

AUDIT
REPORT

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

NOVEMBER 2015



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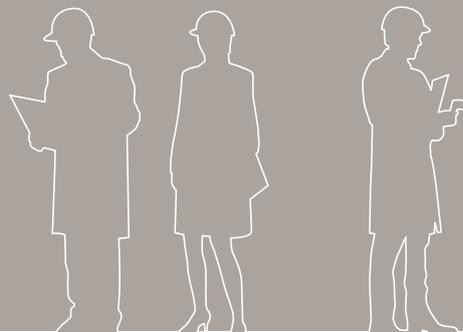


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1. GLOSSARY

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 Leitrim County Council from 22-23 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 agency's own procedures and plans.

Overall, the report concludes that the official controls are generally in compliance with the legislation and there is an organised approach to the identification and follow-up of non-compliances in food businesses under the supervision of the veterinary service.

The report lists a number of findings requiring corrective action aimed at rectifying identified shortcomings and enhancing the control system in place and the main findings include:

- Documentary and carcass inspections at ante-mortem and post-mortem inspections are not fully effective
- There is no documented planned official control programme in place. Inspections are carried out regularly however, this is not always risk-based
- Documented procedures prescribed by the local authority veterinary service are not always used. There was limited documented evidence of official controls in non-hygiene areas such as labelling, food contact materials etc.
- Official controls did not identify or close out on a number of the non-compliances identified by the audit team during on-site activities including:
 - Lack of food chain information accompanying cattle
 - No commercial documentation accompanying consignments of meat leaving the establishment
 - Hazard Analysis Critical Control Point (HACCP) non-compliances in both premises
 - Equipment not in calibration
 - No documented cleaning programmes

Corrective actions to the findings of this report are required to ensure the ongoing 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. Leitrim 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's 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 Leitrim 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.

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 two temporary veterinary inspectors and carries out official controls in ten food establishments. Laboratories used by the service are those listed on the national residue

control plan and Cork County Council Laboratory. On occasion, a private laboratory is used. Memoranda of Understanding are in place with both temporary veterinary inspectors setting down their duties, remuneration and the contract duration. The county veterinary officer has carried out an audit of one of the temporary veterinary inspector's performance, as a number of issues had arisen in the past regarding ante-mortem/post-mortem documentary checks. The temporary veterinary inspector's audit highlighted three areas of concern:

- ER 106 forms not provided at ante-mortem
- Inconsistencies in the *Trichinella* sampling numbers recorded
- Lack of food chain information received by the food business operator at time of ante-mortem

At the time of this audit, the issues identified were not fully resolved, e.g. one batch of animals slaughtered in a food business operation which this temporary veterinary inspector is responsible for, did not have correct ante-mortem/post-mortem certification. The county veterinary officer clarified following the audit, that the batch of animals concerned had been entered onto the Animal Identification Movement System a number of days after ante-mortem/post-mortem checks. Also, a batch of pig carcasses which had not been health marked in the slaughterhouse audited, were in a transport vehicle and no paper work was available to ensure ante-mortem/post-mortem had been completed. These carcasses were awaiting the results of *Trichinella* testing. The county veterinary officer carries out ante-mortem/post-mortem inspections when the temporary veterinary inspectors are on leave. Bilateral agreements are in place with Sligo County Council and Donegal County Council since December 2011 to assist as required, in the event of an incident or when the county veterinary officer is on leave.

4.1.2 Coordination and Planning of Official Controls¹

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. 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. Nevertheless, official controls are carried out regularly and are generally risk-based. The Official Agency Premises Identification database (OAPI) managed by the FSAI and inputted by the local authorities, is used to check inspection numbers, although this is not documented.

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

¹**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.

- 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 in Leitrim County Council are based on this SOP and the target number of inspections by the county veterinary officer is generally in the middle of the suggested target for each risk category. Microbiological sampling programmes are provided to local authorities by Cork County Council Veterinary Laboratory and the programme is followed. Water sampling is carried out by the county veterinary officer at least annually in all food business operators.

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 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 Regulation (EC) No 854/2004 but issues were identified with two approvals:

- One of the establishments does not require approval, it should be registered (IE 2341)
- Approval should be amended to reflect change in its activities (IE 2404)

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

Premises are risk assessed annually and this was last completed in September 2013. The outcome of the risk assessment is communicated to the food business operators. Frequencies of inspection however, are not always dependent on risk, e.g. sometimes lower risk establishments get the same level or more inspections than the high- or medium-risk establishments (see Table 1).

Table 1: Number of Inspections by Risk Category

Risk Category	2012	2013
High	7	16
Medium	10	8
Medium	10	9
Medium	2	3
Medium	8	6
Medium	10	9
Medium	5	5
Low	5	6
Low	3	4
Low	2	3
Low	2	2

A system of risk assessment for sampling is in place. This was completed in September 2014 and is in line with the guidance for microbiological criteria for food stuffs in low throughput establishments. Microbiological samples are taken as per the instruction from Cork County Council and in the past with the private laboratory. Some additives samples have been taken and sent to the Public Analyst Laboratory. One water sample is taken per establishment annually.

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 Leitrim, different techniques are used, e.g. full hygiene inspections, vehicle inspections, surveillance, sampling inspection etc.

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.

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’.***

The county veterinary officer applies the majority of the instructions provided in these local authority veterinary service procedures. The food premises report (SOP M2 Appendix B) is completed during each inspection and a typed report is sent to each food business operator after an inspection. However, the Food Premises Inspection Report, as prescribed in the local authority veterinary service procedures, and a number of other documents, are not used, e.g. revised HACCP form, vehicle inspection checklists.

There is no SOP in place dealing with how the local authority should verify the effectiveness of their activities.

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

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 and are closed out. This was documented on the establishment files held by Leitrim County Council. In the establishments visited, the non-compliances that were identified by the county veterinary officer were closed out.

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

- No commercial documentation accompanying consignments of meat leaving the establishment
- HACCP non-compliances in both premises
- Equipment not in calibration
- No documented cleaning programmes

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The appropriate food chain information was not accompanying cattle into the slaughterhouse audited. This had been previously identified by the county veterinary officer but it was not closed out. In May 2011, an internal audit, as prescribed by Regulation (EC) No 882/2004, was carried out by Sligo County Council County Veterinary Officer on the veterinary services in Leitrim County Council. Some of the non-compliances identified in that audit in 2011 were still evident in the establishments audited, e.g. lack of food chain information, non-compliances with HACCP plan. The audit team does not consider the current system of official controls to be effective at identifying or in some cases, closing-out deficiencies in food business operators.

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

A Food Premises Inspection Report is not completed or left with the food business operator as per SOP No. M2. Nevertheless, a letter is sent to the food business operator following the inspection, detailing non-compliances found during the inspection. Other hygiene inspection checklists are used.

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 SOP dealing with how local authority veterinary inspectors should verify the effectiveness of their activities. Close-out of non-compliances notices is well documented. There is no documented plan in place to review inspection and sampling targets. One audit on official controls carried out in Leitrim County Council, conducted by Sligo County Council, and an internal audit of the temporary veterinary inspector have taken place. However, some of the findings remain open. There are differences in the controls carried out and what is prescribed in the documented procedures.

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' contract with Leitrim County Council requires them to be registered with the Veterinary Council. There is no formal food safety or official control training plan for the county veterinary officer. The training plan in place by the council included two health and safety courses and attendance at seminars etc.

The county veterinary officer arranged training for temporary veterinary inspectors in January 2013. Issues have been identified by the county veterinary officer and the audit team regarding the completion of ante-mortem and post-mortem inspections. Further training may be required to enable the county veterinary officer to better evaluate HACCP-based procedures in approved establishments. The FSAI audit team identified issues in both systems assessed. There was limited documented evidence of official controls in non-hygiene areas such as labelling and food contact materials etc. Although the opportunity for conflicts of interest with the two temporary veterinary inspectors is minor, there is no formal system in place to manage potential conflicts.

The list of designated officers is not up-to-date. Veterinary staff were authorised as required and warrants had been issued.

4.2 Official Controls Performed in Food Establishments

An overview of the on-site verification work in both of the establishments audited is provided in Annex I of the report. 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.

Hygiene and maintenance non-compliances were identified in the slaughterhouse; the ready-to-eat establishment was in compliance. Gaps 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.

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

(c) Traceability

Food chain information was not available for consignments of carcasses entering the slaughterhouse audited. There were no commercial documents accompanying meat leaving the slaughterhouse, only labels. Traceability requirements were being complied with in the ready-to-eat establishment.

5. CONCLUSIONS

Leitrim County Council supervises ten food establishments under service contract to the FSAI. The audit team confirmed that there was a well-organised and structured approach for the delivery of official controls. Establishments are inspected regularly and in general, non-compliances that are identified are systematically closed out. However, findings in the two food business operators visited were identified by the audit team which will require corrective action.

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 Leitrim County Council so that the effectiveness of the service can be improved. 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>HACCP-based Procedures</p> <p>Regulation (EC) No 852/2004, Article 5(1) <i>Food business operators shall put in place, implement and maintain a permanent procedure or procedures based on the HACCP principles.</i></p> <p>Regulation (EC) No 852/2004, Article 5(2)</p> <ul style="list-style-type: none"> (a) <i>Food business operators shall identify any hazards that must be prevented, eliminated or reduced to acceptable levels</i> (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> (c) <i>establishing critical limits at critical control points which separate acceptability from unacceptability for the prevention, elimination or reduction of identified hazards</i> (d) <i>establishing and implementing effective monitoring procedures at critical control points</i> (e) <i>establishing corrective actions when monitoring indicates that a critical control point is not under control</i> (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> (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> <p>The food business operator's HACCP-based procedures were completed in 2008 and there was no evidence that they were reviewed in the establishment since then. There was no evidence available for the verification of CCPs.</p> <p>The two CCPs identified by the food business operator were not in control, e.g.</p> <ul style="list-style-type: none"> • CCP 1 Final carcass inspection records had been completed by the food business operator. When inspected by the audit team, there was minor contamination evident on 2/10 carcasses inspected • CCP 2 Chill records: As the temperature probe was not in calibration, control of this CCP could not be guaranteed
2.	<p>Cleaning and Maintenance</p> <p>Regulation (EC) No 852/2004: Annex II, Chapter I (1) <i>Food premises are to be kept clean and maintained in good repair and condition.</i></p> <p>Regulation (EC) No 852/2004: Annex II, Chapter I (2)</p> <ul style="list-style-type: none"> (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> (b) <i>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;</i>

	<p>(c) Permit good food hygiene practices, including protection against contamination and, in particular, pest control</p> <p>Cleaning and cleaning records were completed but evidence of hygiene deficiencies in the slaughterhouse were noted, in particular on the stainless steel fittings and walls of the bleeding area of the slaughterhouse.</p> <p>General ongoing maintenance issues were observed, e.g. some rust in slaughterhouse stainless steel, two open drains in the slaughterhouse, pooling on floor in animal by-product room.</p>
3.	<p>Staff Training</p> <p>Regulation (EC) No 852/2004, Annex II, Chapter XII (2) <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>There were gaps in the HACCP-based procedures indicating a requirement for further training. The appropriate application of HACCP-based procedures in low throughput slaughterhouses needs to be revisited.</p>
4.	<p>Traceability</p> <p>Regulation (EC) No 178/2002, Article 18</p> <ol style="list-style-type: none"> 1. <i>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.</i> 2. <i>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.</i> 3. <i>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.</i> 4. <i>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.</i> <p>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.</p> <p>Of the files reviewed, traceability requirements were in order.</p> <p>There were no commercial documents accompanying meat leaving the establishment; there were only labels attached.</p>
5.	<p>Food Chain Information</p> <p>Regulation 853 Annex II Section III <i>Food business operators operating slaughterhouses must, as appropriate, request, receive, check and act upon food chain information as set out in this Section in respect of all animals,</i></p>

	<p><i>other than wild game, sent or intended to be sent to the slaughterhouse. 1. Slaughterhouse operators must not accept animals onto the slaughterhouse premises unless they have requested and been provided with relevant food safety information contained in the records kept at the holding of provenance in accordance with Regulation (EC) No 852/2004</i></p> <p>No food chain information had been requested or received by the food business operator for cattle and the temporary veterinary inspector had not taken corrective action.</p>
6.	<p>Microbiological Criteria</p> <p>Regulation 2073/2005 Article 3.1 <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> <p style="padding-left: 40px;"><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> <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></p> <p>Sampling was being undertaken at the county veterinary officer's instruction.</p> <p>The food business operator was not aware of sampling requirements or of considering the process hygiene and food safety criteria when designing their HACCP-based procedures.</p>
7.	<p>Water Supply</p> <p>Regulation (EC) No 852/2004, Annex II, Chapter VII <i>1. (a) There is to be an adequate supply of potable water, which is to be used whenever necessary to ensure that foodstuffs are not contaminated;</i></p> <p>No water testing to verify compliance with the Drinking Water Directive (Council Directive 98/83/EC Water) had been carried out by the food business operator although the business is on a public mains water supply² which is sampled by Leitrim County Council.</p>
8	<p>Hand-Washing Facilities</p> <p>Regulation (EC) No 852/2004, Annex II, Chapter I (4) <i>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.</i></p> <p>A wash-basin was located in the toilet area but there are no hand-washing facilities available between the entrance to the slaughterhouse building, carcase chill 1 and the slaughter room.</p>

² Official control water samples were taken on 11 Feb 2014 and the result was satisfactory

Food Business Operator 2

Findings related to non-compliance with Food Law	
1.	<p>HACCP-based Procedures</p> <p>Regulation (EC) No 852/2004, Article 5(1) <i>Food business operators shall put in place, implement and maintain a permanent procedure or procedures based on the HACCP principles.</i></p> <p>Regulation (EC) No 852/2004, Article 5(2)</p> <ul style="list-style-type: none"><i>(a) Food business operators shall identify any hazards that must be prevented, eliminated or reduced to acceptable levels</i><i>(b) 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><i>(c) establishing critical limits at critical control points which separate acceptability from unacceptability for the prevention, elimination or reduction of identified hazards</i><i>(d) establishing and implementing effective monitoring procedures at critical control points</i><i>(e) establishing corrective actions when monitoring indicates that a critical control point is not under control</i><i>(f) establishing procedures, which shall be carried out regularly, to verify that the measures outlined in subparagraphs (a) to (e) are working effectively; and</i><i>(g) 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> <p>Weaknesses were identified by the audit team in HACCP-based procedures, e.g. not all relevant hazards were identified and adequately addressed.</p> <p>The risk associated with exposed cooked product on shelves in the blast-chill had not been identified or assessed. There was limited evidence of the validation of CCPs. The monitoring and verification of CCPs was found to be inadequate, e.g. there are two CCPs, one includes a temperature check but as the temperature probe was not calibrated compliance with this CCP could not be guaranteed. Also, there were no documented checks on chill temperature.</p> <p>Product labels were examined and they carried clear cooking instructions. However, the food business operator's documented procedures were unclear regarding product classification as ready-to-eat or non-ready-to-eat and this has important implications for the HACCP-based procedures, necessary controls and product testing.</p> <p>A documented cleaning programme was in place but was unavailable at the time of the audit.³</p>

³ The quality control manager had recently resigned and the staff available on the day of the audit were not in a position to outline the hazard identification and analysis procedure. A food safety consultant had been recently appointed to the premises and a new quality control manager is in place.

2.	<p>Staff Training</p> <p>Regulation (EC) No 852/2004, Annex II, Chapter XII (2) <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>There were gaps in the HACCP-based procedures indicating a requirement for further training.</p>
3.	<p>Microbiological Criteria</p> <p>Regulation (EC) No 2073/2005 Article 3.1 <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"> <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> <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> <p>Sampling was being undertaken at the county veterinary officer's instruction.</p> <p>Weaknesses were identified with the food business operator's shelf-life studies.</p> <p>The food business operator had not taken the relevant process and food safety criteria into consideration when designing their HACCP-based procedures.</p>
4	<p>Water supply</p> <p>Regulation (EC) No 852/2004, Annex II, Chapter VII <i>1. (a) There is to be an adequate supply of potable water which is to be used whenever necessary to ensure that foodstuffs are not contaminated;</i></p> <p>Water is provided from Leitrim County Council's mains water supply.</p> <p>The food business operators' water testing results were available for November 2013⁴.</p>

⁴ Official control water sample was taken on 17 Sept 2014. The result was satisfactory.



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