



SUMMARY REPORT

Food Safety Authority of Ireland and Food Standards Agency in Northern Ireland Joint Traceability Audit

**Compliance with the requirements of Article 18 of Regulation (EC) No.
178/2002 with respect to traceability by selected Food Business
Operators on the island of Ireland**

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1.0 EXECUTIVE SUMMARY

- 1.1 The executive management of the Food Standards Agency in Northern Ireland (FSA in NI) and the Food Safety Authority of Ireland (FSAI) requested that a targeted audit be carried out to determine the level of compliance with the requirements of Article 18 of Regulation (EC) No. 178/2002 with respect to traceability by selected food business operators in both jurisdictions.
- 1.2 The scope of the audit was to trace composite products containing food of animal origin which was sourced in one jurisdiction but produced or manufactured in the other.
- 1.3 The primary objective of the audit was to verify compliance by food business operators, in both jurisdictions, responsible for the manufacture, processing, or distribution of the selected products with the traceability requirements set out in Article 18 of Regulation (EC) No. 178/2002.
- 1.4 The NI Assembly Agriculture and Rural Development (ARD) committee recommended that the Memorandum of Understanding (MoU) between FSAI and FSA in NI should be tested to 'ensure that there was a consistent and joined up approach to cross border alerts'. The audit teams in both FSAI and FSA in NI worked closely throughout the planning, execution, and reporting of the joint traceability audit.
- 1.5 All 14 of the food business operators visited, in Northern Ireland and the Republic of Ireland, during the joint traceability audit were in a position to provide information to audit teams on the businesses:
 - To which they provided products or ingredients
 - From which they were supplied with a product or ingredients

2.0 INTRODUCTION

2.1 Reason for the Audit

- 2.1.1 The dioxin incident in December 2008 resulted in a large scale recall of pork products throughout the island of Ireland. This resulted in a significant exchange of information between authorities in the Republic of Ireland and Northern Ireland, particularly in relation to tracing and recalling affected feed and pork products associated with the incident.
- 2.1.2 The ARD committee of the Northern Ireland Assembly carried out an inquiry into the dioxin incident in December 2008. As part of that inquiry the ARD committee took evidence from the FSA in NI in September 2009 and FSAI in October 2009.
- 2.1.3 In the Republic of Ireland in the immediate aftermath of the dioxin contamination of pork and beef in December 2008, the Minister of Agriculture, Fisheries and Food established an inter agency review group to carry out a complete review of and report on all aspects relevant to the incident. The Joint Oireachtas Committee on Agriculture, Fisheries and Food conducted a separate enquiry and the Minister indicated that the recommendations arising from the Oireachtas Committee would be considered by this Review Group.
- 2.1.4 One of the recommendations made by the ARD committee was that the Agreement¹ between FSAI and FSA in NI be tested to '*ensure that there was a consistent and joined up approach to cross border alerts*'.
- 2.1.5 To address this recommendation the FSA in NI gave a commitment to carry out a joint FSA in NI / FSAI food product traceability exercise. The executive management of the FSA in NI and the FSAI agreed that a targeted audit be carried out to determine the level of compliance with the requirements of Article 18 of Regulation (EC) No. 178/2002² with respect to traceability by selected food business operators (FBOs) in both jurisdictions.

2.2 Scope and objectives of the audit

- 2.2.1 The scope of the audit was to trace composite products containing food of animal origin which were on sale to the final consumer in one jurisdiction but produced or manufactured in the other. A composite product is defined in European Union (EU) legislation as a foodstuff intended for human consumption that contains both processed products of animal origin and products of plant origin.
- 2.2.2 The primary objective of the audit was to verify compliance by food business operators, in both jurisdictions, responsible for the manufacture, processing, or distribution of the selected products with the traceability requirements set out in Article 18 of Regulation 178/2002.

¹ Agreement between the Food Safety Authority of Ireland and the Food Standards Agency in relation to food incidents

²[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](#)

2.2.3 The secondary objective was to ascertain whether, in the event of an incident, information available at food business operator level would allow competent authorities to trace the food concerned for the purpose of recall.

2.3 Background

2.3.1 Article 18 of Regulation (EC) No. 178/2002 states that:

- 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
- Food and feed business operators shall have in place systems and procedures to identify the other businesses to which their products have been supplied
- Operators shall have in place systems and procedures which allow for this information to be made available to the competent authority on demand

2.3.2 Regulation (EC) No. 178/2002 introduces the traceability requirement with the objective to ensure food safety and to assist in enabling unsafe food/feed to be removed from the market. Traceability is meant to ensure that targeted and accurate withdrawals or recalls can be undertaken, appropriate information can be given to consumers and food business operators, risk assessment can be performed by control authorities and unnecessary wider disruption of trade can be avoided.

2.3.3 The traceability requirement relies on the ‘one step back - one step forward’ approach which implies for food business operators that:

- They shall have in place a system enabling them to identify the immediate supplier(s) and immediate customer(s) of their products
- A link “supplier-product” shall be established (which products supplied from which suppliers)
- A link “customer-product” shall be established (which products supplied to which customers)

Note: - food business operators do not have to identify the immediate customers when they are final consumers.

2.3.4 In December 2004 the European Community issued guidance³ on the implementation of Articles 11, 12, 16, 17, **18**, 19 and 20 of Regulation (EC) No. 178/2002. The guidance aims to assist all players in the food chain to better understand and to apply correctly and in a uniform way the Regulation.

2.3.5 The guidance makes the following points about traceability:

- Food scares (BSE and Belgium dioxin crisis) have demonstrated that the identification of the origin of feed and food is of prime importance for the protection of consumers. In particular, traceability helps facilitate the withdrawal of food and enables consumers to be provided with targeted and accurate information concerning implicated products

³ [Guidance on the implementation of Articles 11, 12, 16, 17, 18, 19 and 20 of Regulation \(EC\) No. 178/2002](#)

- Traceability does not itself make feed/food safe. It is a risk management tool to be used in order to assist in containing a feed/food safety problem.
- Traceability has different objectives such as food safety, fair trading between operators and reliability of the information provided to consumers. The Regulation introduces the traceability requirement with in particular the objective to ensure feed/food safety and to assist in enabling unsafe feed/food to be removed from the market.
- Traceability is meant to ensure that targeted and accurate withdrawals or recalls can be undertaken, appropriate information can be given to consumers and food business operators, risk assessment can be performed by control authorities and unnecessary wider disruption of trade can be avoided.

2.3.6 The guidance also discusses the part that can be played by including internal traceability in FBO systems.

- It is in the logic of Article 18 that a certain level of internal traceability would be put in place by food business operators. Article 18 has to be read in conjunction with Recital 28 which refers to a “**comprehensive** system of traceability **within** food and feed businesses so that **targeted** and **accurate** withdrawals can be undertaken..., thereby avoiding the potential **for unnecessary disruption in the event of food safety problems**”.
- An internal traceability system will benefit the operator by contributing to more targeted and accurate withdrawals. Food business operators would save costs in terms of time of a withdrawal and in avoiding unnecessary wider disruption.
- Without prejudice to more detailed rules, the Regulation does not compel operators to establish a link (so called internal traceability) between incoming and outgoing products. Nor is there any requirement for records to be kept identifying how batches are split and combined within a business to create particular products or new batches.
- In summary, food business operators should be encouraged to develop systems of internal traceability designed in relation to the nature of their activities (food processing, storage, distribution etc). The decision on the level of detail of the internal traceability should be left upon the business operator, commensurate with the nature and size of the food business.

2.4 Enforcement of Food Legislation in the Republic of Ireland

2.4.1 The principal function of the FSAI is to take all reasonable steps to ensure that food produced, distributed, or marketed in the State meets the highest standards of food safety and hygiene reasonably available. The FSAI aims to ensure that food complies with legal requirements, or where appropriate with recognised codes of good practice.

2.4.2 The FSAI enforces food legislation through a service contract mechanism in conjunction with various official agencies – Health Service Executive (HSE), Department of Agriculture, Fisheries and Food (DAFF), Sea-Fisheries Protection Authority and City and County Councils.

2.4.3 To support food business operators and official agencies the FSAI has produced a Guidance Note on recall and traceability requirements. This guidance can be downloaded from <http://www.fsai.ie/WorkArea/DownloadAsset.aspx?id=9678>.

2.5 Enforcement of Food Legislation in Northern Ireland

2.5.1 The FSA is a non-ministerial Government department and is an enforcement authority in its own right. It is also responsible for enforcement support, advice and audit of enforcement activity with respect to local authority food safety and standards controls.

2.5.2 In Northern Ireland the enforcement of food law relating to food safety, hygiene, composition, labelling was primarily (but not solely) the responsibility of local authorities and was principally delivered through their Environmental Health Services.

2.5.3 Local authorities were responsible for imported food official controls and enforcement, specifically in relation to public health aspects, fish and fishery products, and products of non-animal origin.

2.5.4 DARD was responsible for imported food official controls and enforcement specifically in relation to animal health aspects and products of animal origin (POAO).

2.5.5 DARD, on behalf of FSA, carried out official controls and enforcement in fresh meat establishments, milk production holdings and liquid milk establishments, egg production units and packing stations, and primary production hygiene controls.

2.5.6 DARD was responsible for the enforcement of feed law in Northern Ireland.

2.5.7 The FSA also issued guidance notes on Articles 14, 16, 18 and 19 of the General Food Law Regulation (EC) No. 178/2002. The guidance notes have been developed, covering food safety, traceability and the need to notify, withdraw and/or recall products not conforming with the food safety requirements applying under the Regulation (EC) No. 178/2002. This guidance can be downloaded from <http://www.food.gov.uk/foodindustry/guidancenotes/foodguid/generalfoodlaw>

2.6 Selection of Products for Traceability Audit

2.6.1 The audit process commenced with the identification, from the catering sector in the Republic of Ireland of a composite ready to eat product containing products of animal origin which were produced in Northern Ireland. For the purpose of this report this product, which was a Ham and Cheese Ciabatta, is referred to as Product A.

2.6.2 This was followed by the identification in Northern Ireland of a composite ready to eat product containing products of animal origin which was on retail sale and had been produced in the Republic of Ireland. For the purpose of this report this product, a Roast Beef Dinner, is referred to as Product B.

2.6.3 Traceability and labelling information on these products was used as the starting point to develop audit trails back to distributors, manufacturers, or processors.

These audit trails did not extend beyond food business operations located outside Northern Ireland and the Republic of Ireland.

2.7 Risk Assessment Procedures in the Republic of Ireland

2.7.1 Article 3 of Regulation (EC) No. 882/2004⁴ 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 FBOs, the reliability of own checks and any additional information on non compliance.

2.7.2 Documented procedures, used by all official agencies enforcing food law in the Republic of Ireland, require that a risk assessment is carried out on all food business operations under their responsibility. FSAI audit teams verified, as part of this audit, that all food businesses visited had been subjected to a risk assessment process and that official controls were carried out on a frequency appropriate to that risk assessment. During these official control activities, checks were carried out to determine compliance with traceability legislation.

2.8 Risk Assessment Procedures in Northern Ireland

2.8.1 In line with the general obligations set out at Article 3 of Regulation (EC) No. 882/2004, interventions should be carried out at all stages of production, processing, and distribution to establish whether the requirements of relevant food law are being met. Interventions are defined as activities that are designed to monitor, support and increase food law compliance within a food establishment. They include, but are not restricted to, “official controls”.

2.8.2 Interventions are key to improving compliance with food law by food business operators. The range of possible interventions allows authorised officers to use their professional judgement to apply a proportionate level of regulatory and enforcement activities to each food business. Interventions should be applied in a risk-based manner such that more intensive regulation is directed at those food businesses that present the greatest risk to public health.

2.8.3 Annexe 5 of the Food law Code of Practice (Northern Ireland) 2008 (FLCoP) states ‘Each district council should document, maintain, and implement a food hygiene intervention programme that includes all the establishments for which the district council has food hygiene law enforcement responsibility’.

2.8.4 District councils base their food hygiene intervention programmes on the food hygiene intervention ratings that have been determined in accordance with Annexe 5 of the FLCoP.

⁴ [Regulation \(EC\) No. 882/2004 - on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules](#)

3.0 AUDIT FINDINGS - Product A (Ham and Cheese Ciabatta)

3.1 Retail / Point of Sale

- 3.1.1 An audit team of authorised officers from the FSAI visited a catering food business located in Co. Dublin. This food business operation sourced its products from a catering supply company located in the jurisdiction of Castlereagh Borough Council (BC) in NI. During this visit labelling and traceability information on a Ham and Cheese Ciabatta were recorded by the audit team. This information was then forwarded to the FSA in NI to commence the traceability investigation.
- 3.1.2 The food business operation in Co. Dublin was registered under the requirements of Regulation (EC) No. 852/2004 with the HSE and was supervised by the Environmental Health Service. Two environmental health officers responsible for official controls in the food business operation, as required under Regulation (EC) No. 882/2004, accompanied the audit team.
- 3.1.3 The FSAI audit team were able to establish from the documentation, records and other information examined that the traceability requirements of Regulation (EC) No. 178/2002 were being complied with in that the supplier of the Ciabatta and the customer for which it was intended could be identified.

3.2 Ham and Cheese Ciabatta Supplier

- 3.2.1 The Ham & Cheese Ciabatta was produced by a catering supply company located in Castlereagh BC's area. Two auditors from the FSA in NI carried out a focussed traceability audit at Castlereagh BC.
- 3.2.2 The audit specifically examined the Council's file records for the catering supply company. The file examination included a review of the records of recent official control interventions, the establishment's intervention rating under the FLCoP, and documentation relating to traceability.
- 3.2.3 The auditors, in conjunction with an authorised officer from Castlereagh BC, visited the catering supply company as part of the audit. The FBO of the catering supply company was able to demonstrate compliance with Article 18 of Regulation (EC) No. 178/2002.

3.3 Ciabatta Bread

- 3.3.1 Information collected by the FSA in NI during their visit to the Ham and Cheese Ciabatta supplier as detailed in 3.2 above indicated that the bread component of the product was supplied by an FBO in Dublin. An FSAI audit team visited the company in question to progress the traceability audit. During this visit the audit team discovered that the Dublin address only processed orders and the subsequent invoices. All distribution of product was subcontracted to a Coldstore supervised by Department of Agriculture, Fisheries and Food (DAFF).
- 3.3.2 An FSAI audit team visited the Coldstore, located in Co. Monaghan, contracted to distribute the Ciabatta bread. The food business operation was approved under the requirements of Regulation (EC) No. 853/2004. Using information supplied by FSA in NI, as detailed in 3.2; an FSAI audit team conducted a traceability audit in the food business operation. Records relating to this product were reviewed by the audit

team and found to be satisfactory overall. The audit team were advised however that it would not be possible to trace a specific delivery. Therefore in the case of a recall of this product the company would recall multiple deliveries of this product.

- 3.3.3 The specific audit was successful in that the information in relation to the product was traceable forwards to customers and store location (for product still on site) and also backwards to the supplier. However, it was not possible to reconcile the quantities for each delivery or batch, as information in relation to which delivery (or batch code) of the product being picked for customers, was not recorded.
- 3.3.4 The audit team verified the delivery of the product to the Northern Ireland customer, and the information provided by the Castlereagh BC matched with the information reviewed on the day of the audit.

3.4 Ham

- 3.4.1 Information collected by the FSA in NI during their visit to the Ham and Cheese Ciabatta supplier, as detailed in 3.2 above, indicated that the ham component of the product was supplied by a meat processor located in Newry & Mourne District Council's area. An FSA in NI audit team conducted a traceability audit at Newry and Mourne DC.
- 3.4.2 The audit specifically examined the Council's file records for the meat processor. The file examination included a review of the records of recent official control interventions, the establishment's intervention rating under the FLCoP, and documentation relating to traceability.
- 3.4.3 The auditors, in conjunction with authorised officers from Newry and Mourne DC, visited the meat processor as part of the audit. The meat processor was able to demonstrate compliance with Article 18 of Regulation (EC) No. 178/2002.
- 3.4.4 The meat processor had an internal traceability system which allowed the auditors to specifically trace the batch of pork shank used to produce the ham used in the Ham and Cheese Ciabatta.

3.5 Cheese

- 3.5.1 Information collected by the FSA in NI during their visit to the Ham and Cheese Ciabatta supplier, as detailed in 3.2 above, indicated the cheese component of the product was supplied by a food distribution company located in Coleraine Borough Council's area. An FSA in NI audit team conducted a traceability audit at Coleraine BC.
- 3.5.2 The audit specifically examined the Council's file records for the distributor. The file examination included a review of the records of recent official control interventions, the establishment's intervention rating under the FLCoP, and documentation relating to traceability.
- 3.5.3 The auditors, in conjunction with an authorised officer from Coleraine BC, visited the distribution company as part of the audit. The food distribution company was able to demonstrate compliance with Article 18 of Regulation (EC) No. 178/2002.
- 3.5.4 The cheese was supplied to the distribution company from a cheese processor located in England. The cheese processor was located outside of Northern Ireland

and the Republic of Ireland therefore, in accordance with point 2.6.3, the trace stopped at this point.

3.6 **Pork Shank**

3.6.1 Information collected by FSA in NI indicated that pork shank used in the manufacture of the Ham and Cheese Ciabatta was sourced from a slaughter house and attached cutting plant in the Republic of Ireland. This food business operation was supervised by DAFF and was an approved establishment under the requirements of Regulation (EC) No. 853/2004.

3.6.2 Using information supplied by FSA in NI, as detailed in 3.4, an FSAI audit team conducted a traceability audit in the food business operation identified. Documentation, records, and other information supplied by the food business operator to the audit team verified that the pork shanks in question had been supplied to the meat processor in Northern Ireland. Production traceability and batch records also established the date of slaughter of the animals from which the pork shanks were sourced.

3.7 **Cure**

3.7.1 The company which processed the pork shank as described in paragraph 3.4 above sourced the cure used in the process from a producer which was supervised by the Environmental Health Service of the HSE in the Republic of Ireland.

3.7.2 The cure producer was registered with the HSE as required by Regulation (EC) No. 852/2004 and the FSAI audit team confirmed that official controls were carried out in the food business operation in accordance with the requirements of Regulation (EC) No. 882/2004.

3.7.3 The audit team verified that the food business operation which produced the cure had incorporated traceability and recall procedures into their food safety management system. Using the information provided by the FSA in NI and the company's computerised system, records and procedures the audit team verified the traceability of the batch of cure which was an ingredient in the Northern Ireland product.

3.8 **Salt**

3.8.1 Information collected by the FSA in NI during their visit to the meat processor located in Newry and Mourne DC's area, as detailed in 3.4 above, indicated the salt component used in the curing of the pork shank was supplied by a chemical distributor located in Belfast City Council's area. An FSA in NI audit team conducted a traceability audit at Belfast CC.

3.8.2 The audit specifically examined the Council's file records for the chemical distributor. The file examination included a review of the records of recent official control interventions, the establishment's intervention rating under the FLCoP, and documentation relating to traceability. The chemical distribution company was included in Belfast CC's Alternative Enforcement Strategy due to the low score the establishment received under the food establishment intervention rating schemes.

- 3.8.3 The auditors, in conjunction with an authorised officer from Belfast CC, visited the chemical distribution company as part of the audit. The chemical distribution company was able to demonstrate compliance with Article 18 of Regulation (EC) No. 178/2002.
- 3.8.4 The salt was supplied to the distribution company from a salt importer also located in Belfast CC's area. The auditors examined the Council's file records for the salt importer. The file examination included a review of the records of recent official control interventions, the establishment's intervention rating under the FLCoP, and documentation relating to traceability. The salt importer was included in Belfast CC's Alternative Enforcement Strategy due to the low score the establishment received under the food establishment intervention rating schemes.
- 3.8.5 The auditors, in conjunction with an authorised officer from Belfast CC, visited the salt importer. The importer was able to demonstrate compliance with Article 18 of Regulation (EC) No. 178/2002.
- 3.8.6 The salt was supplied to the salt importer from a salt manufacturer located in England. The salt manufacturer was located outside of Northern Ireland and the Republic of Ireland therefore, in accordance with point 2.6.3, the trace stopped at this point.

4.0 AUDIT FINDINGS - Product B (Roast Beef Diner)

4.1 Retail / Point of Sale

4.1.1 An auditor from FSA in NI visited a food retail business in Co Fermanagh. The auditor was accompanied by an authorised officer from Fermanagh District Council. During the visit the auditor collected labelling and traceability information for a roast beef diner which was produced in the Republic of Ireland. This information was then forwarded to the FSAI to commence the traceability investigation.

4.2 Roast Beef Dinner Manufacturer

4.2.1 The company which produced the roast beef dinner as described in 4.1 was visited by an FSAI audit team. The food business operation was supervised by DAFF and was approved under the requirements of Regulation (EC) No. 854/2004.

4.2.2 The food business operation manufactured a range of processed foods for supply into the catering and retail sectors. The FBO had documented product identification and traceability procedures within their food safety management system. These had been sub-divided into:

- Traceability and
- Product recall

4.2.3 The purpose of the traceability procedure was to ensure that a system was in place which had the ability to trace and follow all raw materials from source through all stages of processing and distribution of finished product. The purpose of the recall procedure was to have a system in place to assist with the effective management of a product recall or withdrawal.

4.2.4 Using the procedures described in 4.2.2 above and the information supplied by FSA in NI, the FSAI audit team verified the traceability of the Northern Ireland product and also confirmed that it complied with the requirements of Article 18.3 of Regulation (EC) No. 178/2002.

4.3 Roast Beef Supplier

4.3.1 During the audit in the food business operation, described in 4.2 above, the supplier of cooked meats was identified. This plant was supervised by DAFF under the requirements of Regulation (EC) No. 854/2004.

4.3.2 The company had documented product identification and traceability procedures within their food safety management system. These were sub-divided into:

- Traceability and
- Management of incidents – including product withdrawal and product recall, as well as contingency planning

4.3.3 The aim of the FBO traceability procedure was to identify and trace all batches of raw materials, products and packaging from intake back to supplier, through to dispatch to customer.

4.3.4 Using the records and procedures described in 4.3.3 it was possible to trace the product back one step to the supplier.

- 4.3.5 Using the records and procedures described in 4.3.3, the audit team were not in a position to verify completely the traceability of the roast beef one step forward to the food business operator described in 4.2. There was no record of the product being supplied to the customer on the FBO's traceability records. However traceability to the customer was established through an entry on the "dispatch sheet". The traceability procedure does not reference the "dispatch sheet" as a traceability record.
- 4.3.6 The audit team noted that there was room for improvement in relation to adhering to traceability procedures and records. This related mainly to clerical errors in paperwork, and could be improved by closer attention to detail and the completion of records in a contemporaneous manner.
- 4.3.7 Follow up on improved compliance with traceability requirements is being incorporated into official controls carried out by DAFF in this food business operation.

4.4 **Beef Supplier**

- 4.4.1 The FSAI team, during the audit of the food business operation described in 4.3 above, identified the supplier of beef which had been incorporated into the Northern Ireland product. The beef supplier was approved by the DAFF under the requirements of Regulation (EC) No. 854/2004.
- 4.4.2 The food business operation in question had documented product identification and traceability procedures within their food safety management system. These were sub-divided into:
- Traceability and
 - Management of incidents, product withdrawal and product recall
- 4.4.3 The aim of the traceability procedure was to explain and verify the traceability system in operation in the company. The audit team noted that the traceability procedure detailed the makeup of the barcode.
- 4.4.4 Using the information available to the FSAI team from previous audits and the company's computerised system, records and procedures; the audit team were able to verify the traceability of the beef incorporated into the Northern Ireland product.

4.5 **Vegetable Supplier**

- 4.5.1 Using information collected during the audit of the food business operation described in 4.2 the supplier of vegetables was identified and the batch of product used in the production was identified.
- 4.5.2 The FSAI does not have responsibility for primary production.

5.0 CONCLUSIONS

- 5.1.1 The ARD committee of the Northern Ireland Assembly carried out an inquiry into the dioxin incident in December 2008. As part of that inquiry the ARD committee took evidence from the FSA in NI in September 2009 and FSAI in October 2009. One of the recommendations made by the ARD committee was that the Agreement⁵ between FSAI and FSA in NI be tested to '*ensure that there was a consistent and joined up approach to cross border alerts*'.
- 5.1.2 A joint exercise between FSAI and FSA in NI to verify compliance by FBOs, in the jurisdictions of Northern Ireland and the Republic of Ireland, responsible for the manufacture, processing, or distribution of the selected products with the traceability requirements set out in Article 18 of Regulation 178/2002 was conducted. The exercise was designed to verify the traceability of two composite products containing food of animal origin and their ingredients which were sourced in one jurisdiction but produced or manufactured in the other.
- 5.1.3 Detailed information was exchanged between the two competent authorities who proved successful in achieving the objectives of the exercise and demonstrated that the FSAI and the FSA in NI have a consistent and co-operative approach when dealing with issues of mutual interest in either or both jurisdictions.
- 5.1.4 A total of 14 FBOs were visited, in Northern Ireland and the Republic of Ireland, during the joint traceability exercise to determine compliance with traceability requirements.
- 5.1.5 All 14 FBO's audited were in a position to provide information to the FSAI or FSA audit teams regarding:
- The food businesses to which they provided products or ingredients
 - The food businesses from which they were supplied with a product or ingredients
- 5.1.6 FBOs that had incorporated traceability procedures into their food safety management systems were in a better position to respond quickly and more accurately to requests for specific traceability information.

⁵ Agreement between the Food Safety Authority of Ireland and the Food Standards Agency in relation to food incidents

6.0 RECOMMENDATIONS

- 6.1 An assessment of the compliance with the requirements of Art 18 of EC Regulation 178/2002 by competent authorities should form part of official controls activities.
- 6.2 FBOs should be encouraged by competent authorities to incorporate into their food safety management systems European Community guidance on the implementation of Articles 11, 12, 16, 17, **18**, 19 and 20 of Regulation (EC) No. 178/2002.
- 6.3 The agreement between FSAI and FSA should be kept under continuous review in relation to food incidents.
- 6.4 Should FSAI assume responsibility for feed a similar joint exercise be carried out to determine compliance with traceability requirements by Feed Business Operators.

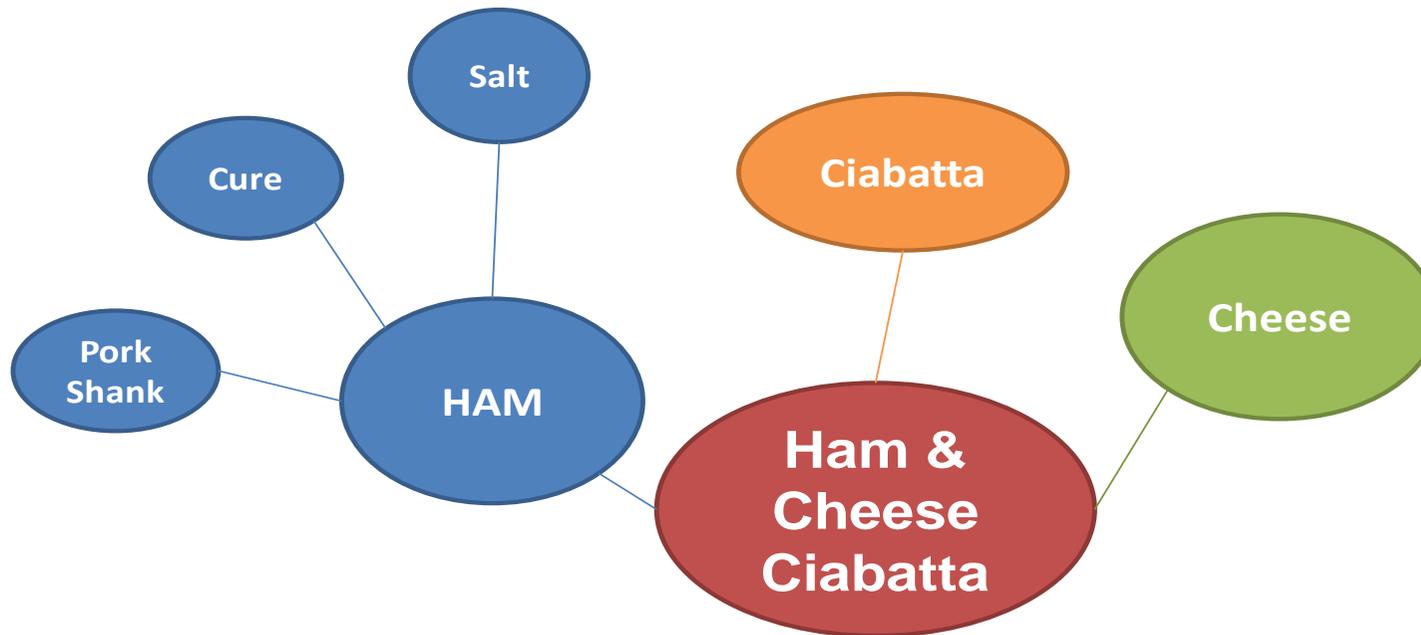
Annexe A - Product A - Ham and Cheese Ciabatta

Food Business Reference	Food Business	Component	Audit of Food Business Carried Out By	Was Traceability Established One Step Back	Was Traceability Established One Step Forward	Did Food Business Audited Comply with Article 18 of Regulation 178/2002	Food Business Reference of Supplier(s)
1	Catering Food Business in Republic of Ireland	Ham and Cheese Ciabatta	FSAI	Yes	N/A as consumer was the final customer	Yes	2
2	Catering Supply Food Business in NI	Ham and Cheese Ciabatta	FSA in NI	Yes	Yes	Yes	3,4,5
3	Meat Processor	Cured Ham	FSA in NI	Yes	Yes	Yes	7, 8,9
4	Distributor in Northern Ireland	Cheese	FSA in NI	Yes	Yes	Yes	N/A - Component was Imported
5	Distributor in Republic of Ireland	Ciabatta	FSAI	Yes	Yes	Yes	6
6	Coldstore in Republic of Ireland	Ciabatta	FSAI	Yes	Yes.	Yes	N/A - Component was Imported
7	Meat Processor	Pork Shank	FSAI	Yes	Yes	Yes	N/A - See Note 1
8	Importer	Salt	FSA in NI	Yes	Yes	Yes	N/A - Component was Imported
9	Ingredient Supplier	Cure	FSAI	Yes	Yes	Yes	N/A - See Note 2
10	Chemical Distributor	Salt	FSA in NI	Yes	Yes	Yes	8

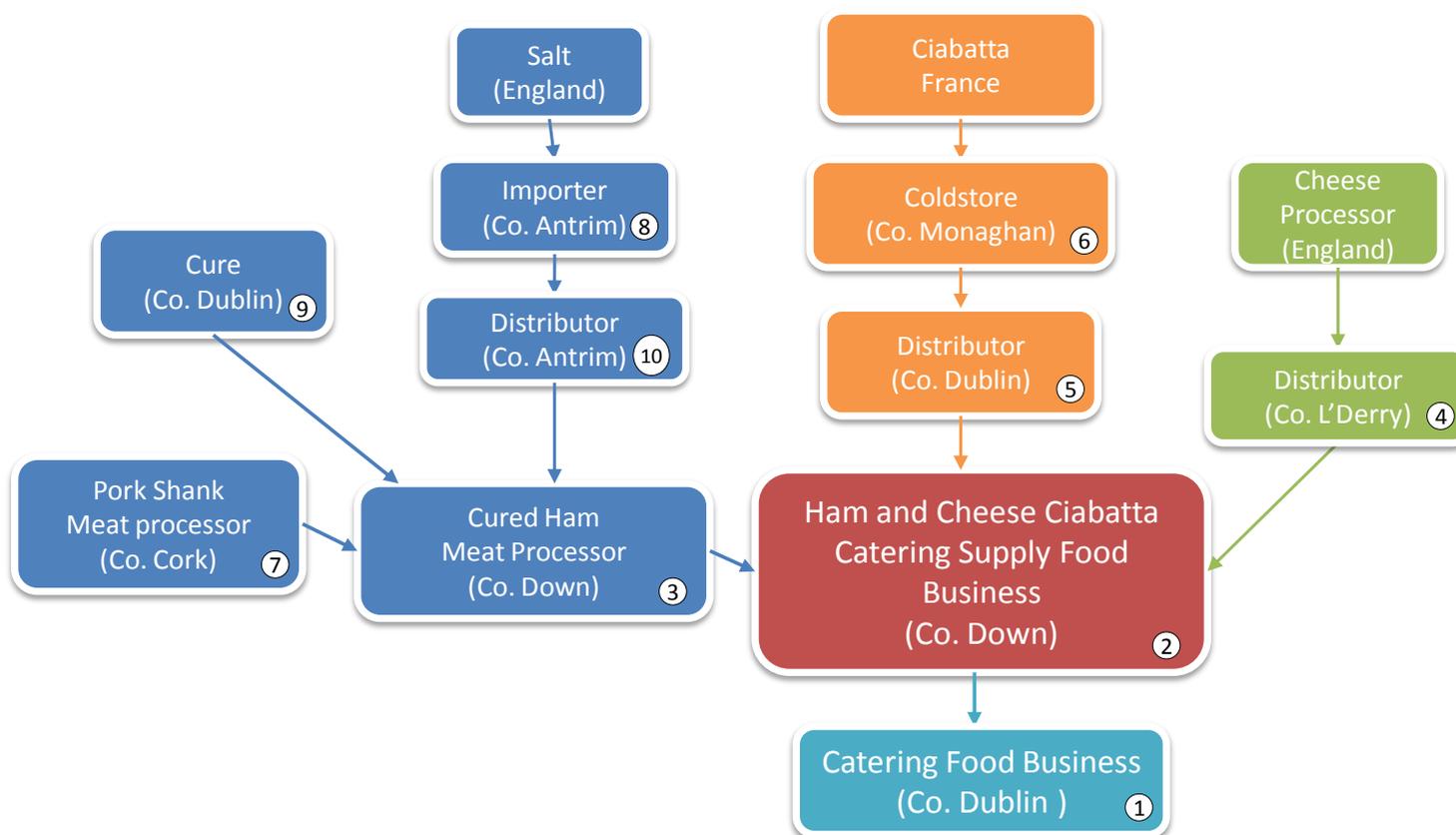
Note 1: The meat processor is attached to its own slaughterhouse. The Audit Team established date of slaughter and through food chain information the group of suppliers whose animals were slaughtered on that day.

Note 2: FSAI completed its traceability audit at this point and did not develop audit trails for the cure components.

Ingredients – Product **A**



Product A



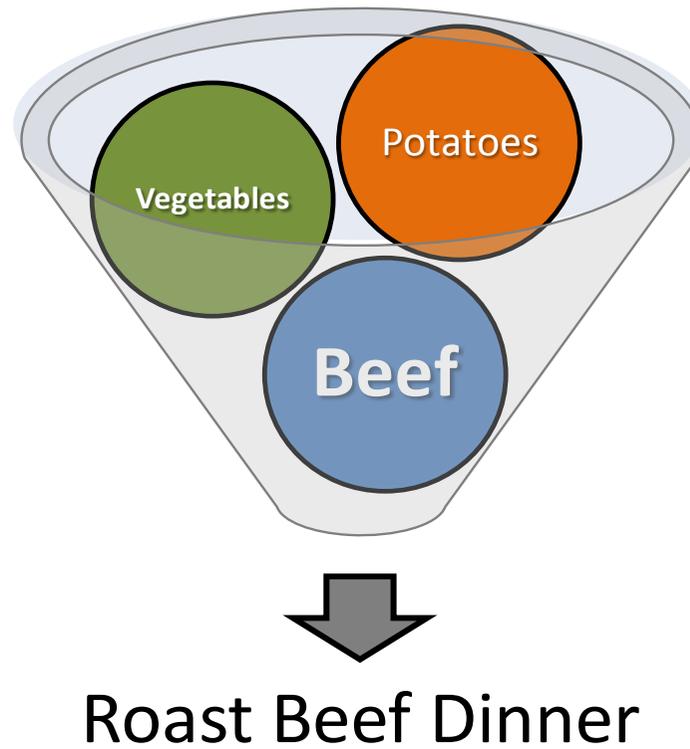
Annexe B - Product B - Roast Beef Dinner

Food Business Reference	Food Business	Component	Audit of Food Business Carried Out By	Was Traceability Established One Step Back	Food Business Reference of Supplier(s)	Was Traceability Established One Step Forward	Did Food Business Audited Comply with Article 18 of Regulation 178/2002
1	Retail Store In Northern Ireland	Roast Beef Dinner	FSA-NI	Yes	2	Yes	Yes
2	Food Processor	Roast Beef Dinner	FSAI	Yes	3	Yes	Yes
3	Food Processor	Roast Beef	FSAI	Yes	4	NO See Note 1	Yes
4	Meat Processor	Beef (Raw)	FSAI	Yes	Not Applicable See Note 2	Yes	Yes

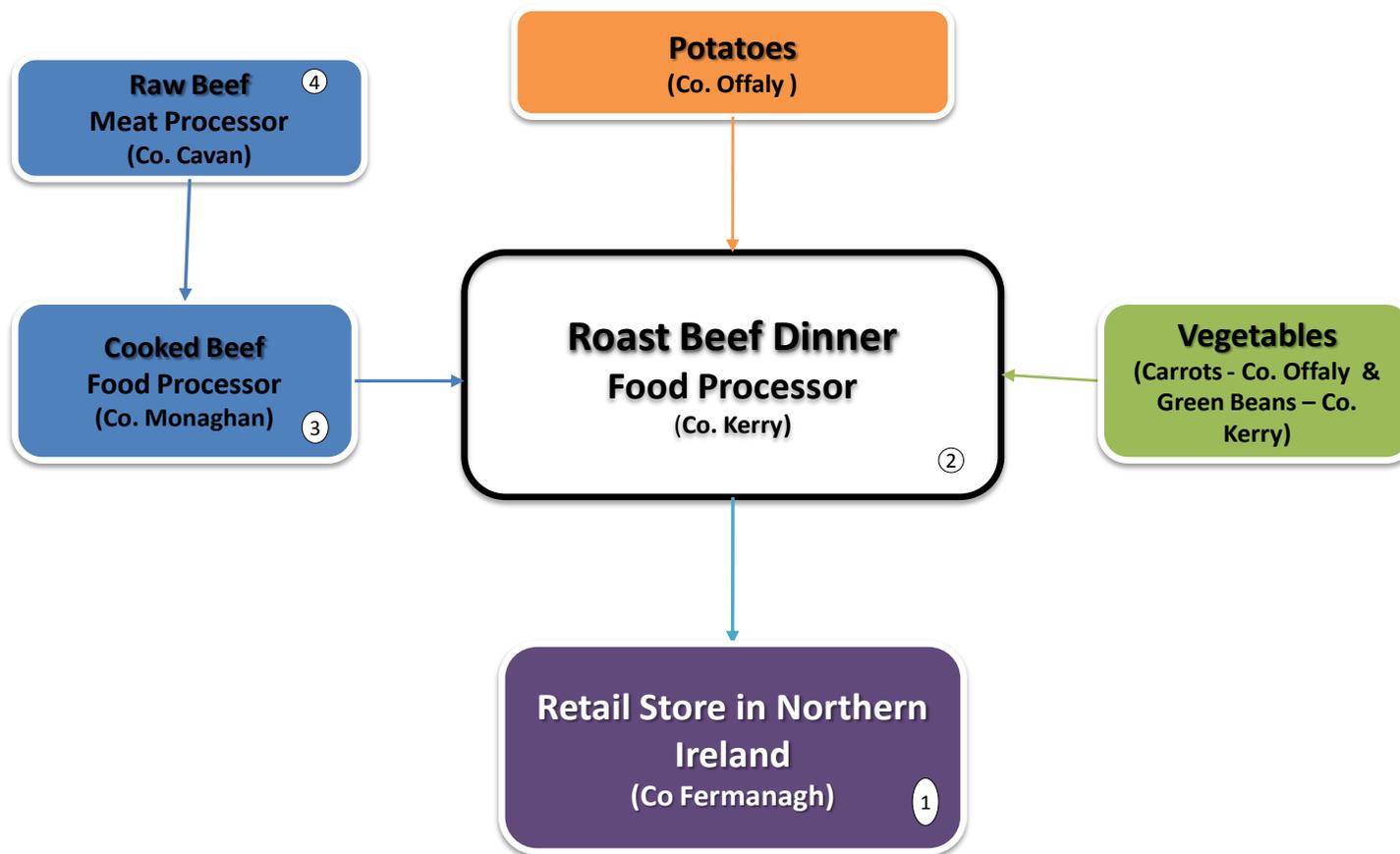
Note 1: The exercise was not successful in that there was no information recorded on the traceability records sheet in relation to the delivery of the product to the customer concerned. However, there was a note of the customer being supplied with the product on the order and dispatch sheet, of the batch concerned.

Note 2: The meat processor is attached to its own slaughterhouse. Using a batch code the Audit Team established the date of slaughter of the animal from which the portion of beef came.

Ingredients – Product **B**



Product B



Annexe C - Glossary

<p>Agriculture and Rural Development (ARD) Committee</p>	<p>The ARD Committee undertakes a scrutiny, policy development and consultation role with respect to the Department of Agriculture and Rural Development and plays a key role in the consideration and development of legislation.</p>
<p>Audit</p>	<p>Audit means a systematic and independent examination to determine whether activities and related results comply with planned arrangements and whether these arrangements are implemented effectively and are suitable to achieve objectives.</p>
<p>Alternative Enforcement Strategy (AES)</p>	<p>Strategy is used in “Low-risk” establishments. The establishment can be subject to an alternative enforcement or intervention at least once during any three year period.</p>
<p>Authorised Officer</p>	<p>A suitably qualified Officer who is authorised by the Local Authority to act on its behalf in, for example, the enforcement of legislation.</p>
<p>Composite Product</p>	<p>A composite product is defined in European Union (EU) legislation as a foodstuff intended for human consumption that contains both processed products of animal origin and products of plant origin.</p>
<p>Department of Agriculture, Fisheries and Food (DAFF)</p>	<p>DAFF is a Department of the Government of Ireland and is one of the competent authorities responsible for the enforcement of food law in the Republic of Ireland.</p>
<p>Food Business Operator (FBO)</p>	<p>This refers to the natural or legal persons responsible for ensuring that the requirements of food law are met within the food business under their control.</p>
<p>Food Law Code of Practice (Northern Ireland) August 2008 (FLCoP)</p>	<p>Article 39 of the Food Safety (NI) Order 1991 (the Order), Regulation 22 of the Food Hygiene Regulations (NI) 2006 and Regulation 6 of the Official Feed and Food Controls Regulations (NI) 2007, which empower the Department of Health Social Services and Public Safety to issue codes of practice concerning the execution and enforcement of that legislation by district councils. This code is issued as guidance to Local Authorities on the enforcement of food legislation. It relates to Northern Ireland only.</p>
<p>Food Safety Authority of</p>	<p>The Food Safety Authority of Ireland was established under the Food Safety Authority of Ireland Act, 1998. The</p>

Ireland (FSAI)	Authority is a statutory, independent and science-based body, dedicated to protecting public health and consumer interests in the area of food safety and hygiene. It comes under the aegis of the Minister for Health and Children.
Food Standards Agency (FSA)	The Food Standards Agency is a non-ministerial Government department set up by an Act of Parliament in 2000 to protect the public's health and consumer interests in relation to food.
Framework Agreement	<p>The Framework Agreement consists of:</p> <ul style="list-style-type: none"> Chapter One Service Planning Guidance Chapter Two The Standard Chapter Three Monitoring of Local Authorities Chapter Four Audit Scheme for Local Authorities <p>The Standard sets out the Agency's expectations on the planning and delivery of food law enforcement.</p> <p>The Monitoring Scheme requires Local Authorities to submit an annual return to the Agency on their food enforcement activities i.e. numbers of inspections, samples, and prosecutions. Under the Audit Scheme the Food Standards Agency will be conducting audits of the food law enforcement services of Local Authorities against the criteria set out in The Standard.</p>
Health Safety Executive (HSE)	The HSE is one of the competent authorities for the enforcement of food law in the Republic of Ireland.
Interventions	Interventions are defined as activities that are designed to monitor, support and increase food law compliance within a food establishment. They include, but are not restricted to, "official controls".
Local Authority (LA)	An organization that is officially responsible for all the public services and facilities in a particular area
Memorandum of Understanding (MOU)	The MOU formalises arrangements for co-operation between the FSAI and the FSA in NI, in relation to food incidents including hazards and alerts.
Practice Guidance	Guidance issued by the Food Standards Agency to assist district councils with the discharge of their statutory duty to enforce the Food Safety (NI) Order 1991, Regulations made under it, and food law made under the European

	Communities Act 1972.
Risk rating	A system that rates food establishments according to risk and determines how frequently those premises should be inspected.