

AUDIT  
REPORT

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

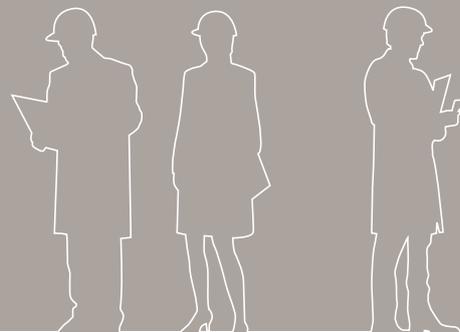
NOVEMBER 2015



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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 Sligo County Council from 15-16 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 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 Sligo County Council veterinary service.

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

- 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 allergens, food contact materials, additives etc
- The summary sheet designed by the county veterinary officer to facilitate planning and scheduling of inspections should be updated to reflect all forms prescribed in the documented procedures for local authorities
- Significant non-compliances were identified in the manufacturing establishment audited in relation to HACCP-based procedures. The audit team does not consider the current system of official controls to be effective at identifying deficiencies in this food business operator's HACCP-based procedure

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. Sligo 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, food vehicles 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 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 Sligo 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 food 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 was 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 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. Preliminary findings were issued in hard copy following that meeting.

## **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 four food establishments (in addition one food establishment opens for seasonal poultry slaughter for one or two days a year). The county veterinary officer carries out the ante-mortem and post-mortem checks in the two slaughterhouses in the county. Two temporary veterinary inspectors are contracted for ante-mortem and post-mortem inspections duties when the county veterinary officer is on leave. There is no documented system in place to deal with any potential conflict of interest that might arise for temporary veterinary inspectors, although it is acknowledged this is unlikely (see 4.15).

Laboratories used by the service are those listed on the national residue control plan: Sligo County Council and Cork County Council.

A bilateral agreement is in place with Leitrim County Council since December 2011 to assist as required in the event of an incident or when the county veterinary officer is on leave.

An internal audit had not taken place however, one was planned to be carried out in Sligo by the Leitrim County Council veterinary inspector later in the year. The veterinary inspector coordinates the national internal audit system for the local authority veterinary service.

### **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. The county veterinary officer has developed a summary sheet of all inspections and checklists that need to be completed in each premises annually. This summary sheet is held on the front of each establishment file and is completed by the county veterinary officer following inspections. This allows the veterinary inspector to review when each checklist was last completed and what inspections need to be done by year end.

Premises are risk assessed and the risk assessments are reviewed annually.

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

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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.

The SOP allows for significant variation of inspection frequency (see discussion at 4.1.4). The veterinary inspector has decided on a monthly inspection frequency for all premises. In 2013 this target was generally met and the high-risk establishment received a number of additional inspections.

Microbiological samples are taken as per the instruction from Cork County Council, who manages a national sampling plan for all local authorities, and water samples are sent to Sligo County Council Laboratory. At the time of the audit, water samples were taken in three of the four establishments. Samples were not taken in the seasonal poultry plant as the premises had not been in operation in 2014. Sulphite testing will commence in 2015 and nitrate samples will also be taken for analysis at the Public Analyst Laboratory in 2015.

### **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 an issue was identified with the approval status of the ready-to-eat establishment audited. The establishment handles/cooks raw fish and the approval certification did not reflect this.<sup>2</sup>

### **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. The outcome of the risk assessment is communicated to the food business operators. The number of inspections by risk category is shown in Table 1.

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<sup>2</sup> The approval certificate was amended.

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

Risk Category	2012	2013
High	9	15
Medium	10	12
Medium	10	11
Medium	10	12

**Source:** Official Agency Premises Inspection data, 2014

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 Sligo, 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. These processes were examined by the county veterinary officer during audits.

#### 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.**

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’***

#### Findings

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 completes the Food Premises Inspection Report and the audit reports as prescribed in these procedures however, a number of forms were not yet used in some establishments, e.g. revised HACCP forms or some checklists were not applied at the frequencies laid down in the SOPs, e.g. vehicle inspection checklists.

The summary sheet used by the county veterinary officer for planning and inspections for slaughterhouses does not list all of the forms prescribed in the documented procedures for local authorities, e.g. Audit of Staff Training Programme (SOP No D6 ), Audit of Personal Hygiene (SOP No D8) etc.

One inspection book is used per establishment to allow the veterinary inspector to assess previous non-compliances and close-out effectively. Nationally, there is no SOP in place dealing with how a local authority should (a) verify the effectiveness of their activities or (b) manage potential conflicts of interest.

#### **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**

One inspection book is used per establishment. This allows for non-compliances identified previously to be checked at the next inspection, which is generally done. The slaughterhouse was not in operation on the day of the audit but hygiene, maintenance, HACCP and traceability documentation at the premises were satisfactory. Non-compliances were identified by the county veterinary officer in the manufacturing establishment audited in relation to hygiene facilities, HACCP-based procedures and in particular, the risks of cross-contamination. Although the food business operator had taken some corrective actions many of the significant deficiencies previously identified were not closed out.

#### **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 left with the food business operator as per SOP No. M2. 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**

Nationally, there is no SOP dealing with how local authority veterinary inspectors should verify the effectiveness of their activities. There is a documented system in place to review inspection targets and the types of inspections completed. Both establishments inspected were risk assessed. Close-out of non-compliances was not always documented. The system of official controls did not identify and close out significant deficiencies in the manufacturing establishment audited.

#### **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. There is no food safety training plan for the county veterinary officer. The training plan in place by the council included health and safety courses and attendance at seminars etc. The council has facilitated the veterinary inspector in doing the Post Graduate Certificate in Veterinary Public Health (2011/2012) and in attending the Better Training for Safer Food course in auditing in 2012, along with release to attend FSAI/Department of Agriculture, Food and the Marine training.

The temporary veterinary inspectors received training organised by County Leitrim in January 2013.

There was limited documented evidence of official controls in non-hygiene areas e.g. food contact materials, additives, allergens etc. This will require further training.

The County Manager, Director of Services, the veterinary inspector and two Sligo county engineers have all 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 onsite 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.**

In the ready-to-eat establishment, the layout and the product flow of the production room does not facilitate good food hygiene practices and may not prevent cross-contamination between the raw and cooked foods.

Gaps in the HACCP-based procedures indicated a need for further training for food business operator.

#### **(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 the manufacturing establishment audited. In particular, the monitoring and verification of CCPs were inadequate. The food business operator had recently introduced a revised HACCP and this was in the process of being implemented prior to the audit.

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

In the ready-to-eat establishment, although a system of traceability was in place, some gaps were noted with the system and these have been identified by the in house quality manager for some time. Similar issues had been identified previously by the county veterinary officer.

Traceability requirements were being complied with in the slaughterhouse.

**The audit team considered the non-compliances present on the day of the audit in the manufacturing establishment were significant given the nature of the product produced at the premises and the potential for cross contamination<sup>3</sup>.**

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<sup>3</sup> Action was taken by the food business operator following the audit.

## **5. CONCLUSIONS**

Sligo County Council supervises four food establishments (and one seasonal poultry plant) 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 closed out. However findings in the one food business operator 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 Sligo 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 local authority veterinary service and/or the FSAI to enhance official controls nationally.

## Annex I: Summary of Onsite Findings

### Food Business Operator 1

Findings related to non-compliance with Food Law	
1.	<p><b>Hand-washing Facilities</b></p> <p><b>Regulation (EC) No 852/2004, Annex II, Chapter I (4)</b>  <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><b>Regulation (EC) No 853/2004, Annex III Section I, Chapter II (4)</b>  <i>The equipment for washing hands used by the staff engaged in handling exposed meat must have taps designed to prevent the spread of contamination.</i></p> <p>A wash-hand basin was located in the entrance area to the production room but the taps were not designed to prevent the spread of contamination and the hot water was too hot to wash hands. Although a SOP was in place to inform staff how to wash hands, it was not sufficient for a high-risk premises and the location of the wash-hand basin was not in a suitably located area to promote good hand-washing practice<sup>4</sup>.</p>
2.	<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 had recently revised the HACCP-based procedures in place. Three CCPs were in place.</p>

<sup>4</sup> Three hand operated sinks were ordered and are now in place.

	<p>CCP 1 - Micro hazard was identified at intake point – the hazard analysis indicated that a subsequent step will not reduce or eliminate the hazard. This does not account for product cooked on-site which could reduce or eliminate micro hazards. The temperature probe used at intake for raw and cooked products was the same probe used for cooked product in the production room (it is noted steri wipes were available)<sup>5</sup>.</p> <p>CCP 2 - Micro hazard was identified if cooking is inadequate. The same probe was used for incoming product, raw product and cooked product. Daily cook/chill record was not fully completed on the production floor on the day of the audit. No sign-off signature on the form to verify the checks. The quality control (part-time) does internal audits to ensure the records are being filled in but doesn't sign off on every sheet as per the in-house procedures.</p> <p>CCP 3 - Micro hazard was identified at the cooling step of the process (&lt; 5°C within two hours). The probe used to determine the chill temperature was also used to determine if the food had reached the core temperature of &lt;5°C (CCP 3). The digital read-out on the chill stated 'defrost' on the day of the audit. It was not possible to ensure the chill temperatures stayed within the range identified in the HACCP manual of 4-9°C.</p> <p>All process steps were identified as low-risk regardless of whether a critical control point was required.</p> <p>One temperature probe was used for raw and cooked foods and the potential for cross-contamination was not identified in the hazard analysis. Steri wipes were available to sanitise the probe before use.</p> <p>Risks/controls associated with washing and re-using the plastic buckets and the storage of buckets was not identified in the HACCP-based procedures.</p> <p>The control of allergens was not identified anywhere in the plant.</p> <p>The supplier list was not fully up-to-date.</p> <p>Some of the forms in use were incomplete, particularly in relation to traceability.</p>
3.	<p><b>Cleaning and Maintenance</b></p> <p><b>Regulation (EC) No 852/2004: Annex II, Chapter I (1)</b> <b><i>Food premises are to be kept clean and maintained in good repair and condition.</i></b></p> <p><b>Regulation (EC) No 852/2004: Annex II, Chapter I (2)</b></p> <ul style="list-style-type: none"> <li><b><i>(a) 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></li> <li><b><i>(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;</i></b></li> <li><b><i>(c) permit good food hygiene practices, including protection against contamination and, in particular, pest control;</i></b></li> </ul> <p>Cleaning records were available and a cleaning programme was in place and implemented. Hygiene deficiencies were noted with chopping boards.</p>

<sup>5</sup> A separate probe was in use in the blast chill and further probes have been put in place for intake and in the ready-to-eat area.

4.	<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 gaps in the implementation of the HACCP-based procedures, e.g. cracking eggs in cooked area, gaps in traceability records, indicate a requirement for further training in particular for the production staff.</p>
5.	<p><b>Traceability</b></p> <p><b>Regulation (EC) No 178/2002, Article 18</b></p> <ol style="list-style-type: none"> <li>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></li> <li>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></li> <li>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></li> <li>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></li> </ol> <p>Of the products reviewed, there was a system of traceability in place, however some gaps were noted with the system and these have been identified by the in-house quality manager for some time.</p> <p>Examples:</p> <ul style="list-style-type: none"> <li>• Chill product, e.g. cream, milk baby spinach, did not have a product label as required by the in-house traceability system</li> <li>• The Process Control Traceability records (13/10/14) – finished product code not completed</li> <li>• Batches of cooked meats identified on the Process Control Traceability record for salads and cooked meats was not completed on the goods inwards documentation Form 01</li> </ul>

6	<p><b>Cleaning and Maintenance</b></p> <p><b>Regulation (EC) No 852/2004, Annex II, Chapter I (2)</b>  <i>The layout, design, construction, siting and size of food premises are to:</i>  <b>(a) 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;</b>  <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>  <b>(c) permit good food hygiene practices, including protection against contamination and, in particular, pest control;</b></p> <p>The layout and the product flow of the production room does not facilitate good food hygiene practices and may not prevent cross-contamination between the raw and cooked foods.</p> <p>Exposed cooked product (chicken) was stored in the chills under the air flow from the refrigeration unit.</p>
7	<p><b>Registration and Approval of Establishments</b></p> <p><b>Article 4 of Regulation (EC) No 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 approval certificate should be reviewed to reflect the operation as ready-to-eat meat products which include fish.</p>
8.	<p><b>Personal Hygiene</b></p> <p><b>Regulation (EC) No 852/2004 Annex II CHAPTER VIII</b>  <b>Personal hygiene</b>  <b>1. Every person working in a food-handling area is to maintain a high degree of personal cleanliness and is to wear suitable, clean and, where necessary, protective clothing.</b></p> <p>There was evidence that the system of controls around protective clothing was insufficient to ensure no cross-contamination. Red and blue colour-coded protective clothing were all held in close proximity in the same small room off the production area.</p>

**Food Business Operator 2**

The slaughterhouse was not in operation on the day of the audit.

Hygiene and maintenance at the premises were satisfactory.

Documentation was reviewed and in order for HACCP and traceability requirements.





Abbey Court,  
Lower Abbey Street,  
Dublin 1.

Advice Line: 1890 336677  
Telephone: +353 1 817 1300  
Facsimile: +353 1 817 1301  
Email: [info@fsai.ie](mailto:info@fsai.ie)  
Website: [www.fsai.ie](http://www.fsai.ie)