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CA response received 5 march 2012



Response of the Competent Authorities of Ireland to the recommendations of Report ref. DG(SANCO)/2011-6017-MR of an audit carried out from 17 to 28 October 2011 in order to evaluate the follow-up action taken by the competent authorities with regard to official controls related to the safety of food of animal origin, in particular meat, milk and their products

N°.	Recommendation	Action Proposed by the Competent Authority
1	To ensure that the approval of establishments is kept under review when carrying out official controls as required by Article 31.2(e) of Regulation (EC) No 882/2004.	<p><u>HSE</u> The HSE has a set of national protocols that deal with the Approvals of Food Establishments. The review process for Approved Establishments is dealt with by the Protocols re;- Regulation (EC) No 853/2004.</p> <p><u>LA</u> The relevant SOP to be amended to rectify this. This will be completed by end of Quarter 3 2012</p> <p><u>DAFM Veterinary public health inspectorate</u> VPHIS will introduce an instruction to staff to review aspects of plant approval that are not being used by FBOs and to take action where infrastructure, facilities or written procedures have become unsatisfactory. Completion date: 01/06/12</p> <p><u>DAFM Dairy Produce Inspectorate</u> Dairy Controls & Certification Division will review its procedures and amend where appropriate to ensure that the approval of establishments is kept under review when carrying out official controls as required by Article 31.2(e) of Regulation (EC) No 882/2004.</p>

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2	<p>To ensure that the risk analysis carried out to establish the frequency of official controls takes into account the FBOs past record of compliance and the reliability of own checks as required by Article 3 of Regulation (EC) No 882/2004.</p>	<p><u>HSE</u> The HSE takes into account the past record of compliance and the reliability of own checks of a FBO. This is iterated in Guidance Note 1 (Revision 2) part 2.3.4 that expressly deals with deviation from standard frequency of planned inspection. See link to Guidance note http://www.fsai.ie/guidancenotenolguidanceforthehealthserviceexecutiveontheinspectionoffoodbusinessesrevision2</p> <p><u>LA</u> The relevant SOP will be amended to rectify this. This will be completed by end of Quarter 3 2102.</p> <p><u>DAFM Dairy Produce Inspectorate</u> No action proposed by Dairy Controls & Certification Division as the risk analysis carried out to establish the frequency of official controls already takes into account the FBOs past record of compliance and the reliability of own checks as required by Article 3 of Regulation (EC) No 882/2004.</p>
3	<p>To establish documented procedures for carrying out official controls in relation to approval of establishments, in particular for collection centres and milk purchasers' facilities, as required by Article 8.1 of Regulation (EC) No 882/2004.</p>	<p><u>DAFM Dairy</u> Dairy Controls & Certification Division have already documented procedures in place but by end of quarter 1 of 2012 will clarify in the procedures what requirements are applicable for the approval of collection centres and milk purchasers' facilities</p>

4	<p>To establish documented procedures for carrying out official controls in relation to Trichinella sampling for the species susceptible to Trichinella, as required by Article 8.1 of Regulation (EC) No 882/2004 and that the methodology used for Trichinella examination is in compliance with Regulation (EC) No 2075/2005.</p>	<p><u>LA</u> The relevant SOP will be amended to rectify this. This will be completed by end of Quarter 3 2012.</p> <p><u>DAFM Veterinary public health inspectorate</u> The procedures in relation to Trichinella sampling have been updated by VPN 18/2011 issued on 22nd December 2011. See attached VPN.</p>  <p>VPN%2018_2011% 20Trichinella.pd...</p> <p>VPHIS and VPHRL DAFM are satisfied that our methods are to the satisfaction of EU Trichinella Community Reference Laboratory and await the outcome of the FVOs clarification on the issue as stated by the FVO in the cover letter to the draft report</p>
5	<p>To ensure that official controls are effective and appropriate action is taken in case of non-compliances, as required by Articles 4.2 and Article 54 of Regulation (EC) No 882/2004.</p>	<p><u>DAFM Veterinary public health inspectorate</u> VPHIS DAFM has documented procedure in place which detail the actions to be taken in the event of non-compliances. These procedures are continually under review. VPHIS have commenced adopting a more audit based approach to official controls in 2012, which are intended to increase the efficiency and effectiveness of addressing deficiencies.</p> <p><u>DAFM Dairy Produce Inspectorate</u> By end of quarter 2 of 2012 Dairy Controls & Certification Division will review and amend where appropriate its procedures to ensure that official controls are effective and appropriate action is taken in case of non-compliances, as required by Articles 4.2 and Article 54 of Regulation (EC) No 882/2004.</p>

6	<p>To ensure that the HACCP based systems in meat and milk establishments are in line with Article 5 of Regulation (EC) No 852/2004.</p>	<p><u>HSE</u> FSAI guidance note 11 Assessment of HACCP Compliance (revision 2) is used by the HSE to ensure that appropriate HACCP based systems are in place. See link to Guidance note - http://www.fsai.ie/WorkArea/DownloadAsset.aspx?id=738</p> <p><u>FSAI</u> The FSAI will deliver training on auditing food safety management systems (HACCP based procedures) to Local Authority Veterinary inspectors in Q2/Q3 2012. It is planned to provide HACCP training to the Local Authority TVI's in Q4 2012.</p> <p><u>DAFM Veterinary public health inspectorate</u> 5.1.6- 'Although the DAFM SOP 06/2008 provides for an evaluation of HACCP prerequisites, the plant CCPs and a HACCP check-list, no formal HACCP audit is mentioned'. See attached SOP</p> <p> FSMS SOP Draft 12.doc</p> <p>The new VPHIS audit based approach to official controls will target the FBO's documented procedures (based on HACCP principles) and their implementation in relevant approved food premises. Training has already been provided to all Veterinary Inspectors and roll out will commence in 2012. See attached coorespondance.</p> <p> DAFM response to Recomm 6</p> <p><u>DAFM Dairy Produce Inspectorate</u> As part of Dairy Controls & Certification Division process of continuing improvement, officers will receive planned refresher training on procedures based on HACCP principles in 2012, to ensure that the HACCP based systems in milk processing establishments are in line with Article 5 of Regulation (EC) No 852/2004.</p>
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7	To ensure that each OV undergoes training for a probationary period of at least 200 hours before starting to work independently, as required by Annex I, Section III, Chapter IV, point A4 of Regulation (EC) No 854/2004.	<p><u>FSAI</u> FSAI Audit and Compliance division will carry out an audit of Official controls as carried out by TVI's in Local Authority supervised food business operations from mid to late April 2012.</p> <p>FSAI will issue an instruction to all Local Authority County Managers advising that in the case of recruitment for OV's they must have completed the necessary 200 hours probationary training otherwise the County Council must look to provide this training. This instruction will be issued by end of Quarter 1 2012.</p> <p><u>DAFM Veterinary public health inspectorate</u> VPHIS is currently developing and commencing implementation of an updated OV mentoring programme which will ensure that newly recruited OVs will receive probationary training of at least 200 hours duration. This training will cover all areas of VPHIS activity. It is intended that this Mentoring system will be fully implemented by 31/12/12.</p>

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8	To ensure that the requirements of Chapter I, Section IX, Annex III to Regulation (EC) 853/2004 in relation to the use of raw milk from animals not complying with the requirements of points 1 to 3 of Chapter I, Section IX, Annex III to Regulation (EC) 853/2004, and, in particular, from any animals showing a positive reaction to the prophylactic test vis-à-vis TB, are met.	<u>DAFM</u> DAFM procedures to be amended (by end of quarter 2 of 2012) to include controls to ensure that the requirements of Chapter I, Section IX, Annex III to Regulation (EC) 853/2004 in relation to the use of raw milk from animals not complying with the requirements of points 1 to 3 of Chapter I, Section IX, Annex III to Regulation (EC) 853/2004, and, in particular, from any animals showing a positive reaction to the prophylactic test vis-à-vis TB, are met.
9	To ensure effective co-ordination between the different Units of the same CA responsible for official controls at establishment and holding levels in case of TB breakdowns, as required by Article 4(5) of Regulation (EC) No 882/2004.	<u>DAFM</u> A formal system of communication between the relevant Divisions of DAFM will be established (by end of quarter 1 of 2012) in the cases of TB breakdowns, as required by Article 4(5) of Regulation (EC) No 882/2004.
10	To ensure that the identification marking on cut meat and offal packaging is applied to a label fixed to the packaging or printed on the packaging in such way that is destroyed when the packaging is opened, as required by Annex II, Section I, Part C10 of Regulation (EC) No 853/2004.	<u>DAFM Veterinary public health inspectorate</u> VPHIS DAFM will issue instruction to staff and FBOs that all ‘oval marks’ must be destroyed when the packaging is opened. Completion date 1/06/12.
11	To ensure that the requirements of point 1(a), Chapter VII of Annex II to Regulation (EC) No 852/2004 for an adequate supply of potable water to be used to ensure that foodstuffs are not contaminated, are met.	<u>FSAI</u> FSAI will develop guidance for all Official Agencies in order to ensure consistency of compliance with the requirements. This will begin in Quarter 2 of 2012

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