. some medium or low-risk establishments have higher levels of inspection than some high-risk establishments (see Table 1).

**Table 1: Number of Inspections by Risk Category**

Risk Category	2012	2013	2014	Sum
Low	4	7	13	24
Low	2	2		
Low	4	3	1	8
Low	1	2		3
Low	4	7	2	13
Low	1	2	1	4

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Medium	4	6	2	12
Medium	4	4	2	10
Medium	3	3		6
Medium	2	3	4	9
Medium	6	6	3	15
Medium	12	11	5	28
Medium	4	3	2	9
Medium	7	6	1	14
Medium	6	6	4	16
Medium	3	2	3	8
Medium		2	1	3
High	15	8	4	27
High	2	6		8
High	6	7	2	15
High	3	6	3	12

The prescribed system of risk assessment for sampling set down by the FSAI in conjunction with local authorities in Recommendation 5<sup>2</sup> has not taken place. Microbiological samples are taken as per the instruction from Cork County Council. Some additives samples have been taken and sent to the Public Analyst Laboratory in the past.

Article 10 specifies how official controls should be carried out using appropriate control methods, such as monitoring, surveillance, verification inspection, audit, sampling and analysis. In Cavan, all inspections are carried out and recorded using a food premises inspection record. The veterinary inspector also carries out sampling. There was no evidence of different inspection techniques such as surveillance, audit verification inspection etc. being used.

In addition to checks on the hygiene conditions and an assessment of good manufacturing practice, good hygiene practice and HACCP-based procedures, Article 10 of Regulation (EC) No 882/2004 references a list of other factors that need to be included in an inspection such as raw materials, ingredients, packaging, cleaning, maintenance products, processes and labelling. There was very limited evidence of these processes or activities being inspected. Official controls in relation to non-hygiene legislation are limited, e.g. allergens, general labelling and nutritional and health claims.

<sup>2</sup> Recommendation 5 -Cross Agency Hygiene Package Implementation Working Group Implementation of Commission Regulation (EC) No 2073/2005 on microbiological criteria for foodstuffs in low throughput premises

#### **4.1.5 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 and must keep these procedures up-to-date.**

##### **Findings**

As per the service contract: ***‘The official agency shall carry out official controls in accordance with documented procedures developed by agreement between the Authority and the Local Authority Veterinary Service. These procedures shall provide information and instructions for staff performing official controls’.***

As per the service contract, the Local Authority Standardisation Working Group has put a series of documented procedures in place for local authority veterinary inspectors to ensure official controls are implemented in a standardised manner. Following inspections, the veterinary inspector completes a Food Premises Inspection Report as prescribed in these procedures. However, the majority of the procedures prescribed are not used, e.g. HACCP, water sampling, vehicle inspections, labelling checklists, traceability checks, design and maintenance of premises and equipment.

There is no SOP in place dealing with how the local authority should verify the effectiveness of their official control activities. There is no documented procedure in place to ensure the county veterinary officer checks that corrective action is taken to correct findings in previous inspections. On occasion, the county veterinary officer makes a note on an inspection report that the previous non-compliances were closed out.

#### **4.1.6 Identification, Follow-up and Close-out 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**

Official controls did not identify a number of the non-compliances identified by the audit team during on-site activities including:

- Absence of documented cleaning programmes
- HACCP non-compliances in both premises
- Equipment not in calibration

Non-compliances that were identified by the county veterinary officer during an inspection are reviewed at the next inspection to ensure corrective actions are taken. However, this is not well documented. Inspection reports are issued after each inspection. However, a number of inspection reports did not include an inspection result as required by the documented procedures.

Instructions to the food business operators on inspection reports are very limited and sometimes difficult to understand.

#### ***4.1.7 Reports to Food Business Operators and Announcing Inspections***

**Article 9 of Regulation (EC) No 882/2004 requires that competent authorities draw up reports on the official controls carried out, including a description of the purpose of official controls, the methods applied, the results obtained and any action to be taken by the business operator concerned. The competent authority shall provide the food business operator with a copy of the report on official controls carried out, at least in case of non-compliance.**

**Article 3 (2) of Regulation (EC) No 882/2004 requires official controls to be carried out without prior warning, except in cases such as audits where prior notification of the feed or food business operator is necessary. Official controls may also be carried out on an ad-hoc basis.**

#### **Findings**

Food Premises Inspection Reports are issued to the food business operator following inspections. However, there were differences between the list of inspections recorded on the Official Agency Premises Inspection database used by the local authorities and the inspection reports on the hard copy file.

There were some gaps in the completion of inspection reports issued, e.g. no inspection result and information regarding non-compliances was very vague.

#### ***4.1.8 Verification and Review of Official Controls and Procedures***

**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 corrective action is taken when needed and to update documentation as appropriate.**

## Findings

There is no documented official control plan in place to review and there is no evidence of any review of effectiveness within the council, e.g. inspection targets are not monitored. The inspection frequency is not linked to the risk rating of establishments. No internal audits of the veterinary service have taken place.

Inspections are not adequately documented. Ongoing non-compliances were not identified in the two establishments audited and the close-out of non-compliances is not always documented. In some cases, non-compliances identified previously were not followed up by the county veterinary officer.

A structured and organised approach for the prioritisation, planning, co-ordination and delivery of official controls is not in place. There are significant weaknesses in the system of official controls at identifying and closing out non-compliances in food businesses which need to be corrected to ensure that there is an effective system of official controls in food businesses under the supervision of Cavan County Council.

### **4.1.9 Staff Performing Official Controls**

**Article 4 (2) of Regulation (EC) No 882/2004 requires the competent authority to ensure staff performing official controls are suitably qualified and experienced staff, that appropriate and properly maintained facilities and equipment are available; and that staff performing controls are free of any conflict of interest.**

**Article 6 of Regulation (EC) No 882/2004 requires the competent authorities to ensure that staff receive appropriate training and are kept up-to-date in their competencies.**

## Findings

To retain their registration with the Veterinary Council of Ireland, the county veterinary officer and temporary veterinary inspectors are legally obliged to comply with the Council's Continuing Veterinary Education requirements. The county veterinary officer attends national meetings and training provided by the FSAI and/or the Department of Agriculture, Food and the Marine. The temporary veterinary inspectors' contracts with Cavan County Council require them to be registered with the Veterinary Council.

There is no documented food safety training programme in place for the county veterinary officer or the temporary veterinary inspectors. The veterinary inspector attends national meetings and training provided by the FSAI and/or the Department of Agriculture, Food and the Marine.

The numbers of non-compliances identified by the audit team show that more training is required to ensure that the county veterinary officer is enabled to better evaluate HACCP-based procedures in approved establishments and in relation to the requirements of Annex I and Annex II of Regulation (EC) No 852/2004 and non-hygiene areas of the service contract such as labelling and food contact materials etc.

The temperature probe used by the veterinary inspector was not in calibration at the time of the audit.

The list of Designated Officers is not up-to-date. Veterinary staff were authorised as required and warrants had been issued but were not available at the time of the audit.

## **4.2 Official Controls Performed in Food Establishments**

An overview of the on-site verification work in both the establishments audited is provided in Annex I of the report. A compliance notice was issued by the county veterinary officer on the food business operator in the slaughterhouse audited for breaches of food safety regulations.

A brief summary under (a) Structure, Maintenance and Operational Hygiene and (b) Food Safety Management System and (c) Traceability is provided below:

### **Findings**

#### **(a) Structure, Maintenance and Operational Hygiene**

**Article 4(2) of Regulation (EC) No 852/2004 establishes that the food business operator carrying out any stage of production, processing and distribution of food after the stage of primary production/associated operations shall comply with general hygiene requirements as set out in Annex II to Regulation (EC) No 852/2004. These provisions relate to cleaning and maintenance, layout, design, construction, siting and size of food premises.**

In general, production areas were maintained in a satisfactory condition. However, hygiene and maintenance non-compliances were identified in the slaughterhouse. Deficiencies in the HACCP-based procedures indicated a need for further training for both food business operators.

#### **(b) Food Safety Management System**

**On the basis of Article 5 of Regulation (EC) No 852/2004, the food business operator shall put in place, implement and maintain a permanent procedure or procedures based on the HACCP principles. Regulation (EC) No 852/2004 allows the HACCP-based procedures to be implemented with flexibility so as to ensure that they can be applied in all situations.**

Weaknesses with the food safety management systems were identified in both establishments audited. In the slaughterhouse, there were inadequate controls at the critical control points (CCPs) and limited documentation of controls. In the ready-to-eat establishments, the monitoring and verification of CCPs were inadequate.

#### **(c) Traceability**

The traceability of bovine species was in place in the slaughterhouse audited. However, it was not evident that traceability of ovine species could be maintained throughout the process. There were no commercial documents accompanying carcasses leaving the slaughterhouse on the day of the audit.

Traceability requirements were being complied with in the ready-to-eat establishment.

## **5. CONCLUSIONS**

A structured and organised approach for the prioritisation, planning, coordination and delivery of official controls is not in place. The current organisation of controls is not always effective at identifying non-compliances in food businesses. Serious findings have been identified during the audit in relation to the organisation and implementation of official controls. Measures to correct these findings need to be implemented as a matter of urgency. Following on-site establishment audits, one establishment was issued with a Compliance Notice.

## **6. 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 addressed by Cavan County Council so that the effectiveness of the service can be established. In addition, findings in this series of audits should be disseminated to all local authorities by the local authority veterinary service and/or the FSAI, to enhance official controls nationally.

## Annex I: Summary of On-site Findings

### Food Business Operator 1

Findings related to non-compliance with Food Law	
1.	<p><b>HACCP based principles</b></p> <p><b>Regulation (EC) No 852/2004, Article 5(1)</b> <i>Food business operators shall put in place, implement and maintain a permanent procedure or procedures based on the HACCP principles.</i></p> <p><b>Regulation (EC) No 852/2004, Article 5(2)</b></p> <ul style="list-style-type: none"> <li>(a) <i>Food business operators shall identify any hazards that must be prevented, eliminated or reduced to acceptable levels</i></li> <li>(b) <i>identifying the critical control points at the step or steps at which control is essential to prevent or eliminate a hazard or to reduce it to acceptable levels</i></li> <li>(c) <i>establishing critical limits at critical control points which separate acceptability from unacceptability for the prevention, elimination or reduction of identified hazards</i></li> <li>(d) <i>establishing and implementing effective monitoring procedures at critical control points</i></li> <li>(e) <i>establishing corrective actions when monitoring indicates that a critical control point is not under control</i></li> <li>(f) <i>establishing procedures, which shall be carried out regularly, to verify that the measures outlined in subparagraphs (a) to (e) are working effectively; and</i></li> <li>(g) <i>establishing documents and records commensurate with the nature and size of the food business to demonstrate the effective application of the measures outlined in subparagraphs (a) to (f)</i></li> </ul> <p>The food safety management system was currently under review.</p> <p>The food business operator's food safety management system was not up-to-date or reflective of its current operation. There was no hazard analysis and no validation of CCPs.</p> <p>There was limited and sometimes no evidence available of monitoring and verification procedures for the two CCPs, e.g. incomplete records of QC 006 Final Carcase Inspection and QC007 Carcase Chill record checklist.</p> <p>There were no cleaning records or documented cleaning programme in place.</p> <p>A pest control contract was in place but no action was being taken following inspections where evidence of rodent activity was identified.</p> <p>The supplier and customer lists were incomplete.</p>
2.	<p><b>Cleaning and Maintenance</b></p> <p><b>Regulation (EC) No 852/2004: Annex II, Chapter I (1)</b> <i>Food premises are to be kept clean and maintained in good repair and condition.</i></p> <p><b>Regulation (EC) No 852/2004: Annex II, Chapter I (2)</b></p> <ul style="list-style-type: none"> <li>(a) <i>The layout, design, construction, siting and size of food premises are to: permit good food hygiene practices, including protection against contamination and, in particular, pest control</i></li> </ul>

	<p><b>(b) Be such as to protect against the accumulation of dirt, contact with toxic materials, the shedding of particles into food and the formation of condensation or undesirable mould on surfaces</b></p> <p><b>(c) Permit good food hygiene practices, including protection against contamination and, in particular, pest control</b></p> <p>The premises was not in production on the day of the audit. In general, production areas and chills were maintained in a satisfactory condition. Dirt was observed on the floor in the entrance to the slaughterhouse, main processing hall and on floors of the chills freezer. One area of the wall surfaces in the abattoir was not smooth or clean.</p> <p>A chill door was damaged and poor hygiene and maintenance of staff amenities was observed.</p>
3.	<p><b>Staff Training</b></p> <p><b>Regulation (EC) No 852/2004, Annex II, Chapter XII (2)</b> <b>Food business operators are to ensure that those responsible for the development and maintenance of the procedure referred to in Article 5(1) of this Regulation or for the operation of relevant guides have received adequate training in the application of the HACCP principles</b></p> <p>The gaps in the HACCP system indicate a requirement for immediate training.</p>
4.	<p><b>Traceability</b></p> <p><b>Regulation (EC) No 178/2002, Article 18</b></p> <ol style="list-style-type: none"> <li><b>1. The traceability of food, feed, food-producing animals, and any other substance intended to be, or expected to be incorporated into a food or feed shall be established at all stages of production, processing and distribution.</b></li> <li><b>2. Food and feed business operators shall be able to identify any person from whom they have been supplied with a food, a feed, a food-producing animal, or any substance intended to be, or expected to be, incorporated into a food or feed. To this end, such operators shall have in place, systems and procedures which allow for this information to be made available to the competent authorities on demand.</b></li> <li><b>3. Food and feed business operators shall have in place, systems and procedures to identify the other businesses to which their products have been supplied. This information shall be made available to the competent authorities on demand.</b></li> <li><b>4. Food or feed which is placed on the market or is likely to be placed on the market in the Community shall be adequately labelled or identified to facilitate its traceability, through relevant documentation or information in accordance with the relevant requirements of more specific provisions. No traceability system in place to identify where food is purchased.</b></li> </ol> <p><b>Article 7 of Regulation 853/2004 requires that food business operator shall ensure that certificates or other documents accompany consignments of products of animal origin.</b></p> <p>Traceability of bovine species was in place. However, it was not evident that the traceability of ovine species could be maintained (invoices were requested for August and September and only September was provided).</p> <p>There was no Commercial Document/CMR available for the beef being loaded on the day of the audit.</p> <p>No traceability records were available for one customer.</p>

5.	<p><b>Microbiological Criteria</b></p> <p><b>Regulation 2073/2005</b></p> <p>Sampling was being undertaken at the veterinary inspector's instruction.</p> <p><b>Article 3.1 - General Requirements</b> <i>Food business operators shall ensure that foodstuffs comply with the relevant microbiological criteria set out in Annex I. To this end the food business operators at each stage of food production, processing and distribution, including retail, shall take measures, as part of their procedures based on HACCP principles together with the implementation of good hygiene practice, to ensure the following:</i></p> <ul style="list-style-type: none"><li><i>(a) That the supply, handling and processing of raw materials and foodstuffs under their control are carried out in such a way that the process hygiene criteria are met</i></li><li><i>(b) That the food safety criteria applicable throughout the shelf-life of the products can be met under reasonably foreseeable conditions of distribution, storage and use</i></li></ul> <p>The food business operator had not taken the relevant process and food safety criteria into consideration when designing their food safety management system.</p>
6.	<p><b>Council Directive 98/83/EC Water</b></p> <p>The food business operator uses a mains supply provided by Cavan County Council. No water testing carried out by the food business operator to verify compliance with the Drinking Water Directive.</p>

**Food Business Operator 2**

<b>Findings related to non-compliance with Food Law</b>	
1.	<p><b>HACCP-based Procedures</b></p> <p><b>Regulation (EC) No 852/2004, Article 5(1)</b> <i>Food business operators shall put in place, implement and maintain a permanent procedure or procedures based on the HACCP principles.</i></p> <p><b>Regulation (EC) No 852/2004, Article 5(2)</b></p> <ul style="list-style-type: none"> <li>(a) <i>Food business operators shall identify any hazards that must be prevented, eliminated or reduced to acceptable levels</i></li> <li>(b) <i>identifying the critical control points at the step or steps at which control is essential to prevent or eliminate a hazard or to reduce it to acceptable levels</i></li> <li>(c) <i>establishing critical limits at critical control points which separate acceptability from unacceptability for the prevention, elimination or reduction of identified hazards</i></li> <li>(d) <i>establishing and implementing effective monitoring procedures at critical control points</i></li> <li>(e) <i>establishing corrective actions when monitoring indicates that a critical control point is not under control</i></li> <li>(f) <i>establishing procedures, which shall be carried out regularly, to verify that the measures outlined in subparagraphs (a) to (e) are working effectively; and</i></li> <li>(g) <i>establishing documents and records commensurate with the nature and size of the food business to demonstrate the effective application of the measures outlined in subparagraphs (a) to (f)</i></li> </ul> <p>The food business operator's food safety management system was not up-to-date and reflective of its current operation. The risks associated with cutting ready-to-eat meat and controls necessary were not reflected adequately in the HACCP documentation, e.g. movement of staff from raw to ready-to-eat areas – procedures, adequate changes, exposed product and packaging etc.</p> <p>The monitoring and verification of CCPs was found to be inadequate, e.g. one CCP is checking temperature of incoming product and the temperature probe was not calibrated. There were no documented checks on chill temperature.</p> <p>There was no documented cleaning programme.</p> <p>The supplier list was incomplete, although traceability of products was in place.</p>
2.	<p><b>Staff Training</b></p> <p><b>Regulation (EC) No 852/2004, Annex II, Chapter XII (2)</b> <i>Food business operators are to ensure that those responsible for the development and maintenance of the procedure referred to in Article 5(1) of this Regulation or for the operation of relevant guides have received adequate training in the application of the HACCP principles</i></p> <p>The deficiencies in the HACCP-based procedures indicate a requirement for further training.</p>
3.	<p><b>Microbiological Criteria</b></p> <p><b>Regulation 2073/2005</b></p> <p>Sampling was being undertaken at the veterinary inspector's instruction.</p> <p><b>Article 3.1 - General Requirements</b></p>

**Audit of Official Controls carried out by the Local Authority Veterinary Service  
– Cavan County Council**

NOVEMBER 2015

	<p><b>Food business operators shall ensure that foodstuffs comply with the relevant microbiological criteria set out in Annex I. To this end the food business operators at each stage of food production, processing and distribution, including retail, shall take measures, as part of their procedures based on HACCP principles together with the implementation of good hygiene practice, to ensure the following:</b></p> <p><b>(a) That the supply, handling and processing of raw materials and foodstuffs under their control are carried out in such a way that the process hygiene criteria are met</b></p> <p><b>(b) That the food safety criteria applicable throughout the shelf-life of the products can be met under reasonably foreseeable conditions of distribution, storage and use</b></p> <p>The food business operator had not taken the relevant process and food safety criteria into consideration when designing their food safety management system.</p>
4	<p><b>Council Directive 98/83/EC Water</b></p> <p>Water is provided from a local group supply.</p> <p>No water testing results were available on the day of the audit to verify compliance with the Drinking Water Directive. However, the County Council provided satisfactory water results for this establishment.</p>
5	<p><b>Hand-washing Facilities</b></p> <p><b>Regulation (EC) No 852/2004, Annex II, Chapter I (4)</b> <b>An adequate number of washbasins is to be available, suitably located and designated for cleaning hands. Washbasins for cleaning hands are to be provided with hot and cold running water, materials for cleaning hands and for hygienic drying. Where necessary, the facilities for washing food are to be separate from the hand-washing facility.</b></p> <p>On the day of the audit, there was no hot water for hand-washing in the cooked area (this area was not in production on the day of the audit).</p>
6.	<p><b>Registration and Approval of Establishments</b></p> <p><b>Article 4 of Regulation 853/2004 requires food business operators to have establishments manufacturing food of animal origin to be approved for the activities they are carrying out in accordance with the Regulation.</b></p> <p>The establishment was approved but the approval certificate was not available on the day of the audit. The approval certificate provided by the veterinary inspector after the audit is fully reflective of all operations but the food business operator did not have a copy of the approval certificate.</p>

On the day of the audit, dog mince was seen in the chill. Controls should be documented for the production and storage of dog mince:

- Risk assessed with relevant controls put in place
- Kept separate from food products for human consumption
- Clearly identified





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