

AUDIT  
REPORT

Targeted Audit of the  
Controls that Prevent  
Animal By-Products from  
Entering the Food Chain

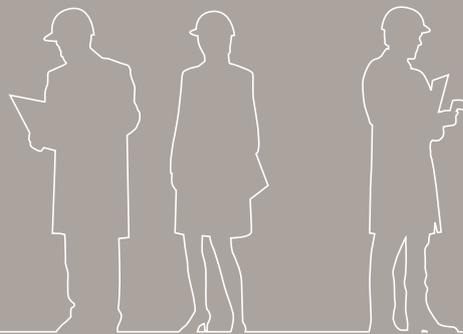
APRIL 2017



# AUDIT REPORT

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## 1. GLOSSARY

ABP	Animal By-Products
DAFM	Department of Agriculture, Food and the Marine
FSAI	Food Safety Authority of Ireland

## 2. EXECUTIVE SUMMARY

The FSAI carries out targeted audits of food businesses to determine the level of compliance with food law and the effectiveness of its implementation. In addition, the FSAI can inspect any other type of business it considers necessary for the discharge of its functions under the FSAI Act. The overall objective of this audit is to assess the controls in businesses involved in the harvesting and distribution of animal by-products (ABPs) so as to verify that this material is consistently and reliably excluded from the human food supply chain and is disposed of appropriately. In particular, the audit focused on the sale of ABP to establishments feeding ABP meat to dogs, e.g. hunts and greyhound owners and how the business operators in this sector of the ABP supply chain complied with their legal requirements.

ABPs are categorised according to their risk using the basic principles in [Regulation \(EC\) 1069/2009](#).

**Category 1 ABPs** include carcasses and all body parts of animals suspected of being infected with Transmissible Spongiform Encephalopathy (TSE), carcasses of wild animals suspected of being infected with a disease that humans or animals could contract, specified risk material (body parts that pose a particular disease risk, e.g. cows' brains and spinal cords).

**Category 2 ABPs** include dead or 'fallen' animals, manure, animals rejected from abattoirs due to having infectious diseases, carcasses containing residues from authorised treatments, carcasses of animals killed for disease control purposes etc.

**Category 3 ABPs** include carcasses or body parts passed fit for human consumption at a slaughterhouse, products or foods of animal origin originally meant for human consumption but withdrawn for commercial reasons, (not because it's unfit to eat) domestic catering waste, hides and skins from slaughterhouses and processed animal proteins.

To facilitate traditional practices, EU legislation provides derogation for operators to allow them to feed Category 2 material to animals such as greyhounds and hunting dogs provided that two specific conditions have been met:

1. Such material comes from animals which were not killed or did not die as a result of the presence or suspected presence of a disease communicable to humans or animals, subject to compliance with the general laid down in Section 1 of Chapter II of Annex VI of Regulation 142/2011 and
2. Any other conditions that may be laid down by the competent authority

In accordance with point 2, the Department of Agriculture, Food and Marine (DAFM) has determined that operators of intermediate plants (commonly known as knackeries) supplying Category 2 ABP material to final users for feeding to dogs, must ensure that the ABP undergoes denaturation by staining or by boiling. This audit project involved a series of inspections in intermediate plants, hauliers, establishments feeding ABP meat to dogs (hunts and greyhound owners), a hide store and a rendering plant, to verify the system in place to control animal by-products.

Eleven intermediate plants were audited: one establishment was no longer harvesting meat and the business operator was not available at another establishment so the audit team could not ascertain if harvesting of meat was continuing. ABP meat intended for feeding to dogs and sold off site originating from eight establishments was audited. Three establishments were harvesting meat for feeding to their own dogs only.

The activities carried out in three intermediate plants were not reflected in the activities listed in the publically available list on the DAFM website. In addition, the description of the activities for three establishments is different

on two DAFM website listings<sup>1</sup>. The audit team had access to documentation and traceability information at nine intermediate plants. In all establishments, efforts were being made by the businesses to maintain records, nevertheless, reconciliation of records was not possible. In one intermediate plant in particular, there were significant non-compliances in relation to traceability, there were no documented procedures in place and the business operator did not have a record of the stock held on-site.

In another intermediate plant, which was physically attached to two other establishments - a dog breeding establishment and a haulier business, there was no information available regarding the physical demarcation between the different businesses. A record of the stock held on-site was not available and different commercial arrangements were in place with different hauliers to transport the ABP which made traceability very difficult to verify.<sup>2</sup>

The audit team inspected three intermediate plants that use ABP for feeding to their own dogs only. Of those three establishments, two establishments used very little dye but dye was present on-site and one establishment was compliant with the dyeing requirements.

In terms of denaturing, labelling and supplying ABP for feeding, different practices were found. One intermediate plant sprayed the whole carcass, and as a result, very little dye was evident on the chopped ABP. In two establishments, when samples of bagged minced ABP meat were taken from the freezer/chill and opened, there was no dye on the minced meat. Three establishments delivered chopped ABP in barrels or wheelbarrows to establishments that feed ABP meat to dogs and the ABP was not bagged. One intermediate plant delivered carcass sides and legs with no denaturing to an establishment feeding ABP meat to dogs.<sup>3</sup>

Evidence of carcasses that had been eviscerated was seen in one intermediate plant which is strictly prohibited. In another establishment, significant volumes of tripe, packed in plastic bags, were stored in a large refrigerated container and there was no traceability documentation available to document where it came from.<sup>4</sup>

The following non-compliances were found in the establishments feeding ABP meat to dogs

- Large pieces of ABP inadequately stained
- Bones and carcass sides/quarters were fed to greyhounds
- Large pieces of ABP meat delivered in barrels and lightly sprayed with dye
- Unstained bovine legs and equine sides delivered in a trailer to a hunt for feeding to hounds<sup>5</sup>

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<sup>1</sup> DAFM has indicated, with regard to the reference in the report to two DAFM website listings, that the list of approved knackeries and the list of approved collection centres are being updated so that all relevant activities are recorded. It should be noted that where a plant ceases an activity, there can be a delay in notifying DAFM and as a consequence, in updating lists. See full DAFM response at Annex II.

<sup>2</sup> Specific non-compliances reported in individual plants are being or will be followed up by DAFM with the plants concerned. Appropriate action will be taken in accordance with EU and national ABP legislation and conditions of approval, with a view to addressing the underlying issues and preventing recurrence.

<sup>3</sup> DAFM has introduced updated conditions of approval (January 2017). These include, in particular, a requirement for a plant-level SOP to standardise the approach to meat harvesting, staining etc. in collection centres.

<sup>4</sup> The effectiveness of official controls has been reviewed by DAFM and plans a significant increase in 2017 in the number of controls (inspections and audits), including unannounced visits, at each knackery/collection centre.

<sup>5</sup> See footnote <sup>2</sup>

There are no business procedures or official controls in place to check the requirement “The plant is authorised for the collection of Category 2 material, provided that it comes from animals which were not killed or did not die as a result of the presence or suspected presence of a disease communicable to humans or animals, and of Category 3 material for feeding to dogs only”.<sup>6</sup>

Re-processing of Category 3 meats was seen in two establishments that were feeding ABP meat to dogs. The meat was labelled with the meat establishment’s approval mark indicating it was fit for human consumption rather than being readily identifiable as Category 3 ABP.<sup>7</sup>

Animal by-products are materials of animal origin that are not intended for human consumption and which should be excluded from the human food supply chain, so that they will not be consumed by people. ABP Regulations set down the rules for these products, in order to prevent and minimise risks to public and animal health. The audit team identified many examples of practices which were non-compliant with the legal requirements and the ministerial conditions laid down by DAFM. Fundamental deficiencies relating to the staining and labelling of products were identified.<sup>8</sup>

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<sup>6</sup> DAFM understands the derogation in Art 18(1) of Regulation (EC) 1069/09, as supplemented by the provision about communicable disease in Art 13(1) of Regulation (EU) 142/2011, was put in place with the intention of facilitating longstanding ABP meat-harvesting and feeding practice in Ireland and the UK in particular, while mitigating associated risk. The practice is recognised as an important economic support for the sector and in particular for the greyhound industry which is worth c€500m pa to the economy. It also helps keep down the cost to farmers of fallen animal collection. Meat is not harvested from animals culled/killed as part of any disease control/eradication programme. DAFM has commissioned a survey of pathogens that may be present in knackeries. This study is being carried out by the DAFM laboratories and by University College Dublin. The final report will be available in 2017. It is expected that this will assist in filling a current information deficit about areas of risk and, in turn, inform specific proposals to address same. These could include additional labelling requirements or alternative treatments to staining for some meat categories; or exclusion of some categories of fallen animal. Based on the results of this survey, DAFM will review the need for further controls at knackeries with the aim of minimising any risk.

<sup>7</sup> A new Veterinary Procedural Notice (VPN) has been drawn up to enhance controls of ABPs at slaughter houses and meat establishments supervised by the Veterinary Public Health Inspection Service (VPHIS) of DAFM. Specifically, new requirements and procedures are being put in place for the VPHIS-supervised plants that wish to provide Category 3 meat to dogs and other animals specified under the derogation set out in Article 18 of the animal by-products regulation (EU Regulation 1069/2009). DAFM is of the view that the new procedures will assist greatly in ensuring that the non-compliances that were identified during the FSAI audit in relation to Category 3 meat will be minimised. DAFM will engage with veterinary staff responsible for supervising local authority slaughter houses with a view to putting similar procedures in place.

<sup>8</sup> See full DAFM response at Annex II.

### 3. INTRODUCTION

The FSAI carries out targeted audits of food businesses to determine the level of compliance with food law and the effectiveness of its implementation. In addition, the FSAI may inspect any other type of business it considers necessary for the discharge of its functions under the FSAI Act. This audit examined the compliance of business that harvest and/or market ABPs.

Animal by-products are materials of animal origin that are not intended for human consumption and which should be excluded from the human food supply chain. ABPs include, among others:

- Materials rejected as unfit for human consumption and materials excluded from the human food supply chain for commercial reasons
- Processed animal proteins used for animal feed, e.g. fishmeal
- Organic fertilisers and soil improvers, e.g. processed organic fertiliser and soil improvers on the base of processed animal protein
- Technical products, e.g. pet food, hides and skins for leather, wool, blood for producing diagnostic tools

ABP Regulations set down public health and animal health rules for animal by-products and derived products, in order to prevent and minimise risks to public and animal health arising from those products. In particular, the rules aim to ensure that those products do not re-enter the food chain. ABPs can lead to the spread animal diseases, e.g. Bovine Spongiform Encephalopathy (BSE), or the contamination of the food chain with chemicals, e.g. dioxins, and can be dangerous to animal and human health if not properly disposed of. EU rules regulate their movement, processing and disposal.

ABPs are categorised according to their risk using the basic principles in [Regulation \(EC\) 1069/2009](#).

#### Category 1 ABPs

They include carcasses and all body parts of animals suspected of being infected with Transmissible Spongiform Encephalopathy (TSE), carcasses of wild animals suspected of being infected with a disease that humans or animals could contract, carcasses of animals used in experiments and parts of animals that are contaminated due to illegal treatments and specified risk material (body parts that pose a particular disease risk, e.g. cows' brains and spinal cords)

#### Category 2 ABPs

They include dead or 'fallen' animals, manure, animals rejected from abattoirs due to having infectious diseases, carcasses containing residues from authorised treatments, carcasses of animals killed for disease control purposes etc.

#### Category 3 ABPs

They include carcasses or body parts passed fit for human consumption at a slaughterhouse, products or foods of animal origin originally meant for human consumption but withdrawn for commercial reasons, not because it's unfit to eat, domestic catering waste, hides and skins from slaughterhouses and processed animal proteins.

### Derogation

To facilitate traditional practices, EU legislation provides derogation for operators to allow them to feed Category 2 material to animals such as greyhounds and hunting dogs, provided that two specific conditions have been met:

1. Such material comes from animals which were not killed or did not die as a result of the presence or suspected presence of a disease communicable to humans or animals, subject to compliance with the general rules laid down in Section 1 of Chapter II of Annex VI of Regulation 142/2011 and
2. Any other conditions that may be laid down by the competent authority

In accordance with point 2, the competent authority in the Republic of Ireland has determined that operators of collection centres<sup>9</sup> supplying Category 2 ABP material to final users, for feeding to dogs, must ensure that it undergoes one of the following treatments:

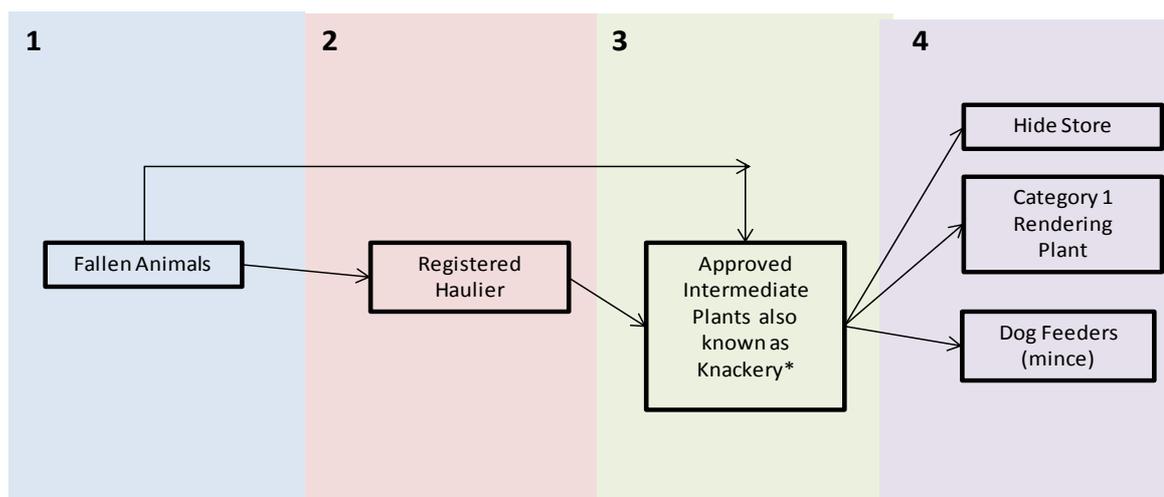
- (a) Denaturing with a solution of a colouring agent; the solution must be of such a strength that the colouring on the stained material is clearly visible and does not disappear when the coloured materials are subject to freezing or chilling, and the whole surface of all pieces of material must have been covered with such solution either by immersing the material in, or spraying or otherwise applying the solution
- (b) Sterilisation by boiling or steaming under pressure until every piece of material is cooked throughout or
- (c) Any other handling or treatment authorised by the competent authority responsible for the operator

The only treatment permitted in the Republic of Ireland is (a) denaturation by a colouring agent, i.e. staining or boiling.

Figure 1 explains the how animals that die on farms (fallen animals) move through the ABP system to disposal.

In addition, a description of Terms is included in Annex I of the report.

**Figure 1. Fallen Animals Supply Chain**



<sup>9</sup> When an intermediate plant is approved to supply meat to establishments feeding ABP meat to dogs, it is referred to in addition as a collection centre.

### 3.1 Audit Objective

The overall objective of the audit was to assess the controls in businesses involved in the harvesting and distribution of ABP so as to verify that this material is consistently and reliably excluded from the human food supply chain and is disposed of appropriately. In particular, the audit focused on the sale of ABP to establishments feeding ABP meat to dogs, e.g. hunts and greyhound owners and how the business operators in this sector of the ABP supply chain complied with their legal requirements.

### 3.2 Audit Scope

The audit project involved a series of inspections in intermediate plants, hauliers, establishments feeding ABP meat to dogs, hide store and a rendering plant to verify the system in place to control animal by-products.

During each audit, the team assessed whether business operators were complying with the criteria against which the audit was being carried out.

### 3.3 Audit Criteria and Reference Documents

This audit was carried out under Section 47 of the Food Safety Authority of Ireland Act, 1998 (FSAI Act). Section 47 of the of the, as amended by the British Irish Agreement Act, 1999 which states: “the Authority may...carry out or arrange to have carried out such additional inspections as it considers necessary for the discharge of its functions under this Act”.

The principal audit criteria referred to during the audit were:

- [Regulation \(EC\) No 1069 of 2009](#) laying down health rules as regards animal by-products and derived products not intended for human consumption
- Commission Regulation (EU) No 142/2011 of 25 February 2011 implementing Regulation (EC) No 1069/2009 of the European Parliament and of the Council laying down health rules as regards animal by-products and derived products not intended for human consumption and implementing Council Directive 97/78/EC as regards certain samples and items exempt from veterinary checks at the border under that Directive (Article 17 & Chapters I, II, III & IV (Section 1 only) of Annex VIII only in so far as they relate to food safety)
- [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
- All relevant Statutory Instruments transposing the above legislation
- Ministerial conditions laid down by the DAFM on business operators (referred to by DAFM as CN documents)
- European Union (Animal By-Products) Regulations, 2014 ([S.I. No. 187 of 2014](#))

**In particular, this audit focused on:**

- Regulation (EC) No 1069 of 2009 - Article 13: Requirements for the Disposal and Use of Category 2 Material
- Regulation (EC) No 1069 of 2009 - Article 18: Derogation from Article 13 and 14 for Special Feeding Purposes
- Regulation (EU) No 142 of 2011 - Article 13: Special Feeding Rules

## 3.4 Audit Methodology

This audit was undertaken using documented procedures which are included in the FSAI Quality 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.

## 4. AUDIT FINDINGS

### 4.1 Intermediate Plants and Collection Centres (CN 12 and CN 24C)

Table 1 summarises the audit activity in intermediate plants and collection centres. When an intermediate plant is approved to supply meat to an establishments feeding ABP meat to dogs, it is also referred to as a collection centre. Eleven intermediate plants were audited: one establishment was no longer harvesting meat and the business operator was not available at another establishment so the audit team could not ascertain if harvesting of meat was continuing. ABP meat intended for feeding to dogs and sold off site originating from eight establishments was audited. Three establishments were harvesting meat for feeding to their own dogs only.

**Table 1. Summary of Audit Activity\***

Number of approved Intermediate plants and collection centres audited*	11
Number of collection centres harvesting ABP for sale	6
Number of collection centres harvesting ABP for feeding own dogs only	3
Number of establishment approved as a collection centre but no longer harvesting meat	1
Number of establishments where the business operator was not available – audit team could not ascertain if harvesting ABP for sale	1

\* Harvested ABP from two collection centres that were not audited was seen at two establishments feeding ABP meat to dogs and findings in relation to that ABP are also included in this report.

### 4.1.1 Approval

#### Legal Requirements

##### Regulation 1069/2009 Article 24

Operators shall ensure that establishments or plants under their control are approved by the competent authority, where such establishments or plants carry out one or more of the following activities:

- (h) Handling of animal by-products after their collection, by way of operations such as sorting, cutting, chilling, freezing, salting, removal of hides and skins or of specified risk material
- (i) Storage of animal by-products

##### Ministerial Conditions Requirements Section 1 of CN 12

A plant involved in handling Animal By-Products (ABP) or carrying out intermediate operations (as defined in Article 2 of Regulation (EU) No 142/2011) following their collection must be approved by the Department of Agriculture, Food and the Marine (DAFM) and the approval must be in date (Article 24 (h) and (i) of Regulation (EC) No 1069/2009).

The operator must notify DAFM immediately if significant changes are proposed to plant activities.

The operator must notify DAFM immediately if the plant is no longer to be used for handling ABP. The plant must be decommissioned at this time and prior to use for any other activity. The operator will organise the decommissioning of the plant and clean-up of the site and buildings as well as safe disposal of all equipment in a reasonable time period, under the supervision of DAFM.

#### Findings

DAFM provides a public listing of intermediate plants (Section I) and collections centres (Section (XI) and their associated activities on the DAFM website: <https://www.agriculture.gov.ie/agri-foodindustry/animalbyproducts/euapprovedabpplants/>

The audit reviewed the approvals of ten intermediate plants. The activities carried out in three establishments were not reflected in the activities listed in the publically available approval list on the DAFM website. In addition, the description of the activities for three establishments is different on two DAFM website listings.<sup>10</sup> These findings are summarised in Table 2.

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<sup>10</sup> DAFM has indicated that the list of approved knackeries and the list of approved collection centres are being updated so that all relevant activities are recorded. It should be noted that where a plant ceases an activity, there can be a delay in notifying DAFM and as a consequence, in updating lists. See full DAFM response at Annex II.

**Table 2. Approvals and Activities in Intermediate Plants and Collection Centres**

Intermediate Plant/Collection Centre	Activities
One establishment	No COLC or UDOG <sup>11</sup> listed
One establishment	No UDOG listed in activity – mince fed to dogs
One establishment	Not mincing since Feb/March 2016 and approval says COLC
Three establishments	Different descriptions on DAFM lists

#### 4.1.2 Biosecurity plant structure, hygiene and transport

##### Legal Requirements

##### Regulation 1069/2009 Article 25

1. Operators shall ensure that establishments or plants under their control carrying out the activities referred to in Article 24(1)(a) and (h):

- (a) are constructed in a way permitting their effective cleaning and disinfection and where appropriate the construction of floors facilitates the draining of liquids;
- (b) have access to adequate facilities for personal hygiene such as lavatories, changing rooms and washbasins for staff;
- (c) have appropriate arrangements for protection against pests, such as insects, rodents and birds;
- (d) keep installations and equipment in good condition and ensure that measuring equipment is calibrated regularly; and
- (e) have appropriate arrangements for the cleaning and the disinfection of containers and vehicles in place to avoid risks of contamination.

2. Any person working in the establishment or plant referred to in paragraph 1 shall wear suitable, clean and, where necessary, protective clothing.

##### Ministerial Conditions Requirements Section 2 of CN12

##### Buildings and Structure

- There must be a sufficiently large covered space to receive, handle and store the ABP. All ABP must be under cover.
- All buildings must be maintained clean and in good condition and any necessary repairs must be made on a regular basis.
- The floors must be smooth and sloped to facilitate the drainage of liquids. The inner walls must be smooth, clean and well maintained.
- The layout of plants must ensure the total separation of Category 3 material, i.e. hides, from all other materials until dispatch.

<sup>11</sup> COLC = Collection Centre (for collecting meat to feed dogs, for sale)

UDOG = Harvesting and feeding dogs on-site

- The plant must be designed and personnel must work so as to assure adequate separation of the handling of materials for different end-usage destinations.
- There must be adequate separation between the area of the plant where incoming material for handling is unloaded and the areas set aside for the storage of products.
- Suitable office facilities where an examination of records can take place must be provided on-site and be made available to DAFM staff. Satisfactory office facilities must be provided to ensure a suitable environment for DAFM officers engaged in TSE sampling, i.e. it must be weatherproof, adequately lit, capable of being heated and have storage space for supplies. A system for the disposal of used sampling gloves, overalls etc. must be provided.

### Plant Hygiene

- The operator must ensure that a hygiene plan has been designed and implemented effectively for all areas of the plant. A power washer or equivalent must be available at all times to enable collection vehicles to be washed on leaving the knackery.
- All handling and storage locations and equipment must be emptied and cleaned regularly to the extent necessary to ensure hygienic practice.

### Transport and Signage

- Collection vehicles (for carcasses) must be dedicated to the carriage of Category 2 Material (ABP) and must be permanently and prominently marked on both sides with:
- Haulier registration code and receptacle number
- "CATEGORY 2 Material Not For Animal consumption"

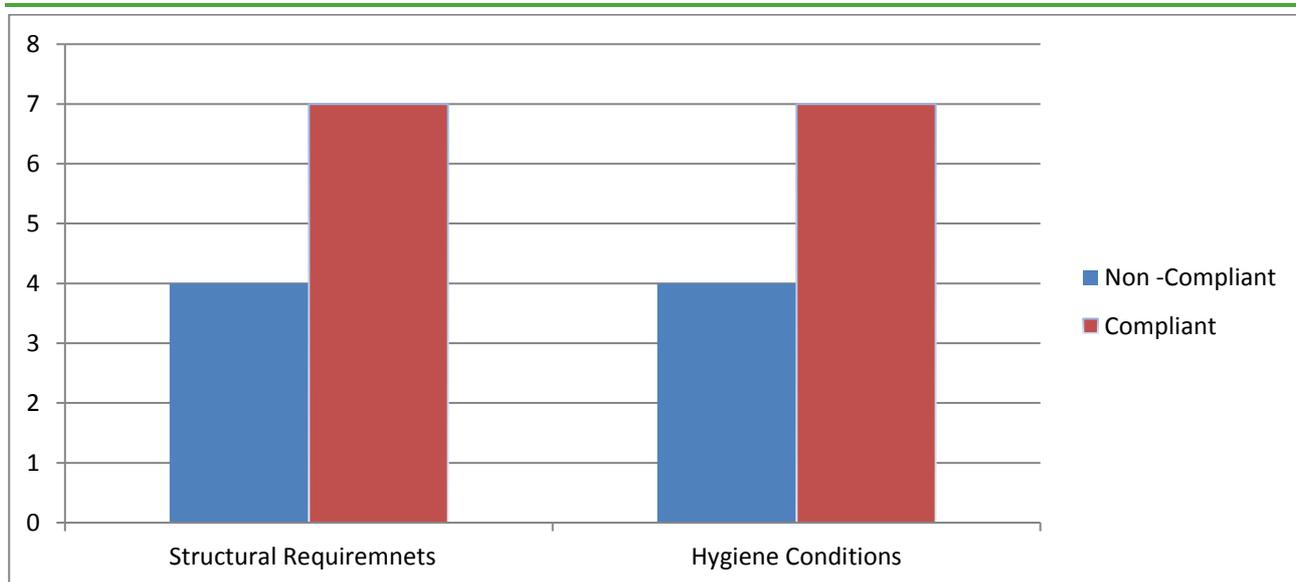
### Findings

Eleven intermediate plants/collection centres were audited. In four establishments, there were significant non-compliances with regard to the structural requirements. In one of these establishments, there was a large refrigerated food grade transport vehicle used for transporting ABP which was not marked as an ABP transport container as required. A summary of the findings is shown in Figure 2.<sup>12</sup>

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<sup>12</sup> Specific non-compliances reported in individual plants are being or will be followed up by DAFM with the plants concerned. Appropriate action will be taken in accordance with EU and national ABP legislation, and conditions of approval, with a view to addressing the underlying issues and preventing recurrence.

Figure 2. Structure and Hygiene Findings at Intermediate Plants/Collection Centres



### 4.1.3 Identification and traceability

#### Legal Requirements

##### Regulation 1069 / 2009 Article 21 &22

Operators shall collect, identify and transport animal by-products without undue delay under conditions which prevent risks arising to public and animal health.

Operators shall ensure that animal by-products and derived products are accompanied during transport by a commercial document or, when required by this Regulation or by a measure adopted in accordance with paragraph 6, by a health certificate.

Operators consigning, transporting or receiving animal by-products or derived products shall keep a record of consignments and related commercial documents or health certificates.

##### Regulation 142/ 2011 Article 17

Operators shall ensure that animal by-products and derived products:

- (a) comply with the requirements for collection, transport and identification set out in Chapters I and II of Annex VIII;
- (b) are accompanied during transport by commercial documents or health certificates in accordance with the requirements set out in Chapter III of Annex VIII.

##### Ministerial Conditions Requirements Section 3 CN12 - Collection Centre Only

Collection centres preparing ABP for feed must establish a system of record-keeping that can demonstrate on any given date, the quantity of:

- Material for feeding within storage (stock control record)
- Material prepared for feeding, i.e. that has undergone treatment on any given date. This record must describe the quantity of this material that went for sale, the quantity that has been placed in storage and the quantity of material disposed of as waste

- **Material sold to specific licensed end-users on any given date. This record must be maintained in a way that it provides, at a glance, the cumulative annual quantity of meat, at any time, that has been provided to each specific licensed end-user. The record must incorporate the name, license number and date of issue of each licence**
- **Feed material disposed as waste, i.e. placed in the skip, and the dates of placing said material in the skip**

Reconciliation on these records must be convenient to carry out.

### Collection Centre Only

The operator must retain a record containing all receipts for purchase of stain for meat.

### Findings

The audit team accessed documentation and traceability information at nine intermediate plants and collection centres. In all establishments, efforts were being made by the businesses to maintain records, nevertheless reconciliation of records was not possible. In one collection centre in particular, there were significant non-compliances in relation to traceability, there were no documented procedures in place and the business operator did not have a record of the stock held on-site.

In another collection centre, which was physically attached to two other establishments – a dog breeding establishment and a haulier business, there was no information available regarding the physical demarcation between the different businesses. A record of the stock held on-site was not available and different commercial arrangements were in place with hauliers to transport the ABP which made traceability very difficult to verify.<sup>13</sup>

## 4.1.4 Handling, processing and staining and labelling of ABP for dog feed

### Legal Requirements

#### Regulation 142/2011 Article 13

1. **Operators may feed Category 2 material to the following animals, provided that such material comes from animals which were not killed or did not die as a result of the presence or suspected presence of a disease communicable to humans or animals, subject to compliance with the general requirements laid down in Section 1 of Chapter II of Annex VI and any other conditions that may be laid down by the competent authority;**
  - (a) Zoo animals
  - (b) Fur animals
  - (c) Dogs from recognised kennels or packs of hounds
  - (d) Dogs and cats in shelters
  - (e) Maggots and worms for fishing bait

#### Regulation 142 /2009 Section 1 of Chapter II of Annex VI

4. **Operators of collection centres supplying material, other than animal by-products originating from aquatic animals and from aquatic invertebrates, to final users must ensure that it undergoes one of the following treatments:**

- (a) **Denaturing with a solution of a colouring agent; the solution must be of such a strength that the colouring on the stained material is clearly visible and does not disappear when the coloured materials are subject to freezing or chilling, and the whole surface of all pieces of material must have been covered with such solution either by immersing the material in, or spraying or otherwise applying the solution;**

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<sup>13</sup> See footnote <sup>12</sup>.

(b) Sterilisation by boiling or steaming under pressure until every piece of material is cooked throughout;  
or

(c) Any other handling or treatment authorised by the competent authority responsible for the operator

### Ministerial Conditions Requirements Section 2 CN12 Labelling requirements

All meat prepared for feeding must comply with the following:

A feed material or compound feed shall not be placed on the market unless the following particulars are indicated by labelling the:

- a) Type of feed: 'feed material', 'complete feed' or 'complementary feed'  
- for pets other than cats and dogs, 'complete feed' or 'complementary feed' may be replaced by 'compound feed'
- b) Name or business name and the address of the feed operator responsible for the labelling
- c) Establishment approval number of the person responsible for the labelling
- d) Batch or lot reference number
- e) Net quantity expressed in units of mass in the case of solid products
- f) Safety information

### Ministerial Conditions Requirements Section 4 CN12 Processing and Handling requirements

#### Collection Centre Only

Meat for feeding must be prepared as pieces of ABP or as mince. Bones including skulls or whole limbs must not be included.

#### Collection Centre Only

Following the preparation of meat ABP for feeding to packs of hounds, dogs in shelters, this product must be stored under suitably chilled or frozen conditions.

#### Collection Centre Only

Operators of authorised collection centres supplying relevant material other than fish offal to final users must ensure that the material being sold/supplied undergoes one of the following treatments:

- Denaturing/staining with a solution of a green/blue colouring agent which is clearly visible even when product is frozen
- Sterilisation, by boiling or steaming under pressure, of the material until every piece is cooked throughout
- Any other treatment approved by DAFM

#### Collection Centre Only

The operator must have a detailed written treatment protocol to describe the treatment of material, e.g. boiling, for feeding. This protocol must be implemented. This protocol must have been approved in action by a DAFM authorised officer and should be modified only in consultation with a DAFM authorised officer.

#### Collection Centre Only

For staining/dying:

- The dye solution must be of such strength that the staining is clearly visible
- All surfaces of the material must be visibly dyed with the dye solution
- Adequate staining of minced meat can be achieved by spraying all surfaces of a transparent bag with stain and then adding the meat and massaging the bag into the meat
- Immersion, spraying or other methods may be used also. Experience has shown that freezing will change the colour of the stain and its distribution in the meat, leaving all visible surfaces not clearly stained

- Where bags are frozen all visible surfaces do not need to carry stain as long as the meat is obviously stained

### Collection Centre Only

Equipment used to mince or prepare feed, vehicles and reusable containers, and all reusable items or appliances that come into contact with feed, must be maintained in a clean condition.

### Ministerial Conditions Requirements Processing /Handling CN 24C

Deliveries of meat ABP from authorised collection centres to meat feeders must be on a pre-order, point-to-point basis. The meat ABP must be pre-ordered and must be delivered directly from the collection centre to the meat feeder.

Pre-orders must be taken by e-mail (preferable) or by phone. A log must be kept that lists the:

- Meat feeder licence number
- Name and address of the meat feeder
- Date the order was received
- Volume of meat ABP ordered

Meat ABP must be bagged and properly stained by the collection centre as set out by DAFM in the collection centre conditions. Receipts for purchases of stain must be kept for three years.

### Findings

The audit team inspected three establishments that use ABP to feed their own dogs only. Of these three establishments, two establishments used very little dye but dye was present on-site and one establishment was compliant with the dyeing requirements.

Eight of the ABP collection centres inspected were supplying ABP to other locations. Of these, two were compliant and six were non-compliant with legal requirements relating to this type of business operation.

One establishment sprayed the whole carcass, the carcass was then chopped up and meat transported in wheelbarrows to the hunt located beside the collection centre. In two establishments, when samples of bagged minced meat ABP were taken from the freezer/chill and opened, there was no dye visible on the minced meat. Three establishments delivered chopped ABP in barrels or wheelbarrows to establishments feeding ABP meat to dogs and the ABP was not bagged. One collection centre delivered carcass sides and legs with no denaturing to an establishment feeding ABP meat to dogs.<sup>14</sup>

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<sup>14</sup> DAFM has introduced updated conditions of approval (January 2017). These include, in particular, a requirement for a plant-level SOP to standardise the approach to meat harvesting, staining etc. in collection centres. DAFM arranged meetings with knackery operators in November 2016 with a view to raising awareness of the need for high standards at knackeries. DAFM highlighted the new conditions and the need for a high level of compliance.

**Table 3. Summary of Establishments Handling and Denaturing ABP**

<b>Number of establishments marketing ABP for meat feeding off site</b>	One spraying dye on the surface of full carcasses
	Two selling minced ABP meat off site in bags but product not denatured/stained with dye.
	Two ABP meat sprayed with some dye in barrels and product not packaged in bags
	One supplying carcass sides but no denaturing/staining with dye
	Two fully compliant

#### 4.1.5 Miscellaneous issues found in intermediate plants and collection centres

##### Legal requirements

##### Ministerial Conditions Requirements Section 1 Processing/Handling CN 12

The operator and operatives therein must comply with national and EU legislation relating to killing of animals (euthanasia).

##### Ministerial Conditions Requirements Section 4 Processing/Handling CN 12

SRM must not be removed or exposed save where this is required for TSE testing, therefore

- The splitting of the vertebral columns is forbidden. Where a carcass is severely bloated it is permissible only to puncture the rumen abdomen of that carcass.
- Opening of the abdomen or evisceration of carcasses is forbidden save for post-mortem examinations carried out by registered veterinary surgeons.

##### Findings

Evidence of carcasses that had been eviscerated onsite was seen in one collection centre.

In one establishment, significant volumes of tripe packed in plastic bags, were stored in a large refrigerated container and there was no traceability documentation available to where it came from.

One collection centre shot animals on-site but SOPs were not available and staff had not been trained on this practice.<sup>15</sup>

## 4.2 Establishments Feeding ABP Meat to Dogs ('Meat Feeders')

The regulations allow for fox hunts and packs of hounds owners (which may include dog breeding establishments predominately establishments breeding greyhounds) to feed category 2 ABP to dogs. As part

<sup>15</sup> The effectiveness of official controls has been reviewed by DAFM and plans a significant increase in 2017 in the number of controls (inspections and audits), including unannounced visits at each knackery/collection centre.

of the audit, seven establishments feeding ABP meat to dogs were audited to assess their compliance with those aspects of APB legislation that applies to their activities.

### 4.2.1 Registration

#### Legal Requirements

##### Article 23 of Regulation 1069 of 2011

Registration of operators, establishments or plants.

1. With a view to registration, operators shall:

(a) Before commencing operations, notify the competent authority of any establishments or plants under their control which are active at any stage of the generation, transport, handling, processing, storage, placing on the market, distribution, use or disposal of animal by-products and derived products

(b) Provide the competent authority with information on:

(i) the category of animal by-products or derived products under their control;

(ii) the nature of the operations performed using animal by-products or derived products as starting material.

2. Operators shall provide the competent authority with up-to-date information on any establishments or plants under their control as referred to in point (a) of paragraph 1, including any significant change in activities such as any closure of an existing establishment or plant.

##### Ministerial Conditions Requirements of CN 24 B

Meat ABP may only be purchased for feeding by authorised persons. Each authorisation must be in date.

#### Findings

Six of the seven sites audited were registered as required. One greyhound owner feeding Category 2 ABP to dogs was not registered with DAFM.

### 4.2.2 Record keeping, labelling and purchasing stained ABP for feeding

#### Legal Requirements

##### Regulation 142/ 2011 Article 13

1. Operators may feed Category 2 material to the following animals, provided that such material comes from animals which were not killed or did not die as a result of the presence or suspected presence of a disease communicable to humans or animals, subject to compliance with the general requirements laid down in Section 1 of Chapter II of Annex VI and any other conditions that may be laid down by the competent authority;

##### Ministerial Conditions Requirements of CN 24 B

1. All meat ABP (except for fish) must be stained with a solution of a green/blue colouring agent or yellow colouring agent which is clearly visible even when the product is frozen.

2. The person feeding ABP meat should not accept improperly stained meat ABP. With the exception of poultry and fish, meat ABP for feeding must be cut into small pieces or prepared as mince at the collection centre and received as such at the time of purchase. Bones including skulls or whole limbs must not be included.

- 3 The meat ABP should be packaged and labelled. This label must include the name, address and approval number of the collection centre from which it is sourced. This label should also include the words “Category 2 For Feeding to Dogs (or Hounds)”.
- 4 All meat ABP should be stored appropriately. Storage should consider the risks posed to the greyhounds such as contamination of the meat ABP with other products. The meat ABP should be maintained suitably frozen or chilled if not fed immediately.
- 5 Measures should be taken to avoid nuisance deriving from pests or odour associated with the activities involving meat ABP on-site.
- 6 Meat ABP must be stored, secured and fed appropriately, ensuring that children or unauthorised persons and animals other than greyhounds may not access the meat ABP.
- 7 The authorised person must complete all fields in the “Intake Records Book”. Record-keeping should take place at the time of purchasing, feeding or disposing of meat and should not take place retrospectively.

### Findings

The audit team visited seven establishments feeding ABP meat to dogs and significant non-compliances were identified: <sup>16</sup>

- Large pieces of ABP were inadequately stained in one establishment
- Category 3 meat was seen in two establishments. The meat present on the day of the audit remained fully labelled with the plant identification mark still attached to the boxes which indicated that the meat was suitable for human consumption rather than being readily identifiable as Category 3 ABP
- In one establishment, the business operator stated that the Category 3 mince was bought at a greyhound track and from a local supplier
- In another establishment, the business operator informed the audit team that meat is purchased from an approved meat plant
- Bones and carcass sides/quarters were fed to greyhounds in one establishment which is not in compliance with ABP rules
- Large pieces of ABP lightly sprayed with dye were delivered in barrels in one establishment
- Unstained bovine legs and equine sides were seen stored at one establishment

In one establishment, the minced ABP was compliant with denaturing, staining and labelling requirements. Five meat feeder business operators were met by the audit team and two of the establishments maintained good records. Storage of ABP was adequate in all facilities however, there was limited evidence of pest control in place.<sup>17</sup>

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<sup>16</sup> Following an intensive consultation process involving all stakeholders, Bord na gCon and the Irish Coursing Club agreed in 2015 to carry out inspections of the premises of applicants for ABP meat feeder licences with a view to ensuring that the facilities for feeding ABP meat at these premises are fit for purpose. They have also agreed to provide assistance in identifying unlicensed meat feeders. Detailed procedures have been agreed between DAFM, Bord na gCon and the Irish Coursing Club and the new system has been developed and embedded during 2016. DAFM meets regularly with Irish Coursing Club and Bord na gCon with a view to ensuring these arrangements work well.

<sup>17</sup> See footnote. <sup>16</sup>

### 4.3 Hide Plant and Category 1 Rendering Plant

#### Legal requirements

##### EC Regulation 1069/2009

##### *Hide Plant*

The hide plant may only accept Category 3 hides as specified in the plant certificate of approval. Category 3 hides and skins are hides and skins from healthy slaughtered animals which have tested negative for BSE (Article 10 (a), (b) (iii) of EC Regulation 1069/2009) and hides and skins from fallen animals where the hides/skins did not show signs of disease communicable to humans or animals, (Article 10 (n) of EC Regulation 1069/2009).

Where a plant is authorised to supply trimmings and splittings from hides for the production of gelatine for animal consumption, only Category 3 hide and skins referred to in Article 10 (a), (b) (iii), (healthy slaughtered animal hides which have tested negative for BSE) of EC Regulation 1069/2009 may be used.

Hides/skins may only be accepted into the plant provided each consignment is accompanied by a fully completed commercial document. Operators must keep all commercial documents filed and in date order.

##### *Rendering Plant*

Only the raw materials described in Article 8 (Category 1), Article 9 (Category 2) and Article 10 (Category 3) of Regulation (EC) No 1069/2009 may be accepted into the plant to be used for processing. All product should be considered Category 1 ABP upon entry to the plant.

The operator must organise for documentary and visual checks on raw material consignments to verify that only raw material or derived product allowed in this approval and which are safe will be accepted into the plant.

All ABP material delivered to the plant must be accompanied by a completed commercial document which meets the requirements as laid down in Annex VIII Chapter III of Regulation (EU) No 142/2011, and, when required by the legislation, a health certificate.

#### Findings

To ensure batches of ABP were fully traceable, related records in a hide plant and a rendering plant were audited. The audit team examined traceability records for batches of ABP transported from intermediate plants and establishments feeding meat to dogs. In both the hide plant and the rendering plant, traceability records were available to verify the batches of ABP received.

### 4.4 Disease Communicable to Humans or Animals

#### Legal Requirement

##### Art 13(1) of Regulation (EU) No 142/2011

Only animals that did not die as a result of the presence or suspected presence of a disease communicable to humans or animals can be fed to animals.

### Findings

To implement this requirement, the licence granted by DAFM to the business operator contains a condition that *“The plant is authorised for the collection of Category 2 material, provided that it comes from animals which were not killed or did not die as a result of the presence or suspected presence of a disease communicable to humans or animals, and of Category 3 material for feeding to dogs only.”*

The businesses have not put procedures in place to verify that animals were not killed or did not die as a result of the presence or suspected presence of a disease communicable to humans or animals. In addition, DAFM has not put in place, a system of official controls to verify that this particular requirement is being complied with.<sup>18</sup>

## 5. CONCLUSIONS

ABPs are materials of animal origin that are not intended for human consumption and which should be excluded from the human food supply chain so that they will not be consumed by the public. ABP Regulations set down the rules for these products in order to prevent and minimise risks to public and animal health.

The audit team identified many examples of practices, which were non-compliant with the legal requirements and the ministerial conditions laid down by DAFM.<sup>19</sup> Fundamental deficiencies relating to the staining and labelling of products were identified. In addition, re-processing of Category 3 meats was seen in two meat feeding establishments with no controls in place.<sup>20</sup> The effectiveness of official controls applied in these establishments should be reviewed by DAFM so that the risk of ABP entering the human food chain is minimised.<sup>21</sup>

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<sup>18</sup> DAFM understands the derogation in Art 18(1) of Regulation (EC) 1069/09, as supplemented by the provision about communicable disease in Art 13(1) of Regulation (EU) 142/2011, was put in place with the intention of facilitating longstanding ABP meat-harvesting and feeding practice in Ireland and the UK in particular, while mitigating associated risk. The practice is recognised as an important economic support for the sector and in particular for the greyhound industry which is worth c€500m pa to the economy. It also helps keep down the cost to farmers of fallen animal collection. Meat is not harvested from animals culled/killed as part of any disease control/eradication programme. DAFM has commissioned a survey of pathogens that may be present in knackeries. This study is being carried out by the DAFM laboratories and by University College, Dublin. The final report will be available in 2017. It is expected that this will assist in filling a current information deficit about areas of risk and in turn, inform specific proposals to address same. These could include additional labelling requirements or alternative treatments to staining for some meat categories; or exclusion of some categories of fallen animal. Based on the results of this survey, DAFM will review the need for further controls at knackeries with the aim of minimising any risk.

<sup>19</sup> Specific non-compliances reported in individual plants are being or will be followed up by DAFM with the plants concerned. Appropriate action will be taken in accordance with EU and national ABP legislation and conditions of approval, with a view to addressing the underlying issues and preventing recurrence.

<sup>20</sup> A new Veterinary Procedural Notice (VPN) has been drawn up to enhance controls of ABPs at slaughter houses and meat establishments supervised by the Veterinary Public Health Inspection Service (VPHIS) of DAFM. Specifically, new requirements and procedures are being put in place for the VPHIS-supervised plants that wish to provide Category 3 meat to dogs and other animals specified under the derogation set out in Article 18 of the animal by-products regulation (EU Regulation 1069/2009). DAFM is of the view that the new procedures will assist greatly in ensuring that the non-compliances that were identified during the FSAI audit in relation to Category 3 meat will be minimised. DAFM will engage with veterinary staff responsible for supervising local authority slaughter houses with a view to putting similar procedures in place.

<sup>21</sup> The effectiveness of official controls has been reviewed by DAFM and plans a significant increase in 2017 in the number of controls (inspections and audits), including unannounced visits, at each knacker/collection centre. In conjunction with this, a one-day training session was carried out in November 2016 for DAFM staff who are involved in carrying out official controls at knackeries. DAFM has reviewed the legislative measures that are available for dealing with non-compliances and is satisfied that the current system allows for the application of appropriate compliance/enforcement action in the event of detection of breaches of legislation.

## ANNEX I. DESCRIPTION OF BUSINESSES AND ACTIVITIES

Knackeries are 'Intermediate Plants' because they perform 'intermediate activities' as defined in Regulation 142/2011. The removal of hides or skins is an intermediate activity.

'Collection Centres' are also defined in Regulation 142/2011: "(53). 'collection centres' means premises other than processing plants in which the animal by-products referred to in Article 18(1) of Regulation (EC) No 1069/2009 are collected with the intention to be used for feeding to the animals referred to in the same Article;" Article 18(1) introduces the derogation which permits the feeding of Cat 2 ABP to "dogs from recognised kennels of packs of hounds".

A sub-set of knackeries/intermediate plants is authorised as Collection Centres.

### *Activities*

COLL = Collecting dead animals

### *Associated Activities*

COLC = Collection Centre (for collecting meat to feed dogs, as above)

UDOG = Feeding dogs on-site

### ANNEX II. DAFM RESPONSE TO AUDIT FINDINGS

DAFM notes the content of the draft FSAI report. A number of measures have already been implemented or are in the process of being implemented, with a view to addressing the findings set out in the report. They include the following:

#### 1. Updating conditions of operation of knackeries/collection centres

DAFM has introduced updated conditions of approval (copy attached). These include, in particular, a requirement for a plant-level SOP to standardise the approach to meat harvesting, staining etc. in collection centres. The relevant condition is as follows:

*“The operator must have a detailed written standard operating procedure to adequately describe the following, at a minimum:*

- *The procedure for selecting appropriate carcasses for the harvesting of Category 2 meat for feeding to dogs;*
- *The procedure for harvesting meat from fore and hind limbs only;*
- *The procedure for denaturing/staining the meat;*
- *The procedure for labelling/storage and dispatch of the meat to end users.*

*This standard operating procedure must have been approved in advance by a DAFM authorised officer and should be modified only in consultation with a DAFM authorised officer.”*

DAFM arranged meetings with knackery operators in November 2016 with a view to raising awareness of the need for high standards at knackeries. These meetings were held in Limerick and Athlone. DAFM highlighted the new conditions and the need for a high level of compliance.

#### 2. Enhancement of official controls

The effectiveness of official controls has been reviewed by DAFM and plans a significant increase in 2017 in the number of controls (inspections and audits), including unannounced visits, at each knackery/collection centre. In conjunction with this, a one-day training session was carried out in November 2016 for DAFM staff members who are involved in carrying out official controls at knackeries.

#### 3. Enhanced arrangements for issuing meat feeding licences

Following an intensive consultation process involving all stakeholders, Bord na gCon and the Irish Coursing Club agreed in 2015, to carry out inspections of the premises of applicants for ABP meat feeder licences with a view to ensuring that the facilities for feeding ABP meat at these premises are fit for purpose. They have also agreed to provide assistance in identifying unlicensed meat feeders. Detailed procedures have been agreed between DAFM, Bord na gCon and the Irish Coursing Club and the new system has been developed and embedded during 2016. DAFM meets regularly with Irish Coursing Club and Bord na gCon with a view to ensuring these arrangements work well.

#### 4. Enhanced arrangements at abattoirs and related establishments

A new Veterinary Procedural Notice (VPN) has been drawn up to enhance controls of ABPs at slaughter houses and meat establishments supervised by the Veterinary Public Health Inspection Service (VPHIS) of DAFM. Specifically, new requirements and procedures are being put in place for the VPHIS-supervised plants that wish to provide Category 3 meat to dogs and other animals specified under the derogation set out in Article 18 of the Animal By-Products Regulation (EU Regulation 1069/2009). DAFM is of the view that the new procedures will assist greatly in ensuring that the non-compliances identified during the FSAI audit in relation to Category 3 meat, will be minimised. DAFM will engage with veterinary staff responsible for supervising local authority slaughter houses with a view to putting similar procedures in place.

#### 5. Application of compliance/enforcement action

DAFM has reviewed the legislative measures that are available for dealing with non-compliances and is satisfied that the current system allows for the application of appropriate compliance/enforcement action in the event of detection of breaches of legislation.

#### 6. Pathogen survey in knackereries

DAFM notes the finding of the FSAI report relating to the need for procedures to be in place to indicate that meat is not harvested for use in the feeding of packs of dogs from animals which were killed or died as a result of the presence or suspected presence of a disease communicable to humans or animals. It is understood the derogation in Art 18(1) of Regulation (EC) 1069/09, as supplemented by the provision about communicable disease in Art 13(1) of Regulation (EU) 142/2011, was put in place with the intention of facilitating longstanding ABP meat-harvesting and feeding practice in Ireland and the UK in particular, while mitigating associated risk. The practice is recognised as an important economic support for the sector and in particular for the greyhound industry which is worth c€500m pa to the economy. It also helps keep down the cost to farmers of fallen animal collection. Meat is not harvested from animals culled/killed as part of any disease control/eradication programme.

With this in mind, DAFM has commissioned a survey of pathogens that may be present in knackereries. This study is being carried out by the DAFM laboratories and by University College Dublin. The final report will be available in 2017. It is expected that this will assist in filling a current information deficit about areas of risk and, in turn, inform specific proposals to address same. These could include additional labelling requirements or alternative treatments to staining for some meat categories; or exclusion of some categories of fallen animal. Based on the results of this survey, DAFM will review the need for further controls at knackereries with the aim of minimising any risk.

#### 7. Website listings

With regard to the reference in the FSAI report to two DAFM website listings, the list of approved knackereries and the list of approved collection centres are being updated so that all relevant activities are recorded. It should be noted that where a plant ceases an activity, there can be a delay in notifying DAFM and as a consequence, in updating lists.

#### 8. Specific non-compliances

Specific non-compliances reported in individual plants are being or will be followed up by DAFM with the plants concerned. Appropriate action will be taken in accordance with EU and national ABP legislation and conditions of approval, with a view to addressing the underlying issues and preventing recurrence.





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