

AUDIT REPORT

Audit of the Official Controls Undertaken by the Sea Fisheries Protection Authority (SFPA) Regarding the Microbiological Classification of Shellfish Waters

Sea Fisheries Protection Authority

NOVEMBER 2018 – APRIL 2019



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1. Glossary

FSAI	Food Safety Authority of Ireland
HACCP	hazard analysis and critical control point
COP	Code of Practice
FSAI	Food Safety Authority of Ireland
MI	Marine Institute
NRL	National Reference Laboratory
SFPA	Sea Fisheries Protection Authority
SFPO	Sea Fisheries Protection Officer
SOP	Standard Operating Procedure
EC	European commission
MSSC	Molluscan Shellfish Safety Committee

2. Executive Summary

As part of its legal mandate the Food Safety Authority of Ireland (FSAI) is required to verify through its audit programmes that the system of official controls is working effectively. The primary objective of this audit was to verify compliance by the Sea Fisheries Protection Authority (SFPA) with relevant legislative requirements and the SFPA's Code of Practice for the Microbiological Monitoring of Bivalve Mollusc Production Areas on Classification. This audit was undertaken using documented procedures which are included in the FSAI Business Management System.

SFPA has responsibility for the implementation and enforcement of national and EU legislation, which deals with health conditions for the production and placing on the market of fish, shellfish and fisheries products. The SFPA has a service contract with the FSAI which outlines the agreed level and standard of seafood safety activity it performs as a competent authority to meet the requirements of the service contract. Sea Fishery Protection Officers (SFPO's) dedicate their time between official controls related to food law and their responsibilities for the enforcement of conservation legislation. At the time of this audit the team met several newly recruited SFPO's who were coming to the end of their induction training. However, the resource demands associated with the supervision of seasonal of pelagic landings, can deprioritise the delivery of official controls specific to food law.

There is a structured approach to the organisation of staff and the performance of official controls. This was evident in headquarters (Clonakilty) and each of the 3 port offices audited. The SFPA documents on an annual basis a food safety control plan which provides a baseline framework for the official controls carried out by the SFPA's staff. Section 2.4 of the plan details how official controls are conducted in order to protect human health, that shellfish production areas are monitored, and they are classified in accordance with legislative requirements. Staff performing these controls use guidance contained in documented procedures and have the legal powers to enforce the relevant legislation. The SFPA carries out internal audits to ensure official controls are in compliance with the requirements of Regulation 852/2004.

In relation to the classification of shellfish waters, the SFPA has fixed the location and boundaries of the production areas it has classified as required by Regulation 854/2004. The criteria for classification are included in Regulation (EC) 854/2004, Regulation (EC) 853/2004 and Regulation (EC) 2073/2005.

Sanitary surveys involve the identification of potential sources of faecal contamination of bivalve mollusc harvesting areas and an assessment of the likely impact of the sources on the microbiological quality of the fisheries. SFPA have committed to have sanitary surveys for shellfish harvesting areas undertaken for all newly classified shellfish production areas and to establish a programme to conduct sanitary surveys of all existing classified shellfish production areas.

The FSAI team noted the finding of the final internal audit report in December 2017 which identified that "sanitary surveys had not been carried out or that supporting evidence in relation to areas was not available and requested an update." SFPA provided the FSAI audit team with documentation seeking expressions of interest to deliver sanitary surveys for new and existing shellfish production areas with a closing date of November 2018 and in January 2019 a contract was signed with the successful tender company.

The audit team noted that the tender was for the completion of individual sanitary survey reports for ten separate molluscan harvesting areas. A nationwide approach was adopted, across all port offices, when considering harvesting areas for this initial tranche, nine of which were already classified with one being a potentially new classification. In April 2019, the official agency had completed two desktop interim reports and four more desktop studies were nearing completion. However no overall programme has been documented to schedule when all sanitary surveys will be completed. At the time of the audit no standard operating procedure (SOP) had been developed to regularise the approach to sanitary surveys and to ensure the consistency of data being recorded.

3. Introduction

The audit of official controls undertaken by the Sea Fisheries Protection Authority (SFPA) regarding the classification of shellfish waters was conducted as part of the planned programme of audits of official controls, undertaken by the Food Safety Authority of Ireland (FSAI) in 2018. The project involved audits at SFPA Headquarters (HQ) and three Port Offices.

3.1 Audit objective

The primary objective of the audit was to verify compliance by SFPA with Community Reference Laboratory's Community Guide to Good Practice, the SFPA's Code of Practice for the 'Microbiological Monitoring of Bivalve Mollusc Production Areas on Classification' and other relevant legislation.

3.2 Audit scope

The scope of the audit was to verify that official controls were carried out to ensure compliance with the specific legislation relating to the classification of shellfish waters and conformance with documentation developed to provide guidance on how to implement this legislation. It assessed the process to microbiologically classify sampling, sample transport and handling, information dissemination, decision-making and sanitary surveys.

The scope of the audit did **not** include an evaluation of the work of the Marine Institute (MI) regarding its role in the testing of samples. The MI is an Official Agency of the FSAI operating under a Service Contract and has been designated as the National Reference Laboratory (NRL) for monitoring the microbiological and virologic contamination of bivalve shellfish. The MI coordinates the activities of the national testing laboratories involved in the microbiological monitoring programme ensuring high quality standards for the relevant analysis are maintained.

Audit criteria and reference documents

- [Food Safety Authority of Ireland Act, 1998](#) (S.I. No 29 of 1998), as amended.
- [Service Contract between FSAI & SFPA](#)
- [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 and in particular **Appendix II**.
- [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 \(EC\) No 2073/2005](#) on microbiological criteria for foodstuffs, as amended

3.3 Audit methodology

This audit was undertaken using documented procedures which are included in the FSAI Business Management

System, namely the FSAI Audit Procedure and Charter. These procedures implement the FSAI audit obligations and are in accordance with the requirements of Regulation (EC) No 882/2004 (including Article 6.1 of Commission Decision 677/2006) and Section 48 (9) of the FSAI Act.

An information note was forwarded to SFPA to initiate the audit and outline its scope and objective. In addition, a pre-audit questionnaire was forwarded to the SFPA, the purpose of which was to collate and confirm information regarding official controls and documented procedures within the SFPA which relate to the microbiological classification of shellfish waters. An evaluation plan was then developed, which provided a detailed overview of the audit; including audit scope, objectives, criteria and the FSAI team. The evaluation plan also included a proposed itinerary for on-site activity.

The audit commenced with an opening meeting and audit at SFPA headquarters. This aspect of the audit included discussions regarding the organisation, planning and coordination of related official controls, enforcement actions taken, and any other aspect of the classification process coordinated through Clonakilty.

Three regional audits were conducted in the Port Offices of Dunmore East, Castletownbere and Killybegs. These regional audits allowed the audit team to verify compliance with legislation relating to the carrying out of official controls in areas under the supervision of the Senior Port Officer who manages these offices. This involved the evaluation of documentation and records relating to relevant official activities and any follow up taken following the receipt of unsatisfactory results or the implementation of a management cell decision. The audit team observed the taking of an official sample in one port office.

A closing meeting was held in each Port Office with official agency personnel to verbally outline findings relating to official controls and food law. The preliminary overall audit findings were verbally outlined during a final closing meeting conducted by way of a conference call with staff from SFPA HQ and the three port offices audited.

4. Audit Findings

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

4.1.1 Organisation and structure of official controls

Article 4 of Regulation (EC) No 882/2004 requires Member States to designate the competent authorities responsible for the purposes of the official controls set out in the Regulation. It also lays down operational criteria for the competent authorities.

The SFPA has a service contract with the FSAI which outlines the agreed level and standard of seafood safety activity it performs as a competent authority. SFPA has responsibility for the implementation and enforcement of national and EU legislation, which deals with health conditions for the production and placing on the market of fish, shellfish and fisheries products. A dedicated Unit is based in Clonakilty the primary function of which is to support and co-ordinate the food safety regulatory activities of the SFPA. Port offices are managed by senior port officers who are supported by sea-fisheries protection officers and clerical staff.

There is a structured approach to the organisation of staff and the performance of official controls. This was evident in Clonakilty and each of the port offices audited. The SFPO's dedicate their time between official controls related to food law and their responsibilities for the enforcement of conservation legislation. At the time of this audit the team met several newly recruited SFPO's who were coming to the end of their induction training. However, the resource demands associated with the supervision of seasonal pelagic landings, can deprioritise the delivery of

official controls specific to food law.

4.1.2 Coordination and Planning

Article 4(3) of Regulation (EC) No 882/2004 states when a Member State confers the competence to carry out official controls on an authority or authorities other than a central competent authority, in particular those at regional or local level, efficient and effective coordination shall be ensured between all the competent authorities involved.

The Molluscan Shellfish Safety Committee (MSSC) was created, following Ministerial direction, to provide a partnership forum for all stakeholders involved in the production, processing, development, analysis and regulation of shellfish. Section 1.4.1 of the 'Code of Practice for the Microbiological Monitoring of Bivalve Mollusc Production Areas'. FSAI, SFPA and the MI are members of the Molluscan Shellfish Safety Committee (MSSC).

The audit team reviewed the minutes of the meetings of the MSSC for 2017 and 2018. It was noted that an update on shellfish monitoring is a standing item and progress on meeting yearly sample targets is reported to the members and out-of-specification results are highlighted.

4.1.3 Legal procedures

Article 8 of Regulation (EC) No 882/2004 states that Member States shall ensure they have legal procedures in place in order to ensure that staff of the competent authorities have access to premises of and documentation kept by feed and food business operators so as to be able to accomplish their tasks properly.

The Department of Agriculture Food and Marine (DAFM) is responsible for drafting and, transposing food safety and fisheries legislation which SFPA is responsible for enforcing. The European Communities (Food and Feed Hygiene) Regulations 2009 (SI 432 Of 2009) allows for the enforcement of the relevant requirements of food law that apply to the microbiological classification of shellfish waters and the onward sale of bivalves harvested from such waters. In addition, Section 17 of the Sea-fisheries and Maritime Jurisdiction Act 2006 sets out the powers of SFPO's related to the inspection, examination and detention of seafood. The audit team verified that selected officers in HQ and the ports visited had been issued with official warrants to enforce this legislation.

4.1.4 Prioritisation of official controls and risk categorisation

Article 3 of Regulation (EC) No 882/2004 requires that official controls are carried out regularly, on a risk basis and with appropriate frequency. In doing so, account must be taken of identified risks that may influence food safety, past records of food business operator compliance, the reliability of own checks and any additional information on non-compliance. Controls shall in general, be carried out without prior warning.

The SFPA documents on an annual basis a food safety control plan which provides a baseline framework for the official controls carried out by the SFPA's staff. The control plan outlines the food safety controls to be carried out in establishments which are under the supervision of the SFPA and includes detailed descriptions of the official controls and associated tasks that are undertaken in the various establishment types.

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The audit team reviewed the food safety control plans for 2017 and 2018. Section 2.4 of the plans detail how official controls are conducted in order to protect human health, that production areas are monitored, and they are classified according to the levels of *E. coli* bacteria in shellfish. An area's classification status dictates if shellfish can be eaten raw, if they must be purified or relayed, if they must be cooked prior to consumption or whether harvesting is prohibited. Guidance for SFPO's on the implementation of the requirements of the food safety control plan is contained in a number of documented procedures and protocols.

4.1.5 Documented procedures

Article 8 of Regulation (EC) No 882/2004 requires that competent authorities carry out their official controls in accordance with documented procedures, containing information and instructions for staff performing official controls.

The SFPA has documented a suite of procedures to guide sea-fisheries protection officers during official controls. These include the food safety control plan, SOPs, codes of practice (COP)'s These documents are available to staff via the SFPA intranet. SFPA has developed a '*Code of Practice for the Microbiological Monitoring of Bivalve Mollusc Production Areas*'. The Code of Practice draws on best practice in Europe and statutory requirements and outlines procedures for:

- Producing sampling plans and conducting sanitary surveys
- Requirements for sample collection and testing
- Procedures for making classifications including data interpretation
- Communication
- Additional risk management procedures including reacting to high *E. coli* results.

The COP documents procedures to be followed for shellfish sampling, SFPO's, the laboratories undertaking microbiological analysis of shellfish and those charged with managing the information generated from the monitoring programme. The audit team found that the COP was sufficiently detailed to provide guidance for SFPA staff during the course of their work. Appendices to the COP contained specific instructions on sampling, storage and transport and the dissemination of information. The audit team were advised that an SOP is also being developed to regularise the approach to sanitary surveys and also to ensure the consistency of data being recorded. When the new SOP has been completed, training will be carried out with staff on its content.

4.1.6 Staff performing official controls

Article 6 of Regulation (EC) No. 882/2004 requires the competent authorities to ensure that staff receive appropriate training and are kept up-to-date in their competencies.

The audit team were informed that a new performance management and development system is being implemented which will help identify training requirements for staff. The Human Resources Unit are implementing a training assessment implementation process. The audit team reviewed the programme for the regional shellfish workshops. These events are designed to update staff on recent developments and serve as training events.

SFPA has recently recruited new members to the position of Sea Fisheries Protection Officers. These new SFPO's will perform duties in all areas under the remit of the Authority including the enforcement of food law. The audit team reviewed the 'Shellfish monitoring, gatherers documents, and food business operators' responsibilities' module delivered during training events to these new staff members. Part of the module focused on the classification of growing areas. The audit team were satisfied that the content of this module covered the main aspects of official control requirements set out in Annex II of Regulation (EC) 854/2004.

As part of the tender contract awarded to a contractor to carry out sanitary surveys there was a provision for the training of SFPA staff in conducting such surveys. This element of the project is expected to be rolled out in the period between May 2019 and June 2019 with 12 SFPO's being trained in how to conduct the shore line surveys.

4.1.7 Internal audit

Article 4.6 of Regulation (EC) No 882/2004 requires that competent authorities shall carry out internal audits or may have external audits carried out and shall take appropriate measures in the light of their results, to ensure that they are achieving the objectives of this Regulation. These audits shall be subject to independent scrutiny and shall be carried out in a transparent manner.

In January 2017, Deloitte were engaged by SFPA for the provision of technical internal audit services. Deloitte in November 2017 reported on a technical audit of live bivalve molluscs. The FSAI audit team reviewed the findings of Deloitte report and as part of this audit assessed progress made by SFPA in the intervening period to close out the finding regarding the absence of sanitary surveys.

More detail on this aspect of the audit is contained in Section 4.2.3 of this report.

4.2 Official controls concerning live bivalve molluscs from classified production areas

4.2.1 The location and boundaries of production areas

Annex II Chapter II B of Regulation 854/2004 requires that the competent authority must fix the location and boundaries of production and relaying areas that it classifies.

The audit team verified that the SFPA has fixed the location and boundaries of the production areas it has classified. The attached link (<https://www.sfpa.ie/What-We-Do/Molluscan-Shellfish/Classified-Areas>) provides up-to-date information on each production area, its boundaries and bed name. It also provided details on the species approved for harvesting and the current microbiological classification of the production area.

4.2.2 Classification of production areas

Annex II Chapter II of Regulation 882/2004 states that the competent authority must classify production areas from which it authorises the harvesting of live bivalve molluscs.

Table 1 sets out the criteria for the classification of bivalve mollusc harvesting areas under Regulation (EC) No 854/2004, Regulation (EC) 853/2004 and Regulation (EC) 2073/2005.

Table 1: Criteria for the Classification of Bivalve Mollusc Harvesting Areas under Regulations, (EC) No 854/2004, 853/2004, 2073/2005

Classification	Standard per 100 g of LBM flesh and intravalvular fluid	Treatment required
A	<230 <i>E. coli</i> per 100 g of flesh and intravalvular liquid. ¹	None
B	LBMs must not exceed the limits of a five-tube, three dilution. Most Probable Number (MPN) test of 4,600 <i>E. coli</i> per 100 g of flesh and intravalvular liquid. ²	Purification, relating in class A area or cooking by an approved method
C	LBMs must not exceed the limits of a five-tube, three dilution MPN test of 46,000 <i>E. coli</i> per 100 g of flesh and intravalvular liquid.	Relaying for a long period or cooking by an approved method
Prohibited	>46,000 <i>E. coli</i> per 100 g of flesh and intravalvular fluid. ³	Harvesting not permitted

4.2.3 Sanitary surveys

Sanitary surveys involve the identification of potential sources of faecal contamination of bivalve mollusc harvesting areas and an assessment of the likely impact of the sources on the microbiological quality of the fisheries. A sanitary survey is the first step in establishing a classification and a monitoring programme for a bivalve mollusc harvesting area. It provides an overview of pollution influences and thus a scientific basis for subsequent identification of representative sampling points and the establishment of a sampling plan. In addition, the main purpose of a Sanitary Survey is to determine a representative monitoring point.

Section 2.1.1 of the COP states that ‘the SFPA will organise to have sanitary surveys for shellfish harvesting areas undertaken for all newly classified shellfish production areas and to establish a programme to conduct sanitary surveys of all existing classified shellfish production areas.’

¹ By cross- reference from Regulation (EC) No 852/2004, via Regulation (EC) No 853/2004, to Regulation (EC) 2073/2005.

Samples of live bivalve molluscs from these areas must not exceed, in 80 % of samples collected during the review period, 230 *E. coli* per 100 g of flesh and intravalvular liquid. The remaining 20 % of samples must not exceed 700 *E. coli* per 100 g of flesh and intravalvular liquid, as amended by Regulation (EC) No 2285/2015.

² By way of derogation from Regulation (EC) No 854/2004, the competent authority may continue to classify as being of Class B areas for which the relevant limits of 4,600 *E. coli* per 100g are not exceeded in 90% of samples.

³ This level is by default as it is above the highest limit set in legislation.

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The FSAI team noted the finding of the final internal audit report prepared in December 2017 which identified that sanitary surveys had not been carried out or that supporting evidence in relation to the areas was not available and requested an update.

SFPA provided the FSAI audit team with documentation seeking expressions of interest to deliver sanitary surveys for new and existing shellfish production areas with a closing date of November 2018. This process was managed by a dedicated SFPO appointed to the role of sanitary survey coordinator. In January 2019 a contract was signed with the successful tender company. The audit team noted that the tender was for the completion of individual sanitary survey reports for ten separate molluscan harvesting areas. A nationwide approach was adopted, across all port offices, when considering harvesting areas for this initial tranche, nine of which were already classified with one being a potentially new classification.

The audit team verified that there is a dual approach between the contracting agency and the SFPA. The initial desktop element of each sanitary survey will be carried out by the agency including characterisation of the fishery and the identification of all known potential faecal contaminants with quantities and seasonality of inputs. An interim report is then produced by the successful tenderer which includes all maps relating to the harvesting area. This report is then used by SFPA staff in the port offices and by the national co-ordinator to conduct and guide the shoreline survey for each harvesting area.

As of April 2019, the agency has completed two desktop interim reports one for a proposed classification and one for an existing classified area. Work is ongoing on four more desktop studies.

The shoreline surveys include walking the entire harvesting area and, in some cases, 'upstream' of it to confirm the location of the major sources identified in the desktop but also to identify any previously unrecorded sources also. Sampling of water courses, shellfish, sea water and discharges may also constitute part of the shoreline survey. Data is written up in the field during the survey and post survey is transferred into excel database format and forwarded to the contracted agency for extrapolation and mapping. Upon completion of the shoreline element and once all data has been forwarded, the agency will complete the sanitary survey in all its constituent parts. The report will include recommended monitoring points, boundaries or zones and a sampling plan. The audit team were informed that prior to the appointment of the contracted agency to expedite the process the SFPA had conducted considerable background shoreline survey work within six harvesting areas. The sources of potential faecal contamination are identified, their location recorded and photographed with the data obtained being recorded electronically. At the time of the audit no SOP had been developed to regularise the approach to sanitary surveys and to ensure the consistency of data being recorded.

4.2.4 Sampling plans

Annex II Chapter II B of Regulation 854/2004 requires that the competent authority shall monitor classified relaying and production areas.

Section 2 of the COP for the Microbiological Monitoring of Bivalve Mollusc Production Areas documents the SFPA approach to the development of sampling plans for classified shellfish production areas. The sampling plan is the basis of the microbiological monitoring programme of classified shellfish production areas. It must ensure that the results of the analysis carried out will be as representative as possible for the area considered.

Representative sampling points should reflect the location at highest risk of faecal pollution within a classified production area. To determine this, a sanitary survey of the area should be undertaken. Sanitary surveys involve the identification of potential sources of faecal contamination of bivalve mollusc harvesting areas and an assessment of the likely impact of the sources on the microbiological quality of the fisheries.

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The audit team reviewed the sampling plans developed to monitor classified and production areas for 2017 and 2018.

The plans are broken down into yearly and quarterly targets. Figures 1A and 1B give an overview of the target number of samples to be taken and the actual number of samples taken. Samples taken typically exceeded 95% of targets.

Figure 1A: Number of samples tested 2017

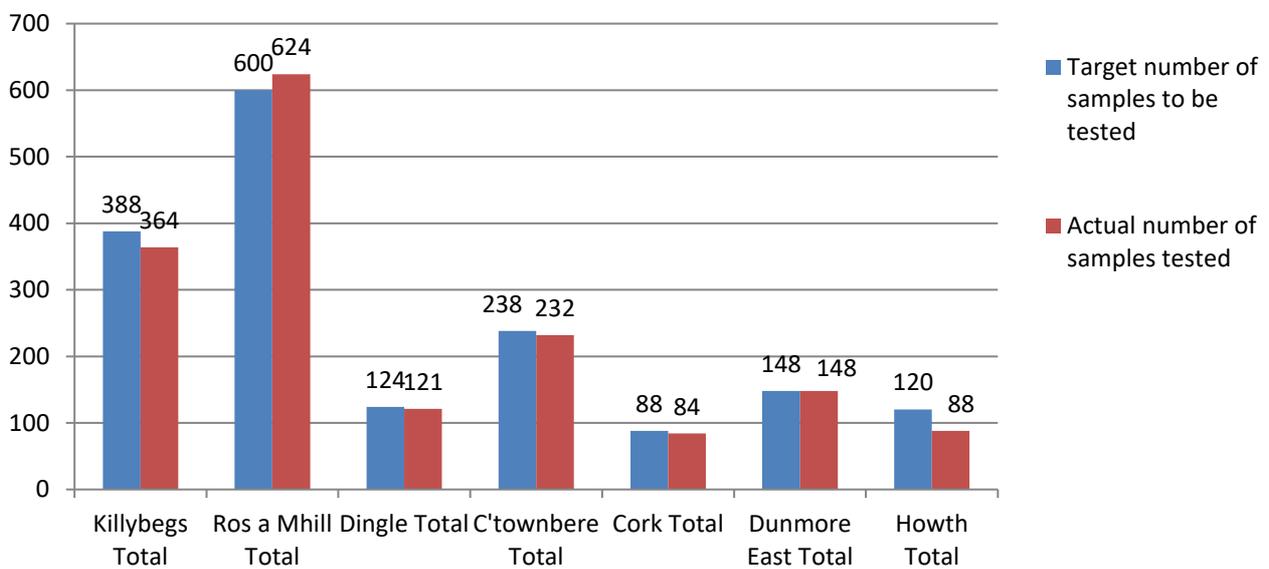
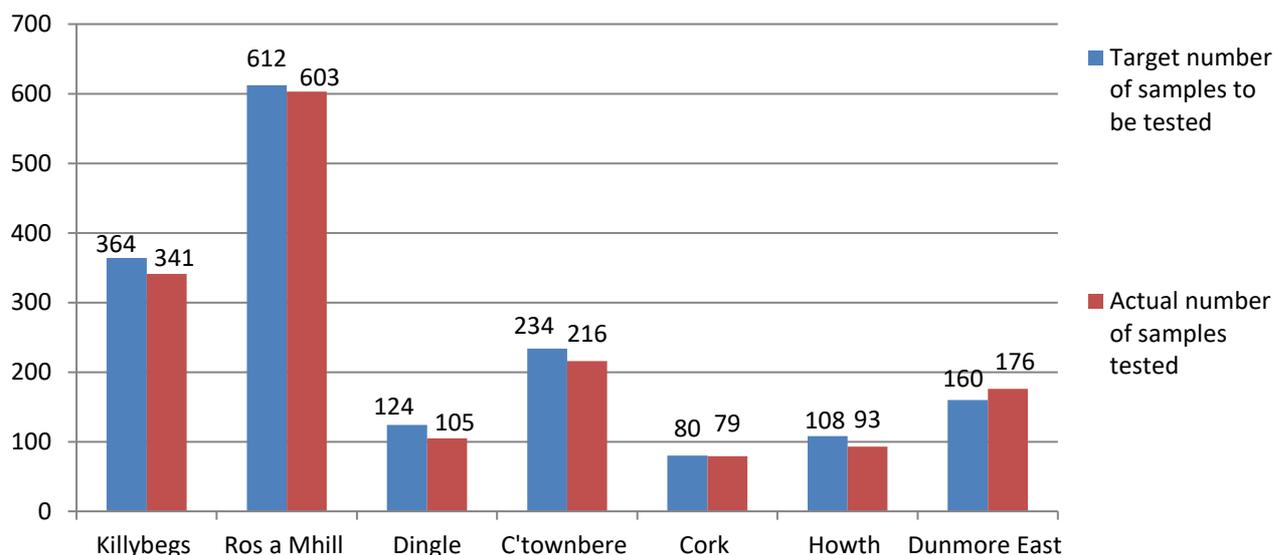


Figure 1B: Number of samples tested in 2018



The reasons for samples not being taken include adverse weather conditions, the harvesting area was not being fished at the time or SFPO's being unavailable due to the pressing nature of other control duties. The audit team followed up where samples had not been taken and concluded that the overall classification of a production was not adversely affected by samples not being taken and therefore there was no threat to public health.

4.2.5 Sampling

Annex II, Chapter II, C of regulation 854 /2004 details the responsibilities of Competent Authorities regarding Decisions after Monitoring. Section 5.2 of the COP specifies that the Shellfish Coordinator communicate results of sampling to all members of the MSSC and dissemination of out of range results.

The audit team reviewed the minutes of relevant MSSC meetings and noted that the shellfish coordinator as a standing item updates the members on sampling activities for the period under review. The audit team verified that the dissemination of out of range results is completed using the "Shellsan Elevated Micro Result Report". The team randomly selected several out of range results and found that a "Shellsan Elevated Micro Result Report" had been generated by the Shellfish Coordinator for each and follow up undertaken in the relevant Port Office. Of the out of range samples reviewed by the audit team, one was rejected by the receiving laboratory as the minimum temperature of 15°C had been exceeded.⁴

⁴The audit team were subsequently provided with documentation to confirm that follow up samples were taken within three weeks the results of which did not affect the classification of the production area in question.

4.2.6 Sampling procedure

Appendix 9.2 to the COP describe the procedures to be followed when taking samples and their transport to the laboratory.

The procedure specifies that samples must be accompanied by a Shellfish Sample Advice Note which includes the following information:

- Sample point identification number and name.
- Time and date of collection.
- Species.
- Method of collection (hand-picked, dredged, etc).
- Any other information deemed relevant (e.g. unusual events, adverse weather conditions, seawater temperature etc.) may also be recorded.

The maximum elapsed time between sampling and arrival at the laboratory must be 48 hours and the temperature on receipt in the laboratory must be <15°C unless the transit time from sampling to arrival at the laboratory is <4 hours.

In one port the audit team observed an SFPO taking an official control sample. All the required information was included on the Shellfish Sample Advice Note and the procedure described in the COP for taking samples was followed.

4.2.7 Classification review procedures

Section 6.5 of the COP states that the classified areas will be reviewed annually.

The audit team verified that review of classification meetings took place in June 2017 and June 2018. Detailed minutes record the discussions which took place at the meetings and that the data set for consideration where a review of classification was proposed comprised of the previous three calendar years information. Information included in the review process includes recommendations for the declassification of lapsed production sites or changes to production area status where results indicate an improvement or reduction in the microbiological quality for the period under consideration.

5. Conclusions

Annex II Chapter II of Regulation 854/2004 sets out the official controls concerning live bivalve molluscs from classified production areas. The Code of Practice for the Microbiological Monitoring of Bivalve Mollusc Production Areas provides guidance on how to comply with these requirements. There is a structured approach to the official controls undertaken by the SFPA under this legislation. An annual food safety control plan provides a baseline framework for the official controls carried out by the SFPA's staff. Section 2.4 of the plans detail how official controls are conducted regarding the scope of this audit. Staff performing these controls use guidance contained in documented procedures and have the legal powers to enforce the relevant legislation. SFPA carries out internal audits to ensure official controls are achieving the requirements of Regulation 852/2004.

Detailed sampling plans for production areas are in place, follow up is taken when out of range results are detected and there is an annual review of the overall classification status of each area. However sanitary surveys have not yet been completed for all newly classified or existing production areas. Currently there is a programme in place to complete 10 such surveys.

6. Findings

In April 2019, the official agency had completed two desktop interim reports and four more desktop studies were nearing completion. No overall programme has been documented as to when all sanitary surveys will be completed.

At the time of the audit no standard operating procedure had been developed to regularise the approach to sanitary surveys and to ensure the consistency of data being recorded.



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