

AUDIT
REPORT

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

NOVEMBER 2015



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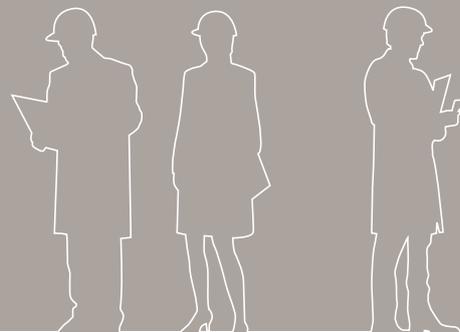


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1. GLOSSARY

CCP	Critical Control Point
FSAI	Food Safety Authority of Ireland
HACCP	Hazard Analysis Critical Control Point
OAPI	Official Agency Premises Inspection
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 Monaghan County Council from 21-23 October 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 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:

- There is no documented planned official control programme in place. Inspections are carried out regularly. However, they are not always risk-based
- Documented procedures prescribed by the local authority veterinary service are not always followed. There was limited documented evidence of official controls in non-hygiene areas such as labelling, food contact materials etc
- Official controls did not close out an ongoing non-compliance in relation to the food safety management system in one food business

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 inspection process.

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. Monaghan 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 Monaghan 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.

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. The implementation of good hygiene practices and principles of HACCP (Hazard Analysis Critical Control Point) as part of the food business operator's food safety management system and traceability systems were assessed to determine if they 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 for follow-up. 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 full-time veterinary inspector carries out official controls in 16 food establishments of which seven are registered and nine approved (four slaughter establishments and five small meat manufacturing establishments). Two temporary veterinary inspectors are contracted for ante-mortem and post-mortem inspection duties and in the event of annual leave, veterinary staff in private veterinary practices carry out meat inspections. There is no formal system in place to deal with any potential conflict of interest that might arise.

Laboratories used by the service are as indicated on the national residue control plan - Monaghan Veterinary Laboratory and Cork County Council.

A Section 85 Order is in place with Louth County Council. Monaghan County Council has also passed a resolution to allow the veterinary inspector from Cavan County Council to carry out official duties in County Monaghan.

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

The veterinary inspector plans a monthly inspection for high-risk food business operations: one inspection every two months for medium-risk and one inspection every three months for low-risk establishments. In 2013, this target was generally met except in one medium-risk premises. This planned inspection target is not documented and the official control programme in place setting down official control targets for inspections and sampling is not outlined. Consideration should be given to producing an annual control programme and to documenting the routine monthly and quarterly reviews.

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).

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.

Microbiological samples are taken as per the instruction from Cork County Council who manages a national sampling plan for all local authorities. Water samples are sent to Monaghan Veterinary Laboratory. Water samples were taken in all approved establishments and none were taken in registered establishments. Nitrate samples from three establishments have been taken for analysis by the Public Analyst Laboratory. Sulphite testing took place in 2012.

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 or registered as required by the Regulations.

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

Official controls are carried out regularly. Premises are risk assessed and the risk assessments are reviewed annually. Audits are not always conducted annually, e.g. one high-risk establishment had an audit in November 2011 and again in September/October 2013.

Frequencies of inspection are not always dependent on the risk rating of the establishment, e.g. some medium-risk establishments have received more inspections than the high-risk establishments and on occasion, some low-risk establishments receive more inspections than the medium-risk (see Table 1).

Table 1: Number of Inspections by Risk Category

Risk Category	2012	2013
Low	14	5
Low	4	5
Medium	6	12
Medium	2	3
Medium	6	12
High	7	11
High	14	19
High	7	11
High	10	15
High	6	12

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 Monaghan, 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 some limited evidence of these processes with the non-hygiene legislation being inspected in some establishments e.g. labelling and food contact materials.

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 (LAVS). 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. The veterinary inspector was a member of this committee in the past.

The county veterinary officer completes the Food Premises Inspection Report and leaves this at the establishment after an inspection. Following an audit, the county veterinary officer writes to the food business operator outlining any non-compliance identified. There are some differences in the controls carried out and what is prescribed in the documented procedures, e.g. a number of forms were not used to report on official controls in some establishments; revised HACCP forms, vehicle inspection checklists.

The veterinary inspector does not have a fully documented system of checking previous non-compliances during the next inspection so as to provide a documentary trail that non-compliances identified previously are 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

Non-compliances identified by the county veterinary officer during an inspection are reviewed at the next inspection to ensure corrective actions are taken. Close-out of non-compliances was generally documented on the establishment files held by Monaghan County Council but this was not always the case.

Non-compliances identified by the county veterinary officer previously, in relation to the food safety management system (see Annex 1) in one establishment audited, had not been closed out by the food business operator.

Non-compliances in relation to post-mortem inspections were identified in both establishments audited. Some offal was not retained for post mortem inspection (see Annex 1).

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 as per SOP No. M2 Hygiene Inspections of Establishments is left with the food business operator following an inspection. In addition, letters detailing the findings are posted to the food business operator following audits. In general, inspections are unannounced and audits are announced.

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

A system of risk assessment for both establishment inspection and establishment sampling is in place and is reviewed.

There is no documented plan in place to review inspection and sampling targets and there was evidence of targets set down by the county veterinary officer not always being fully met. In the past, issues were identified by the county veterinary officer with the temporary veterinary inspectors' ante-mortem and post-mortem certification and to rectify this, the county veterinary officer reviews the certification at three of the four slaughter establishments. The fourth slaughter establishment has a very low throughput and operates very irregularly.

Close-out of non-compliances was generally documented but this was not always the case. Internal audits have not taken place to date however, one is planned to be carried out by the Louth County Council veterinary inspector later in the year. There is no SOP dealing with how local authority veterinary inspectors should verify the effectiveness of their activities.

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 training plan in place by the council includes health and safety courses and HR-related courses only. The county veterinary officer attends national meetings and training provided by the FSAI and/or the Department of Agriculture, Food and the Marine (animal welfare). There was limited documented evidence of official controls in non-hygiene areas such as labelling, food contact materials etc.

A training course on food law was organised by the county veterinary officer for abattoir owners in 2012 and the temporary veterinary inspectors attended that evening. A meeting with temporary veterinary inspectors took place in September 2012 and the county veterinary officer provided an overview of the standard operating procedures.

The chief executive of Monaghan County Council and the county veterinary officer have been appointed as designated officers. 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.

No significant hygiene or maintenance non-compliances were identified in the slaughterhouses audited.

(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.

Significant weaknesses with the food safety management system were identified in one slaughterhouse and these had been identified previously by the county veterinary officer but were not remedied by the food business operator.

(c) Traceability

Traceability requirements were being complied with in the one slaughterhouse audited. In the other slaughterhouse, a system of traceability was in place. However, the traceability records prescribed in the food safety management system were not fully completed for a number of animals.

5. CONCLUSIONS

Monaghan County Council supervises 16 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 are systematically closed out.

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 Monaghan 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

The slaughterhouse had finished slaughtering on the day of the audit. Hygiene and maintenance at the premises were satisfactory. Food safety management system and traceability documentations were reviewed and proportionate to the scale of the establishment.

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>One minor issue was noted regarding the number of CCPs in the food safety management system (flow diagram) and this needs to be updated to reflect that the food business operator is working with two CCPs.</p>
2.	<p>Post-mortem Inspection</p> <p>Regulation 854/2004 Annex I Fresh Meat Section I: Tasks of Official Veterinarian Chapter II Inspection Tasks D. Post-mortem inspection</p> <p>1. Carcasses and accompanying offal are to be subjected without delay after slaughter to post-mortem inspection. All external surfaces are to be viewed.</p> <p>Some offal, e.g. sheep heads, stomachs of cattle, was not retained for post-mortem inspection.</p>

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>The own check controls identified in the food safety management system did not reflect the controls implemented by the food business operator. The flow diagram identified two CCPs (CCP 1 Carcase grading, weighing and stamping and CCP 2 Final carcase inspection). Of these CCPs, only CCP 2 is actually being controlled.</p> <p>It was not possible to verify that the chill temperatures stayed within the range identified in the HACCP manual of <4°C air temp of chill and <12 °C in the prep room. The chill temperature was displayed but not recorded/monitored. The food business operator said that the temperature of the chill fluctuates with ambient temperatures which may indicate the temperature is not in control.</p> <p>Some of the checklists outlined in the food safety management system were incomplete. e.g.</p> <ul style="list-style-type: none"> • Abattoir Problem Identification Form – steriliser temperature was not always recorded • Disposal of animal by-product on the slaughter records for traceability (although it is noted that the animal by-product commercial documents for disposal of bone and offal were complete) <p>The cattle associated with the tags selected on the day of the audit were verified by the veterinary inspector as having received ante-mortem and post-mortem inspections.</p>

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>The gaps between the HACCP-based procedures identified in the food safety management system and those implemented by the food business operator indicate a requirement for further training for the food business operator.</p>
3.	<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>Of the products reviewed, there was a system of traceability in place. However, the traceability record was not fully completed for a number of animals reviewed.</p> <p>Commercial documents were not available for hide disposal.</p>
4.	<p>Cleaning and Maintenance</p> <p>Regulation (EC) No 852/2004, Annex II, Chapter I (2) <i>The layout, design, construction, siting and size of food premises are to:</i></p> <ol style="list-style-type: none"> (a) <i>permit adequate maintenance, cleaning and/or disinfection, avoid or minimise air-borne contamination, and provide adequate working space to allow for the hygienic performance of all operations;</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> (c) <i>permit good food hygiene practices, including protection against contamination and, in particular, pest control;</i> <p>The container units on the grounds of the establishment may cause pest control issues around the establishment.</p>

5.	<p>Post-mortem Inspection</p> <p>Regulation 854/2004 Annex I Fresh Meat Section I: Tasks of Official Veterinarian Chapter II Inspection Tasks D. Post-mortem inspection</p> <p><i>1. Carcases and accompanying offal are to be subjected without delay after Slaughter to post-mortem inspection. All external surfaces are to be viewed.</i></p> <p>Some offal, e.g. cattle stomachs and green offal, was not retained for post-mortem inspection and the lambs lungs were dumped prior to inspection.</p>
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