

AUDIT
REPORT

Official Control Audit Relating
to On Farm Emergency
Slaughtered Bovine Animals
– Department of Agriculture,
Food and the Marine

DECEMBER 2012



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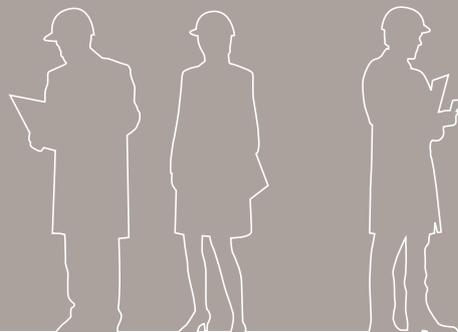


Table of Contents

1.	GLOSSARY	2
2.	EXECUTIVE SUMMARY	3
3.	INTRODUCTION.....	4
	3.1. Audit Objective	4
	3.2. Audit Scope	4
	3.3. Audit Criteria and Reference Documents	5
	3.4. Audit Methodology	5
4.	CONTROLS PERFORMED IN ACCORDANCE WITH REGULATION 882/2004.....	6
	4.1. Approval	6
	4.2. Risk Categorisation	6
	4.3. Conflict of Interest.....	7
	4.4. Documented Procedures.....	7
	4.5. Staff Performing Official Controls (Training and Competence)	7
	4.6. Control and Verification Procedures.....	8
	4.7. Reports	8
	4.8. Sampling and Analysis	8
5.	FOOD BUSINESS OPERATOR CONTROLS PERFORMED IN ACCORDANCE WITH REGULATIONS 178/2002, 852/2004 & 853/2004 AND STATUTORY INSTRUMENT 432/2009.....	9
6.	CONCLUSIONS.....	9
7.	RECOMMENDATIONS.....	10

1. GLOSSARY

AIM	Animal Identification and Movement System
FSAI	Food Safety Authority of Ireland
DAFM	Dept of Agriculture Food and the Marine
FBO	Food Business Operator
OV	Official Veterinarian
TVI	Temporary Veterinary Inspector
SOP	Standard Operating Procedure
VPN	Veterinary Procedural Notice
OFS	On Farm Slaughter Checksheet
NBAS	National Beef Assurance Scheme
PVP	Private Veterinary Practitioner

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 the Department of Agriculture, Food and the Marine (DAFM) this audit was carried out on official controls in relation to on farm emergency slaughter. Two food business operations (FBOs) supervised by the Department, where acutely injured bovine animals which have been slaughtered on farm are presented to be dressed and cut for human consumption, were audited.

DAFM have approved the two food business operations visited. The approval includes processing on farm emergency slaughtered animals. The two FBOs had been subjected to the risk categorisation process described in SOP 6/2006 and were both classified as low risk. For the records assessed during the audit, the Official Veterinarian (OV) or Temporary Veterinary Inspector (TVI) completing official control documentation was not the veterinary practitioner who had deemed the animal fit for consumption prior to on farm slaughter thus avoiding a conflict of interest. DAFM have documented in Veterinary Procedure Notice VPN 11/2009 official controls specific to the assessment of emergency slaughtered animals. SI 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.

All animals, for which records were examined, arrived in the food business operation within 2 hours of slaughter. 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 health mark in the form of a diamond shaped stamp with the FBO approval number was applied to carcass meat or a similar label was attached to boxed meat. It was verified that the meat from all animals was only placed on the market in the Republic of Ireland.

3. INTRODUCTION

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 the Department of Agriculture Food and the Marine (DAFM) this audit of official controls where acutely injured bovine animals which have been slaughtered on farm are presented to be dressed and cut for human consumption was carried out.

The audit consisted of visits to two food business operations supervised by DAFM 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 for 2012. The audit team were accompanied at all times during the on-site activities by representatives from DAFM.

The audit was conducted over two days during the week commencing July 16th 2012. It commenced with an opening meeting on the premises of each of the two selected food business operations with the DAFM Veterinary Public Health personnel responsible their supervision. This was followed by an assessment of compliance by DAFM staff with the requirements for official control and food legislation relevant to on farm emergency slaughter. The second part of the audit commenced with an opening meeting with food business operator (FBO) 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 FBO's food safety management systems. Closing meetings were held with DAFM and FBO personnel to outline audit findings.

A final closing meeting was held on August 1st 2012 in Agriculture House to outline the overall findings of the audit to personnel from DAFM Headquarters.

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 DAFM 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 operators' 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:

- [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;
- SI 373 of 2009 – Abattoirs Act 1988 (Veterinary Examination and Health Mark) (No. 2) Regulations 2009;
- DAFM Trader Notice(s);
- DAFM Standard Operating Procedures (SOPs);
- DAFM Veterinary Procedural Notices (VPNs);
- Animal Welfare Guidelines for Managing Acutely Injured Livestock on Farm. (Developed by the 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 DAFM to provide the Department 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 the two selected FBOs to be visited.

4. CONTROLS PERFORMED IN ACCORDANCE WITH REGULATION 882/2004

The FBOs visited were selected from data received from the National Beef Assurance Scheme (NBAS) of DAFM. The information received from NBAS is stored on the AIM 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 (Animal Identification and Movement System) under a heading “Kill Home Market”. Using an extract of information and figures on “Kill Home Market” the approved premises to be visited as part of the audit were identified. Information on the movement of the on farm emergency slaughtered animal 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 each FBO visited to assess compliance with official control and food law.

4.1. Approval

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

DAFM have approved the two food business operations visited for the slaughter of bovine animals, cutting bovine/porcine/ovine animals and the cold storage of bovine/ovine/porcine products. This approval includes processing on farm emergency slaughtered animals.

4.2. 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.

DAFM have in place a process in SOP 6/2008 which determines the risk categorisation of food business operations.

The two FBOs visited during the audit had been subjected to the risk categorisation process described in SOP 8/2006 and were both classified as Low risk.

4.3. 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.

Records assessed by the audit team for animals which had been slaughtered on farm and presented to the two FBOs visited for dressing had in all cases been signed by a Veterinary Practitioner. This signature certified that such animals were fit for slaughter for human consumption.

VPN 11/2009 states that if the Official Veterinarian or Temporary Veterinary Inspector deems the carcass is fit for dressing that an On Farm Slaughter Check Sheet (OFS1) is completed. For the records assessed the OV or TVI completing the OFS 1 was not the veterinary practitioner who had deemed the animal fit for consumption prior to on farm slaughter.

4.4. Documented Procedures

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

DAFM have documented in a series of Standard Operating Procedures (SOP) and Veterinary Procedure Notices (VPN) procedures relating to official controls in food business operations. VPN 11/2009 has been developed to describe official controls specific to the “assessment of emergency slaughtered animals at DAFM approved slaughterhouses”. The DAFM “E Zone” system was accessed and the correct revision of VPN 11/2009 was available to the veterinary public health staff.

VPN 11/2009 does not provide guidance to VIs on the definition of “acutely injured animal”. It also refers to SI 910 of 2005. This statutory instrument has been replaced by SI 432/2009.

In addition to VPN 11/2009 DAFM staff had copies of the Animal Welfare Guidelines for Managing Acutely Injured Livestock on Farm. However the Veterinary Certificate in Appendix III of the FAWAC Guidelines does not make it clear that the veterinary practitioner completing ante mortem examination must include their clinical findings or description of the acute accident on the document.

4.5. 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.

All DAFM veterinary public health staff were familiar with the requirements of EU Regulations specific to on farm emergency slaughter. In addition, DAFM conducted training on this subject in June 2012 and records were available to confirm the attendance of the VIs in the two FBOs visited at this training.

4.6. Control and Verification Procedures

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

DAFM have introduced SI 432 of 2009 to ensure veterinary inspectors have legal powers to be able to accomplish their tasks regarding official controls in general and in particular to on farm emergency slaughter.

4.7. 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.

VPN 11/2009 includes a requirement that “In advance of the arrival of an on farm slaughter at the slaughterhouse, the Private Veterinary Practitioner (PVP) is obliged to contact the OV at the slaughterhouse to inform them of the proposed arrival of an emergency slaughter animal”. Appended to VPN 11/2009 is the OFS 1 checksheet. This checksheet was completed for all animals assessed during the audit which had been presented for dressing following on farm emergency slaughter. However the current revision of the checksheet does not require that the Veterinary Inspector (VI) records that contact has been made by a private practitioner regarding an animal he/she wishes to send to the food business operation for dressing following on farm emergency slaughter.

4.8. 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.

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

Two food business operations were visited, which from information contained on the AIM system of the National Beef Assurance Scheme indicated they had taken in and dressed animals which had been slaughtered on farm.

VPN 11/2009 details the manner in which official controls are conducted by DAFM and how the specific requirements of Annex III, Section 1 of Chapter 6 of Regulation 853/2004 relating to on farm emergency slaughtered animals are complied with by relevant FBOs.

Food safety management systems based on HACCP principles, as required by Article 5 of Regulation (EC) No. 852/2004, were in place in both FBOs. SOPs describing procedures followed when an on farm emergency slaughtered animal is presented for dressing had been included in both food safety management systems. However these SOPs did not fully describe all the procedures followed when dealing with on farm emergency slaughtered animals.

Records retained as part of the food safety management systems by the two food business operators verified that animals which had been slaughtered on farm had been entered on the AIM system as “Kill Home Market”. The FBOs had put in place documented procedures as part of their food safety management system describing how bovine and ovine carcasses are identified and traceable. For the animals assessed as part of the audit it was verified that traceability, as required by Article 18 of Regulation 178/2002, could be established from the animal’s ear tag to a carcase number or boxed meat.

Specific VPN 11/2009 requirements were assessed for a selected number of animals in each FBO visited:

- All animals arrived in the food business operation within 2 hours of slaughter.
- A declaration by the farmer who reared the animal stating its identity and any medication administered was available for all animals.
- A certificate signed by the veterinarian who conducted ante-mortem inspection was available for all animals assessed.
- Records were available that a special health mark in the form of a diamond shaped stamp with the FBO approval number was applied to carcase meat or a similar label was attached to boxed meat.
- It was verified that the meat from all animals was only placed on the market in the Republic of Ireland.

6. CONCLUSIONS

DAFM have in place a system of official controls for assessing on farm emergency slaughtered bovine animals. The system audited was found in general to be in compliance with official control and food legislation but requires amendment to incorporate the recommendations set out in Section 7.

7. RECOMMENDATIONS

- 7.1 VPN 11/2009 should be amended to provide guidance to VIs on the definition of “acutely injured animal” and refer to SI 432 of 2009 rather than SI 910/2005.
- 7.2 The veterinary practitioner completing the Veterinary Certificate in Appendix III of Farm Advisory Committee Guidelines following ante mortem examination should include clinical findings or description of the acute accident on the document.
- 7.3 The current revision of the checklist appended to VPN 11/2009 should require the VI to record that contact has been made by a private practitioner regarding an animal he/she wishes to send to the food business operation for dressing following on farm emergency slaughter.
- 7.4 The SOPs in both FBOs visited should fully describe all the procedures in place for dealing with on farm emergency slaughtered animals presented for dressing.



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