

AUDIT
REPORT

Audit of Official Controls
Relating to On Farm
Emergency Slaughtered
Bovine Animals –
Meath County Council

JULY 2013



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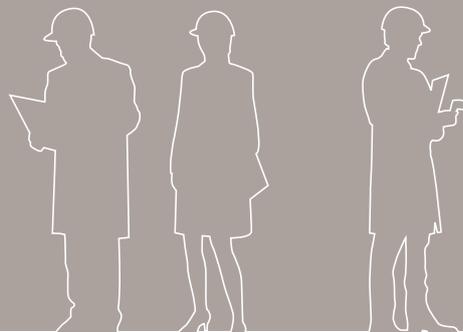


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1. GLOSSARY

AIM	Animal Identification and Movement System
DAFM	Department of Agriculture, Food and the Marine
FSAI	Food Safety Authority of Ireland
NBAS	National Beef Assurance Scheme
SOP	Standard Operating Procedure

2. EXECUTIVE SUMMARY

The Food Safety Authority of Ireland (FSAI) is responsible for the enforcement of all food legislation in Ireland which is carried out through service contracts with official agencies. As part of its legal mandate, the FSAI is required to verify that the system of official controls is working effectively. For the purposes of assessing the delivery of official controls by Meath County Council, this audit was carried out on official controls in relation to on farm emergency slaughter. One food business operator supervised by Meath Co. Council, where acutely injured bovine animals which have been slaughtered on farm are presented to be dressed and cut for human consumption, was also visited.

Meath Co. Council has approved the food business operator visited. The approval includes processing on farm emergency slaughtered animals. The food business operator had been subjected to the risk categorisation process described in SOP (Standard Operating Procedure) D25 of the local authority veterinary service documented procedures and was classified as medium risk. For the records assessed during the audit, the official veterinarian completing official control documentation was not the veterinary practitioner who had deemed the animal fit for human consumption prior to on farm slaughter, thus avoiding a conflict of interest. Meath Co. Council uses SOP A3 regarding official controls specific to the assessment of emergency slaughtered animals. S.I. No. 432 of 2009 ensures veterinary inspectors have legal powers to be able to accomplish their tasks regarding official controls. Reports in the form of a completed checklist were available for all animals assessed during the audit which had been presented for dressing following on farm emergency slaughter. These animals had also been sampled for antibiotics. The results of these samples were all satisfactory.

A declaration by the farmer who reared the animal stating its identity and any medication administered, was available for all animals. There was also a certificate signed by the veterinarian who conducted ante-mortem inspection available for all animals assessed. Records were available that a special identification mark in the form of a diamond shaped stamp with the food business operator approval number was applied to carcass meat. Procedures for boning out carcasses dressed following on farm emergency slaughter have not been adequately documented in the food business operator's food safety management system. Boxes of such meat had a label with the oval identification mark attached to them (which contained a large "E" to indicate that the meat was from an on farm emergency slaughtered animal) rather than a label with a diamond shaped identification mark which is required by legislation. It was verified that the meat from all animals was only placed on the market in the Republic of Ireland.

3. INTRODUCTION

The FSAI is responsible for the enforcement of all food legislation in Ireland, which is carried out through service contracts with official agencies. As part of its legal mandate, the FSAI is required to verify that the system of official controls is working effectively. For the purposes of assessing the delivery of official controls by Meath Co. Council, this audit of official controls was carried out where acutely injured bovine animals which have been slaughtered on farm, are presented to be dressed and cut for human consumption.

The audit consisted of an assessment of official controls in the offices of the local authority followed by a visit to one food business operation supervised by Meath Co. Council where acutely injured bovine animals which have been slaughtered on farm are presented to be dressed and cut for human consumption. The audit was undertaken as part of the planned FSAI programme of audits for 2012. The audit team was accompanied at all times during the on-site activities by representatives from the local authority.

The audit commenced with an assessment of compliance by authorised officers from the local authority with the requirements for official control and food legislation relevant to on farm emergency slaughter. The second part of the audit took place in an establishment with food business operator representatives and proceeded to determine their level of compliance with specific legislation relating to on farm emergency slaughter. This component focused on the documented procedures and related records contained in the food business operator's food safety management system. Closing meetings were held with the food business operator and Meath Co. Council personnel to outline audit findings.

3.1. Audit Objective

The objective of the audit was to verify that effective and appropriate official controls were carried out with respect to food law by Meath Co. Council in circumstances where an acutely injured bovine animal which had been slaughtered on farm and was subsequently presented to be dressed and cut for human consumption. The audit also assessed the food business operator's compliance with food law relating to this activity.

3.2. Audit Scope

The scope of the audit was limited to the assessment of compliance with official control and food legislation specific to on farm emergency slaughter.

3.3. Audit Criteria and Reference Documents

The principal audit criteria that will be referred to during the audit will be:

- [Food Safety Authority of Ireland Act, 1998](#) (S.I. No. 29 of 1998), as amended
- [Service Contract between the FSAI and Meath County Council](#)
- [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
- [Regulation \(EC\) No 852/2004](#) on the hygiene of foodstuffs, as amended
- [Regulation \(EC\) No 853/2004](#) laying down specific hygiene rules for food of animal origin, as amended - particularly, Annex III; Section I; Chapter VI
- [Regulation \(EC\) No 854/2004](#) laying down specific rules for the organisation of official controls on products of animal origin intended for human consumption, as amended – particularly, Annex I; Section I; Chapter II; point 4 & Section II; Chapter V; point 2
- S.I. No. 373 of 2009 – Abattoirs Act, 1988 (Veterinary Examination and Health Mark) (No. 2) Regulations, 2009
- Local authority veterinary service SOP A3 – Revision 3. Emergency Slaughter On Farm
- Animal Welfare Guidelines for Managing Acutely Injured Livestock on Farm (developed by DAFM Farm Animal Welfare Advisory Council) (FAWAC Guidelines)

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 DAFM, and are in accordance with the requirements of Regulation (EC) No 882/2004 (including Article 6.1 of Commission Decision 2006/677/EC) and the FSAI Act.

An information note was developed on the audit and sent to Meath Co. Council to provide relevant local authority staff with initial details of the audit. The evaluation plan was then developed, which provided a more detailed overview of the audit, including audit scope, objectives, criteria and team. The evaluation plan also included the itinerary for on-site activity and confirmed that one food business operator would be visited.

4. AUDIT FINDINGS

4.1. Official Controls performed in accordance with Regulation (EC) No 882/2004

The food business operator visited was selected from data received from the National Beef Assurance Scheme (NBAS) of DAFM. The information received from NBAS is stored on the AIM (Animal Identification and Movement System) database system. AIM is a generic database for multiple animal species and multiple movement types. AIM allows and records the movement of on farm emergency slaughtered animals to a slaughterhouse for dressing. Such animals are entered on the AIM System under a heading "Kill Home Market". Using an extract of information and figures on "Kill Home Market" the approved establishment to be visited as part of the audit was identified. Information on the movement of the on farm emergency slaughtered animals included:

- The holding it was moved from
- The slaughterhouse it was moved to
- The ear tag number of the bovine animal
- Date of slaughter

This information was used as the starting point in the food business operator visited, to assess compliance with official control and food law.

4.1.1 Approval

Article 3 of Regulation (EC) No 854/2004 states that the competent authorities shall approve establishments.

Meath Co. Council has approved one food business operator to process acutely injured bovine animals which have been slaughtered on farm and are presented to be dressed and cut for human consumption.

4.1.2 Risk Categorisation

Article 3 of Regulation (EC) No 882/2004 states that official controls are carried out regularly, on a risk basis and with appropriate frequency, so as to achieve the objectives of this Regulation.

Meath Co. Council uses SOP D25 to determine the risk categorisation of food business operators under the supervision of the local authority. The type of processes undertaken in an establishment and the nature and intended uses of its products, determine to a large extent, the risk to public health from consumption of those products. These factors therefore primarily determine the level of risk associated with the establishment. Using the criteria set out in SOP D25, the risk category allocated to food business operations processing on farm emergency slaughtered animals is "Medium".

4.1.3 Conflict of Interest

Article 4 (2b) of Regulation 882/2004 states that staff carrying out official controls are free from any conflict of interest.

The Farm Animal Welfare Advisory Council guidelines for managing acutely injured livestock on farm requires that the veterinary practitioner who provides certification of an animal for emergency slaughter must, on no account, act as the ante- or post-mortem inspector of that animal at the slaughterhouse.

It is a requirement of Section 7.3 of SOP A3 that a private veterinary practitioner who provides certification of an animal for emergency slaughter must not conduct the post-mortem inspection of that animal at the slaughterhouse.

Records assessed by the audit team for animals which had been slaughtered on farm and presented in the food business operator visited for dressing, had in all cases, been signed by a private veterinary practitioner. This signature certified that such animals were fit for slaughter for human consumption. The audit team also verified that there was no conflict of interest regarding certification of on farm emergency slaughter and post-mortem official controls.

4.1.4 Documented Procedures

Article 8 of Regulation 882/2004 states that competent authorities shall carry out official controls in accordance with documented procedures.

Meath Co. Council uses documented Standard Operating Procedures (SOPs) relating to official controls in food business operations. SOP A3 has been developed to describe official controls specific to the "assessment of emergency slaughtered animals at local authority approved slaughterhouses". The FSAI "Safetynet" is the location where all documented procedures relating to the work of the local authority veterinary service are stored.

Access to Safetynet is available online to Meath Co. Council staff.

Section 9 of SOP A3 requires that the local authority must maintain a dedicated "On Farm Emergency Slaughter" file. At the time of the audit, no dedicated file was maintained by Meath Co. Council.

4.1.5 Staff Performing Official Controls (Training and Competence)

Article 6 of Regulation (EC) No 882/2004 states that the competent authority shall ensure that all of its staff performing official controls receive, for their area of competence, appropriate training enabling them to undertake their duties competently and to carry out official controls in a consistent manner.

The county veterinary officer was familiar with the requirements of EU Regulations specific to on farm emergency slaughter. In addition, they had attended training conducted by DAFM on this subject in June, 2012.

4.1.6 Control and Verification Procedures

Article 4 of Regulation 882/2004 states that competent authorities shall have legal powers to carry out official controls.

DAFM has introduced S.I. No. 432 of 2009 to ensure all veterinary inspectors carrying out official controls have legal powers to be able to accomplish their tasks in general and in particular, on farm emergency slaughter. Staff from Meath Co. Council are authorised under this legislation.

4.1.7 Reports

Article 9 of Regulation 882/2004 states that the competent authority shall draw up reports on the official controls that it has carried out.

Section 9 of SOP A3 details the records and reports to be maintained by Meath Co. Council regarding official controls conducted.

The audit team verified the presence of some information on the file of the food business operator selected for on-site verification.

4.1.8 Sampling and Analysis

Article 11 of Regulation 882/2004 and Annex 1, Section 1, Chapter 2 of Regulation 854/2004 states that the competent authorities sampling and analysis methods used in the context of official controls shall comply with relevant Community rules.

All animals assessed during the audit which had been presented for dressing following on farm emergency slaughter, had been sampled for antibiotics. The results of these samples were all satisfactory. The temporary veterinary inspector will only stamp carcasses of on farm emergency slaughtered animals when these sample results are returned.

4.2. Official Controls Performed in Food Establishments

Information contained on the AIM system of the National Beef Assurance Scheme, indicated that the food business operator visited had taken in and dressed animals which had been slaughtered on farm.

The audit team was advised that a food safety management system based on HACCP principles, as required by Article 5 of Regulation (EC) No 852/2004, was in place in the food business operation visited. The current revision of the SOP Emergency Slaughtered Animals is a direct transcription from the Annex 3 Chapter 4 of Regulation 853/2004. It does not describe the actual practices in place in the food business operation to deal with on farm emergency slaughtered animals.

Records were not available to confirm consultation had taken place in all cases between the private veterinary practitioner and the temporary veterinary inspector prior to on farm emergency slaughter as required by Section 7.3 of the local authority veterinary service SOP A.3. In addition, Section 4 of the SOP Emergency Slaughtered Animals states that, prior to emergency slaughter, the food business operator must contact the temporary veterinary officer in charge. This is not happening in practice.

Food chain information was not available for all animals which had been dressed following on farm emergency slaughter. The details of which were assessed by the audit team.

Procedures for boning out carcasses dressed following on farm emergency slaughter have not been adequately documented in the food business operator's food safety management system. Boxes of such meat had a label with the oval identification mark attached to them (which contained a large "E" to indicate that the meat was from an on farm emergency slaughtered animal) rather than a label with a diamond shaped identification mark which is required by legislation.¹ It was verified that the meat from all animals was only placed on the market in the Republic of Ireland.

5. CONCLUSIONS

Meath Co. Council has in place, a system of official controls for assessing on farm emergency slaughtered bovine animals. To ensure full compliance with official control and food legislation, the system audited requires amendment to incorporate the audit findings listed in the corrective action plan.

Audit findings requiring corrective action are listed in the corrective action plan.

¹ Since the audit, Meath Co Council has indicated to the FSAI that the non-compliance with specific labelling requirements for meat from on farm emergency slaughtered animals, has been corrected.



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