

AUDIT
REPORT

Audit of Official Controls
in Department of Agriculture,
Food and the Marine
Approved Poultry (Broiler)
Processing (Slaughtering)
Establishments

JUNE 2013



AUDIT REPORT

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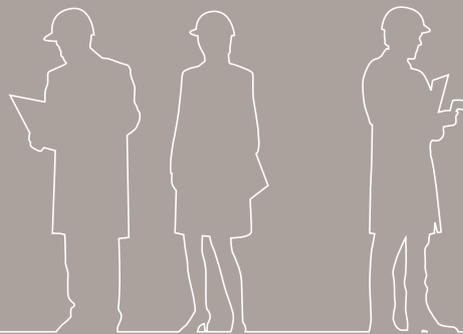


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1. GLOSSARY

FSAI	Food Safety Authority of Ireland
DAFM	Dept of Agriculture Food and Marine
SOP	Standard Operating Procedure
VPN	Veterinary Procedural Notice

2. EXECUTIVE SUMMARY

In accordance with Schedule Five of the Food Safety Authority of Ireland (FSAI) Service Contract, an audit of Dept of Agriculture, Food and the Marine approved poultry (broiler) processing (slaughtering) establishment was carried out. As part of the audit, the organisation, planning, coordination, delivery and review of official controls related to the supervision of approved poultry (broiler) processing (slaughtering) establishments, was carried out and verification was performed at central, regional and local levels within DAFM. Food business operator establishments were also visited as part of the verification of the implementation of official controls at these premises.

The Veterinary Public Health Inspection Service of DAFM is organised at central, regional and local levels in order to deliver official controls and is responsible for the supervision of poultry (broiler) processing (slaughtering) establishments falling within the scope of the FSAI audit.

In general terms, staff numbers, i.e. for the supervision of poultry establishments, had been maintained at local level, in accordance with the DAFM business plan. However, there has been a reduction in staff at the central and regional levels of the organisation.

In terms of planning and coordination of official controls, the audit team confirmed that there was a structured and well organised approach for the prioritisation, planning, coordination and delivery of official controls between the DAFM central, regional and local levels. Evidence was also provided in the form of minutes from meetings attended by official control staff at central, regional and local levels in relation to coordination of official control activities, their prioritisation and also for the review of performance delivery against the DAFM Veterinary Public Health Inspection Service business plan requirements.

The computerised system for management of DAFM documented procedures is the 'e-zone' intranet and is used to provide access, control and updates to SOPs and veterinary procedural notice (VPNs). The audit team confirmed that the poultry standard operating procedure (SOP) and food safety management system SOP (SOP 6 of 2008) were the main procedures used for the performance of veterinary official controls at DAFM approved poultry (broiler) processing (slaughtering) establishments. Operational checks of good hygiene practices and Hazard Analysis and Critical Control Point (HACCP) - based procedures at the establishments were also being carried out by agricultural officers using a number of check-sheets and guidance documents.

The audit team confirmed that the above procedures were in general being followed (subject to a number of exceptions identified), at each of the establishments and DAFM offices visited. Certain deficiencies were also noted in relation to maintaining the e-zone system at central level, and also of a number of DAFM procedures being used. The audit team found that in certain cases a number of procedures were either not on e-zone, were not fully up to date, were in draft format or were obsolete and had not been archived and/or removed from the system. As part of post audit communications by DAFM to the FSAI, the audit team were informed that these points raised were in the process of being addressed at central level.

The main official control inspection duties performed by veterinary inspectors/temporary veterinary inspectors at poultry slaughtering establishments, i.e. which were reviewed as part of the FSAI audit, included checks of food chain information, ante-mortem checks and post-mortem checks.

In general, the audit team confirmed that a system was in place for the performance of official control veterinary inspection tasks which for the most part was in accordance with the poultry SOP requirements and Regulation 854/2004. In certain instances however, a number of inconsistencies and/or deficiencies were observed.

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At the three establishments visited during the audit, agricultural officers assisted the veterinary inspector with inspection tasks. Checks performed by agricultural officers included operational checks of good hygiene practices and HACCP-based procedures in accordance with DAFM guidelines for technical agricultural officers (2007). The audit team was, in general, satisfied with the consistency and effectiveness of the technical agricultural officer/senior agricultural officer controls conducted and their ability to identify and highlight deficiencies at the three establishments audited.

The FSAI audit team confirmed that regular audits were being carried out by DAFM veterinary inspector staff at all three establishments visited, in accordance with SOP 6 of 2008 requirements. For certain establishments, the audit team was in general, satisfied that DAFM audits were effective in identifying weaknesses in the food business operator's food safety management system and operations. In many cases, evidence was also provided where these had been adequately followed up and verified as closed-out during subsequent audits and inspections. A number of exceptions to this were noted during the FSAI audit.

For example, at one establishment visited, due to the lack of specific information recorded on the check sheets used by the veterinary inspector as part of both inspections and audits carried out, the audit team was not able to fully evaluate the effectiveness and thoroughness of the checks performed. The audit team also noted that in the majority of veterinary inspector inspection and audit reports examined in this establishment, the outcome of the DAFM veterinary inspector reports concluded satisfactory compliance by the food business operator, with which the FSAI audit findings did not always fully concur. Post audit correspondence received from DAFM has indicated significant improvements in relations to official controls performed, i.e. for both audits and inspections, which were verified during subsequent regional superintending veterinary inspector checks carried out.

In relation to regional superintending veterinary inspector audits, the audit team confirmed that these were being carried out in accordance with SOP 6 of 2008, for the regions visited. regional superintending veterinary inspector audits involved an assessment of DAFM official controls performed at establishments within the regional superintending veterinary inspector's region. These also included a review of the food safety management system audit performed by the veterinary inspector, enforcement activities carried out at the food business operator establishment (whether any enforcements and/or non compliance notice(s) remained outstanding), food complaints (where applicable) and whether they had been adequately resolved.

The audit team confirmed that official control activities, i.e. in addition to audits and inspections, were being carried out by DAFM at each of the three establishments and included, microbiological sampling for verification with Regulation (EC) No. 2073/2005, and chemical sampling as part of the National Residues Monitoring Programme.

An important element of the DAFM system of controls is that following the identification of non-compliances at the establishment, corrective action reports, i.e. Form No. AR1a, are issued to the food business operator which require corrective action(s) to be carried out in order to address issues highlighted. The audit team noted that in many cases following the identification of non-compliances by both DAFM veterinary inspector and regional superintending veterinary inspector audits, corrective action reports were issued which resulted in the implementation of appropriate corrective action. Additionally evidence was also provided where the checks performed by agricultural officers had also resulted in the issuing of corrective action reports by the veterinary inspector at the establishments audited. In a number of cases however, this was not the case and for one establishment, corrective action reports were not routinely used by the veterinary inspector to highlight and/or correct deficiencies. Post audit correspondence received from DAFM has indicated significant improvements to this situation at this establishment which had been verified during subsequent regional superintending veterinary inspector checks carried out.

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As part of the audit of the food business operator, three food business operations supervised by the DAFM, were visited. The audit team assessed the performance of the controls put in place at the establishment in relation to the implementation of good hygiene practices and principles of HACCP (Hazard Analysis and Critical Control Point) as part of the food business operator's food safety management system and whether these were being adequately maintained and were effective.

The audit team noted that, in general, a detailed food safety management system had been put in place by food business operators at each of the establishments visited in order to comply with the requirements of Article 5 of Regulation (EC) No 852/2004. Although generally fulfilling requirements, certain deficiencies and weaknesses were also identified during the course of the FSAI audits. For one establishment in particular, chronic structural and maintenance deficiencies were observed which did not fully comply with the requirements of Regulations 852/2004 and 853/2004. Post audit correspondence received from DAFM has indicated that a new food business operator is now in charge at this facility, i.e. with new management in place, with a much improved level of compliance.

Detailed individual audit reports were issued to DAFM following the audit of official controls in each region and for each of the establishments visited, which also included related findings for DAFM at central level. This report provides an overall summary of the findings of the entire audit project. Corrective action plans have been received from DAFM since the FSAI audits as part of follow-up undertaken by them to address opportunities for improvement identified. During the FSAI audits the audit team also noted that although many action points from the previous FVO Poultry Mission in 2008 had been closed out a number of remained outstanding.

3. INTRODUCTION

The FSAI is responsible for the enforcement of all 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.

DAFM has entered into a service contract with the FSAI and is responsible for the implementation and enforcement of national and EU legislation as it applies to establishments under their supervision. It is a requirement of the service contract that DAFM shall ensure that official controls are carried out regularly; on a risk basis, and with 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. For the purposes of assessing the delivery of official controls by DAFM at approved poultry (broiler) processing (slaughtering) establishments, this audit focussed on compliance by DAFM with regard to relevant food legislation, adherence to the terms and requirements of the FSAI service contract as well as the assessment of conformance with relevant documented procedures.

The audits in DAFM were undertaken as part of the FSAI's audit programme for 2011/12. This report describes the audit objective, scope, methodology and the findings from the audit.

3.1. Audit Objective

The objective of the audit was to verify the delivery of official controls in approved poultry (broiler) processing (slaughtering) establishments supervised by DAFM. The audit focussed on the organisation, planning, coordination, delivery and review of official controls, related to the supervision of approved poultry (broiler) processing (slaughtering) establishments.

3.2. Audit Scope

FSAI audits of official controls involve verifying compliance by DAFM with regard to relevant legislation, adherence to the FSAI Service Contract and the official agencies own documented procedures (see Section 3.3 for the full range of audit criteria referred to as part of the audit).

The scope of the audit covered the implementation of official controls from live broiler intake to whole chilled broiler carcass at end of primary chilling.

3.3. Audit Criteria and Reference Documents

The principal audit criteria referred to during the audit included the following non exhaustive list:

- [Food Safety Authority of Ireland Act, 1998](#) (S.I. No 29 of 1998), as amended.
- National Control Plan for Ireland 2007-2011 (MANCP)
- DAFM Documented Procedures
- [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
- [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
- [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
- Regulation 3 of S.I. 64/2009: European Communities (Control of Salmonella in Broilers) Regulations 2009
- Commission Regulation (EC) No 646/2007 of 12 June 2007 implementing Regulation (EC) No 2160/2003 of the European Parliament and of the Council as regards a Community target for the reduction of the prevalence of *Salmonella enteritidis* and *Salmonella typhimurium* in broilers and repealing Regulation (EC) No 1091/2005
- S.I. 432/2009: European Communities (Food and Feed Hygiene) Regulations, 2009, as amended.

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 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 official agency ahead of on-site activities. The evaluation plan also included a proposed audit itinerary including timeframes for the conduct of the audit.

Following the issuing of the evaluation plan, the audit team also requested from the official agency, their main procedure(s) used for the performance of official control duties at approved poultry slaughtering establishments. As part of the desktop element of this audit, a review of relevant information held within FSAI was also carried out ahead of on-site activities. This included an evaluation of official control and enforcement data received from DAFM and communicated principally in the form of returns to the FSAI as part of evidence of the official agency's delivery of the FSAI Service Contract requirements.

As part of the assessment of the performance and delivery of official controls by the official agency, the audit consisted of three distinct assessments at DAFM central, regional and local levels of the organisation. Visits also then took place to three large poultry processing (slaughtering) establishments as part of the on-site verification at the food business operator level.

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During the audit of DAFM official controls, the audit team reviewed information and activities relevant to the supervision and performance of official controls at the approved poultry (broiler) processing (slaughtering) establishment with the veterinary inspector and other DAFM staff present. This also involved a review of relevant data, results of official control audits and inspections carried out, sampling activities and analyses, as well as enforcement action(s) conducted and falling within the scope of this audit.

The audit team evaluated whether the official controls were being carried out in accordance with DAFM's own documented procedures and also DAFM's business plan which are used to implement the service contract requirements with the FSAI.

As part of the audit of the food business operations, the audit team assessed the performance of the controls put in place at the establishment 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 whether these were being adequately maintained and were effective.

On completion of the visits to establishments, audit findings relevant to the food business operator were delivered by the FSAI audit team. The food business operator was informed that follow-up in relation to these would be carried out by DAFM and that the FSAI would communicate the audit findings to DAFM following completion of the audit.

In conclusion to the FSAI audit of official controls at each establishment, an initial closing meeting was held with the DAFM veterinary inspector and regional superintending veterinary inspector. At these meetings, the preliminary audit findings were outlined. This allowed official agency personnel an opportunity for any clarification(s) and/or provide additional information relevant to the audit. Following completion of all on-site audits, a final closing meeting was also held with DAFM at central level where findings were discussed in order to allow follow-up in relation to any issues identified.

4. OFFICIAL CONTROLS PERFORMED IN ACCORDANCE WITH REGULATION (EC) NO 882/2004

4.1. Organisation and Structure of Official Controls

The Veterinary Public Health Inspection Service of DAFM is organised at central, regional and local levels in order to deliver official controls and is responsible for the supervision of poultry (broiler) processing (slaughtering) establishments falling within the scope of the FSAI audit.

At central level, the Veterinary Public Health Inspection Service of DAFM coordinates the activities of DAFM official controls through five veterinary public health regions. Each region comes under the responsibility of a superintending veterinary inspector. The five regions are East, North East, South East, South and West. Originally there were 6 regions but following the retirement of one of the regional superintending veterinary inspectors, the sixth region was merged. This has resulted in an increase in the number of establishments and geographical area supervised by the five remaining regional superintending veterinary inspectors.

At poultry establishments, DAFM official control staff, i.e. under the supervision of a permanent veterinary inspector, are required to carry out a range of official duties which include inspections, audits, sampling and other activities as part of the verification of the food business operator's compliance with food law.

The audit team was informed at central level that, in general terms, staff numbers had been maintained at local level, i.e. for the supervision of poultry establishments, in accordance with the DAFM business plan. There had however, been a reduction of staff at the central and regional levels of the organisation, and although a number of senior positions had been recently filled during the timeframe of the FSAI audit, certain positions also remained vacant or had not yet been filled.

During the visits to three establishments selected for audit, the audit team observed that for two of the three premises, a permanent veterinary inspector was present full-time, while for the third, the veterinary inspector's work was split between two establishments. The audit team was satisfied that, in general, sufficient numbers of DAFM staff were available for the performance of official controls at the establishment level.

4.2. Coordination and Planning of Official Controls

The planning and delivery of DAFM official controls at poultry (broiler) processing (slaughtering) establishments is outlined in the Veterinary Public Health Inspection Service business plans, e.g. for 2010 and 2011, which were provided to the FSAI audit team. The audit team confirmed that delivery of requirements specified in the business plan, are assessed on an annual basis by line management.

In terms of planning and coordination of official controls, the audit team confirmed that there was a structured and well organised approach for the prioritisation, planning, coordination and delivery of official controls between DAFM central, regional and local levels. Evidence was also provided in the form of minutes from meetings attended by official control staff at central, regional and local levels in relation to coordination of official control activities, their prioritisation and also for the review of performance delivery against the business plan requirements.

Regional superintending veterinary inspector activities are planned and scheduled in accordance with the requirements of SOP 6 of 2008 where an annual risk assessment is carried out in order to determine the frequency of visits to each establishment and for the review of the delivery of official controls by DAFM staff. The audit team was also informed that regional superintending veterinary inspectors monitor official activities from the "returns" collated by the veterinary inspector at the establishment. This information is sent to DAFM at central level and to the FSAI. The data on performance are utilised by the regional superintending veterinary inspector for planning their visits.

At the establishments the audit team noted the planning and performance of official controls, i.e. inspections and auditing tasks, are carried out by DAFM staff under the supervision of a veterinary inspector, principally to meet the requirements of the DAFM poultry SOP and food safety management system SOP, i.e. SOP 6 of 2008. Official controls were, in general, being scheduled accordingly.

4.3. Description of Official Control System & 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.

Documented procedures used by DAFM include Veterinary Procedural Notices and SOPs, associated checklists and inspection forms. The computerised system for management of DAFM documented procedures is the 'e-zone' intranet and is used to provide access, control, updates to SOPs and VPNS. The audit team verified that the system provided direct access by DAFM staff to procedures and records at central, regional and local levels of the organisation including DAFM offices located at the food business operator establishments.

The audit team confirmed that the poultry SOP and SOP (SOP 6 of 2008) were the main procedures used for the performance of veterinary official controls at DAFM approved poultry (broiler) processing (slaughtering) establishments. Additionally, the following Veterinary Procedural Notices and SOPs were also highlighted as relevant as part of official controls to be carried out and falling within the audit scope:

- Veterinary Procedural Notices X/2010 – Enforcement Procedures at Approved Meat and Dairy Plants
- SOP 13/2011 – Food and Drinking Milk Complaints SOP
- Veterinary Procedural Notices 4/2011 – On Micro Criteria

Operational checks of good hygiene practices and HACCP-based procedures at the establishments were also being carried out by agricultural officers using a number of check-sheets and using guidance document 'General Guidelines for Technical Agricultural Officers' (issue date - 10/07). A Check Sheet Summary Report summarised the daily checks performed, any non-compliances identified and whether these had been resolved.

The audit team confirmed that the above procedures were being followed at each of the establishments visited and DAFM files and records were available demonstrating that the official control checks had been performed.

A number of deficiencies were, however, noted in relation to maintaining the e-zone system and of the procedures used. The audit team found that, in certain cases, a number of procedures were either not on the system itself, e.g. the poultry SOP, were not fully up-to-date, were in draft format, e.g. the enforcement procedure, or were obsolete and had not been archived and/or removed from the system¹.

At the final closing meeting, the audit team was informed by DAFM that a veterinary inspector resource would soon be available at central level and would be allocated the task of updating and maintaining procedures relevant to official controls to be performed at poultry supervised establishments. Subsequent to the FSAI audit, the audit team was informed that this resource had been put in place.

¹ In follow up correspondence received from DAFM since the FSAI audit, the FSAI has been informed that a full review of DAFM poultry procedures is taking place at central level. A commitment has been provided that draft procedures will be finalised, procedures will be updated where necessary, all relevant procedures will be available on the e-zone and any obsolete procedures will be archived.

4.4. Performance of Official Controls

4.4.1 Official Control Veterinary Inspection Tasks

The main official control tasks performed by veterinary inspectors at poultry slaughtering establishments which were reviewed as part of the audit included inspections of food chain information were ante-mortem and post-mortem checks.

The FSAI audit team confirmed that regular inspections were being carried out by DAFM at the three food business operator establishments visited. The audit team confirmed that, in general, the appropriate verification checks of the relevant food chain information were being carried out by the veterinary inspector/temporary veterinary inspector in accordance with the requirements of Regulation (EC) No. 854/2004 and the poultry SOP. In a number of cases however, certain deficiencies were also observed (which were the exception rather than the norm) in relation to incomplete food chain information accepted by both the food business operator and DAFM staff at the establishments audited. Post audit information was received from DAFM where follow-up actions were taken by them as part of the process to remedy and correct deficiencies highlighted above which, in their view, have now been addressed.

Additionally during the FSAI audit, specific examples were also provided to the audit team of previous action taken by DAFM at a number of establishments following the detection of non-compliances relating to incomplete food chain information which, in a number of cases, involved written communications to the relevant stakeholders stipulating that slaughter of poultry could not take place without the provision of relevant and complete food chain information.

In general, the audit team was satisfied that a system was in place to ensure that birds were not killed without undergoing the required ante-mortem veterinary checks. Evidence was also provided during the audit of enforcement action taken by DAFM in follow-up to certain deficiencies highlighted at an ante-mortem inspection.

In a number of cases (which were the exception rather than the norm), certain deficiencies however, were observed. These included, for example, in one instance, the failure to record excessive dead on arrivals at ante-mortem inspection, no documented system for the communication of ante-mortem inspection results to the post-mortem inspector and inadequate facilities for conducting ante-mortem examinations.^{2,3}

In relation to post-mortem inspections, the audit team was satisfied that, in general, a system was in place to ensure that birds underwent the required veterinary checks (subject however to a number of deficiencies identified during the audit). For example, the slaughtering line speed for one establishment of 12,000 birds per hour, i.e. with only one temporary veterinary inspector present, was in operation at the time of the FSAI audit⁴. Others deficiencies (which were the exception rather than the norm) included for example one instance, where the veterinary inspector had to turn with their back to the slaughtering line⁵ in order to complete the post-mortem records. Others included the wearing of inappropriate protective clothing⁶ during inspections, the re-entering of

² FSAI Comment: the lack of adequate ante-mortem inspection facilities had also been highlighted by an FVO inspection in report in 2008 and also a DAFM IAU report. Despite a Compliance Notice being issued the finding remained outstanding at the time of the FSAI audit in 2012 and the food business operator also built a maintenance workshop in this area without permission.

³ DAFM Update: Post audit communications received from DAFM state that adequate lighting has now been installed and the maintenance workshop has been removed (12.04.12)

⁴ FSAI Comment: A line speed of 10,000 birds per hour for one temporary veterinary inspector had been considered as too high in order to complete a proper inspection, by a previous FVO mission report in 2008. This recommendation had also been identified as outstanding by a previous DAFM internal audit carried out in 2010.

⁵ DAFM Update: A new evisceration line has been installed in the plant and a stand has been installed that allows the post-mortem inspector complete paperwork while having birds in view.

⁶ FSAI Comment: i.e. the wearing of a *hi-visibility jacket* in the evisceration room.

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production areas following ante-mortem inspections performed in the lairage area without changing clothing, and the lack of recording of certain information by a temporary veterinary inspector on the post-mortem inspection record in one instance observed.

The audit team noted some variation in the relation to the submission of poultry for further examinations (following issues identified at post-mortem inspection), between the three establishments. For one establishment, this was carried out strictly in accordance with the requirements of the poultry SOP and Section IV, Chapter 5 (B) of Annex I Regulation 854/2004 whilst for another establishment, this was not entirely the case.

In relation to the communication of inspection results, the audit team noted that generally where inspections revealed the presence of diseases, conditions or other matters, the veterinary inspectors at the establishments took steps to inform the food business operator, primary producer, private veterinary practitioner, and the DAFM animal health section. In the case of one establishment however, certain deficiencies were observed by the audit team regarding the communication of results regarding higher than expected rates of condemnation.

Consequently, although there was a system in place for the performance of official control veterinary inspection tasks which for the most part was in accordance with the poultry SOP requirements and Regulation 854/2004, in certain instances, a number of inconsistencies and/or deficiencies were observed when comparing the system in operation at the three establishments audited.

4.4.2 Official Control Inspection Tasks - Technical/Senior Agricultural Officers (TAOs/SAOs)

At the three establishments visited during the audit, agricultural officers, i.e. technical agricultural officers or a senior agricultural officer, assisted the veterinary inspector with inspection tasks. Checks performed included operational checks of good hygiene practices and HACCP-based procedures in accordance with DAFM requirements. The audit team verified that check-sheets used were being filled out in a detailed manner as part of the recording official controls conducted by which allowed the audit team to verify the checks performed.

A Check Sheet Summary Report was also being issued by senior agricultural officers/technical agricultural officers to the veterinary inspector at the establishments visited, summarising the daily checks performed and their results, which included any non-compliances identified and whether they had been closed out. At two of the establishments, the audit team viewed examples where action was taken by the veterinary inspector on the basis of non-compliances identified by technical agricultural officers/senior agricultural officer and where the food business operator was required to take appropriate corrective action. This was achieved using DAFM form Ar1a corrective action report to prompt the food business operator to remedy issues identified. At another establishment audited however, this was not the case for deficiencies identified⁷ during senior agricultural officer checks and consequently, the approach to closeout certain non compliances somewhat varied between the establishments visited.

In general, the audit team was satisfied with the consistency and effectiveness of the technical agricultural officer/senior agricultural officer controls conducted and their ability to identify and highlight deficiencies at the three establishments audited and within their scope of responsibilities.

⁷ DAFM Update: Post audit communications received from DAFM have indicated that the issuing of corrective action reports has been reviewed at this establishment, where currently ongoing corrective actions and monitoring of the food safety management system have lead to improvements and where SAO and temporary veterinary inspector checks are now incorporated which was verified by the RSVI (13.7.12).

4.4.3 Auditing Tasks

The following auditing checks are required to be carried out by DAFM veterinary inspectors at each of the poultry establishments audited in accordance with DAFM SOP 6 of 2008 requirements:

- A full food safety management system, i.e. food safety management system audit -
- Quarterly evaluation of the food business operator's Critical Control Point (CCP) checks
- Evaluation of Group I HPRs, i.e. HACCP Pre-requisites, every 3 months and
- Evaluation of Group II HPRs within a 12 months period

The audit team confirmed that a food safety management system audit of the food business operator's HACCP-based procedures had been carried out by DAFM veterinary inspectors at each of the three establishments, and that in general, verification of the food business operator's monitoring of their CCPs was being carried out at the required frequency, i.e. once every 3 months, as prescribed by SOP 6 of 2008.

In accordance with SOP 6 of 2008 requirements, the audit team confirmed that, in general, Group I HPRs were being evaluated, i.e. within every 3 months, and similarly, Group II HPRs were for the most part, being completed within 12 months at each of the establishments (subject to a number of exceptions identified during the audits conducted).

Group I HPRs include verification of aspects such as pre-operational sanitation of equipment and food contact surfaces, operational sanitation/hygiene, microbiological testing and temperature control.

Group II HPRs include verification of aspects such as the food business operator's structural and equipment maintenance programme, water storage and treatment, raw material intake, traceability and staff hygiene.

A number of deficiencies were however noted in relation to HPR 1 microbiological checks to be performed in two of the establishments audited. Although certain micro checks had been carried out as part of the requirements of SOP 6 of 2008, the DAFM VPN 4 checklist had not been used for the verification of the food business operator's compliance with Regulation (EC) No 2073/2005⁸ which was not in full compliance with DAFM procedures.

In relation to the Group II operational checks performed, although these mostly had been carried out at the required frequency in accordance with SOP 6 of 2008 requirements, the audit team also found some variation in the effectiveness of a number of these HPR checks performed, i.e. in relation to fulfilment of SOP 8 of 2008 requirements and also as reflected by the evaluation of the food business operator's level of compliance on the day of the audits.

For example, at one establishment, there were no records of the veterinary inspector HPR II checks of the food business operator's structural and equipment maintenance programme carried out for 2011⁹. For another establishment, DAFM audits of the establishment had not highlighted deficiencies in the food business operator's preventative maintenance procedures in operation¹⁰. (The audit team confirmed however, that DAFM audits at this establishment had routinely identified ongoing structural maintenance issues which had also been communicated to the food business operator's management).

⁸ DAFM Update: Post audit communications received from DAFM have indicated that veterinary inspector checks at both establishments now include the use of the VPN 4 checklists which have been verified by RSVI checks carried out (13.7.12).

⁹ DAFM Update: Post audit communications received from DAFM have indicated that this has been addressed for 2012 and that records of HPR II veterinary inspector checks have been verified by RSVI checks carried out (13.7.12).

¹⁰ DAFM Update: Post audit communications received from DAFM have indicated that a new preventative maintenance is now in operation at this establishment which has also been verified by RSVI checks carried out (17.7.12).

Audit of Official Controls in Department of Agriculture, Food and the Marine Approved Poultry (Broiler) Processing (Slaughtering) Establishments

JUNE 2013

The FSAI audit team confirmed that regular audits were being carried out by DAFM at all three establishments visited, in accordance with SOP 6 of 2008 requirements. For certain establishments the audit team were in general satisfied that DAFM audits were effective in identifying weaknesses in the food business operator's food safety management system and operations. In many cases, evidence was also provided where these had been adequately followed up and verified as closed out during subsequent audits and inspections. (A number of exceptions to this were noted however during the FSAI audit. See section 5.6).

In relation to another establishment however, in general, due to the lack of specific information recorded on the check sheets used by the veterinary inspector as part of both inspections and audits carried out, the audit team were not able to fully evaluate the effectiveness and thoroughness of the checks performed as they were not entirely auditable and consequently verifiable. The audit team also noted that in the majority of veterinary inspector inspection and audit reports examined during the FSAI audit, the outcome of the DAFM veterinary inspector reports concluded satisfactory compliance by the food business operator which did not fully concur with the FSAI audit findings for the establishment¹¹.

Regarding regional superintending veterinary inspector audits in the two regions visited, the audit team confirmed that these were in general being carried out in accordance with SOP 6 of 2008. These involved an assessment of DAFM official controls performed at establishments within the regional superintending veterinary inspector's region. These also included a review of the food safety management system audit performed by the veterinary inspector, enforcement activities performed at the premises (whether any enforcements and/or non compliance notice(s) remain outstanding), food complaints (where applicable) and whether they had been adequately resolved.

4.5. Additional Official Controls Performed, e.g. Microbiological and Chemical Sampling

The audit team confirmed that official control activities, i.e. in addition to audits and inspections, were being carried out by DAFM at each of the three establishments and included, microbiological sampling for verification with Regulation (EC) No. 2073/2005, and chemical sampling as part of the National Residues Monitoring Programme.

In relation to microbiological testing for *Salmonella* and *Campylobacter*, these were being carried out as part of DAFM's National Surveillance Programme. The audit team was provided with sampling plans drawn up by the veterinary inspector at each of the premises visited in order to deliver the national programme requirements. The audit team confirmed that sampling was being carried out in accordance with these schedules for the examples selected for verification during the audit.

Although not reviewed in detail, the audit team noted that official sampling for water potability was taking place by DAFM at each of the establishment visited. These samples were used to verify of the food business operator's own checks performed. For samples reviewed where unsatisfactory results had occurred, the audit team confirmed that follow-up action and further testing had taken place in accordance with poultry SOP requirements.

Records relating to chemical sampling carried out in accordance with the National Residue Monitoring Programme were also provided to the audit team as confirmation of DAFM's fulfilment of the National Residue Monitoring Programme requirements at the establishment. These were not reviewed in detail by the audit team.

¹¹ DAFM Update: Post audit communications received from DAFM have shown that improvements have been made in relation to the identification of deficiencies, their recording and evidence of corrective action reports issued by DAFM during audits and inspections at this establishment which have been verified during RSVI checks (13.7.12).

4.6. Non-compliances, Follow-up, Enforcement Action, Complaints, Incidents and Alerts

Non-compliances, Follow-up and Enforcement

An important element of the DAFM system of controls is that following the identification of non-compliances at the establishment corrective action reports, i.e. Form No. AR1a, are issued to the food business operator which require corrective action(s) to be carried out in order to address issues highlighted/identified.

The audit team noted that in many cases, following the identification of non-compliances by both DAFM veterinary inspector and regional superintending veterinary inspector audits, corrective action reports were issued which resulted in the implementation of appropriate corrective action. Additionally, evidence was also provided where the checks performed by senior agricultural officers or technical agricultural officers had also resulted in the issuing of corrective action reports by the veterinary inspector at the establishments audited. This was not the case for all establishments audited however. For one establishment, corrective action reports were not routinely issued by the veterinary inspector, to correct non compliances identified following inspections or audits, and also to correct deficiencies highlighted as part of the senior agricultural officer checks carried out¹².

For another establishment, non-compliances were routinely identified and numerous corrective action reports had been issued by DAFM, e.g. seventeen corrective action reports had been issued in 2011. In many cases, the audit team were provided with evidence that these had been adequately addressed, which had also been verified by DAFM. In some cases however, certain non-compliances reoccurred. In other cases, especially in relation to chronic structural and maintenance issues, many of these had only been partially addressed or were still outstanding.¹³

The audit team also reviewed compliance notices issued by DAFM in accordance with S.I. 432 of 2009 (and also the preceding Statutory Instrument – S.I. 910 of 2005) - between 2009 –2011 in order to correct issues at the three establishments visited during the FSAI audit.

The audit team note that although enforcement notices were issued by DAFM at certain establishments visited, they were not in all cases effective at remedying certain deficiencies identified.

Complaints

The audit team selected a number of food complaints that had arisen in 2011 for two establishments and evaluated whether DAFM's own procedures were being followed and whether the complaints had been adequately dealt with by the food business operator. The audit team confirmed that DAFM had adhered to their SOP 13/2011 (i.e. the Food and Drinking Milk Complaints SOP) in dealing with both complaints and that detailed records had been kept on file. These included details of the food business operator's investigation of the complaint itself and of the associated verification, follow up and closeout by DAFM.

Incidents/Rapid Alerts

The audit team was informed that no incidents or rapid alerts had occurred at the establishments visited during 2010-2011.

¹² DAFM Update: Post audit communications received from DAFM have indicated that the issuing of corrective action reports has been reviewed at this establishment, where currently ongoing corrective actions and monitoring of the food safety management system have led to improvements and where SAO and temporary veterinary inspector checks are now incorporated which was verified by the RSVI (13.7.12).

¹³ DAFM Update: Post audit communications received from DAFM have indicated that increased enforcement action has taken place at this establishment resulting in the closing down of areas and activities in the plant and improved compliance by the food business operator. A new food business operator is now in place with new management since December 2012 ,and reportedly the plant is much improved with a better record of compliance according to DAFM correspondence

4.7. Recording and Submission of Official Control 'Returns'

The audit team was provided with evidence of the recording of official controls carried out at each of the establishments in the form of 'Returns' and which were being submitted both internally to DAFM, e.g. to the regional superintending veterinary inspector, as part of DAFM procedures and also included the forwarding of data to the FSAI, in accordance with the requirements of the service contract.

4.8. Staff Performing Official Controls

Article 6 of Regulation (EC) No 882/2004 requires 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. Training of DAFM staff was discussed during the visit to the establishment, however details were not reviewed in depth by the audit team.

5. FOOD BUSINESS OPERATOR CONTROLS PERFORMED IN ACCORDANCE WITH REGULATIONS 178/2002, 852/2004 & 853/2004 AND S.I. 432/2009

As part of the audit of the food business operations, the audit team assessed the performance of the controls put in place at the establishment 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 whether these were being adequately maintained and were effective.

An assessment was made under the following headings:

- Food business operator operations/activities at the establishment
- Documented food safety management system based on the Principles of HACCP (including procedures and records)
- Structure, maintenance & operational hygiene

The audit team noted that in general, a detailed food safety management system had been put in place by food business operators at each of the establishments visited in order to comply with the requirements of article 5 of Regulation (EC) No 852/2004. Although generally in compliance, the audit team noted certain deficiencies and weaknesses which were highlighted during the course of the audit. For one establishment in particular, chronic structural and maintenance deficiencies were observed which did not fully comply with the requirements of Regulations 852/2004 and 853/2004. Many of these had also been highlighted in previous DAFM audits of this establishment.

Following the FSAI audit, correspondence was provided by DAFM of corrective actions taken to remedy deficiencies highlighted at each of the food business operator establishments audited, which in their view have largely been addressed.

6. CONCLUSIONS

The audit team confirmed that there was a structured and well organised approach for the prioritisation, planning, coordination and delivery of official controls between the DAFM central, regional and local levels. Whilst in general DAFM official controls were being carried out satisfactorily at the three establishments visited, certain opportunities for improvement were identified in relation to the inspections and audits conducted in relation to the closeout of deficiencies identified. The audit team found evidence where the poultry SOP was being more strictly followed at two of the establishments visited regarding inspection tasks and follow up to be carried out which demonstrated a variation in the consistency and effectiveness of these official controls between the three establishments audited.

The audit team noted that in general, detailed food safety management system had been put in place by food business operators at each of the establishments visited in order to comply with the requirements of article 5 of Regulation (EC) No 852/2004. Although generally in compliance, the audit team noted a certain number of opportunities for improvement which were highlighted during the course of the audit. For one establishment in particular, chronic structural and maintenance deficiencies were observed which did not fully comply with the requirements of Regulations 852/2004 and 853/2004. Post audit correspondence received from DAFM has indicated that a new food business operator is now in place at this establishment, with new management in place, and reportedly from DAFM, there is a much improved level of compliance.

The findings identified during this audit should be disseminated nationally to ensure that corrective actions and opportunities for improvement identified are implemented across all regions.

7. AUDIT FINDINGS REQUIRING CORRECTIVE ACTION

Following the FSAI audit, detailed follow-up has been provided by DAFM of corrective actions taken to remedy deficiencies highlighted in the FSAI individual audit reports for each of the DAFM regions and food business operator establishments audited and also those relating to DAFM at central level.



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