

Audit & HACCP Based Procedures

Chapter Overview

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chapter**

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Audit

Part 1 Overview

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Section 1 – Introduction

Section Overview

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Purpose

Relevant premises

These audit arrangements apply to all meat establishments approved in Great Britain and under veterinary control.

These are:

- red meat/farmed game slaughterhouses,
 - poultry meat slaughterhouses,
 - cutting plants (including previous catering butchers)
 - wild game plants,
 - minced meat, meat preparations and mechanically separated meat plants co-located with slaughterhouses or cutting plants,
 - meat product plants co-located with slaughterhouses and cutting plants,
 - co-located cold stores.
-

Risk assessment scheme

The audit risk assessment scheme applies the requirement of (EC) 854/2004 to determine the frequency of audit using the risk criteria set out in that Regulation:

- public health risks
 - animal health risks (where appropriate)
 - animal welfare risks (where appropriate)
 - type of process carried out
 - throughput
 - FBOs record of compliance with food law.
-

Aim of OV audits

The twin aims of the OV audits of FBO procedures are to verify compliance with the legal requirements and to ensure adequate FBOs standards in relation to public health and animal welfare.

The audit sections in the audit report are based on the priorities set for the MHS that have been agreed between the MHS, FSA and Defra.

Audit findings should provide individual FBOs as well as the relevant competent authority (MHS, FSA and Defra) with information on areas for correction or improvement. For the Competent Authority, this may result in the review of the MOC and/or MIG or the development of new guidance, procedures and training.

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Purpose, Continued

'Effective' audit

An effective OV audit of FBOs obligations in respect of public health, animal health, animal welfare and animal by-products is defined as follows:

- complies with the requirements of (EC) 854/2004 to determine the frequency of audit on the basis of risk
- applies appropriate standards in determining the level of assurance that can be given to the Competent Authority (MHS, FSA and Defra) about the FBO management procedures and identification of risk
- accurately assess the FBOs level of compliance with legal requirements and identifies necessary enforcement actions
- recognises the FBOs good practices and identifies opportunities for improvement
- communicates audit findings to the FBO and the Competent Authority (MHS, FSA, Defra and Devolved Administrations as appropriate)
- is consistent in its approach.

Determination of frequency

The frequency of audit reporting is determined on a risk basis assessed, in part, on the outcome of previous audits as outlined in this chapter. The scheme has five levels of audit frequency ranging from 2 to 12 monthly intervals.

Audit frequency and ceiling level

The table below lists the minimum audit frequencies applicable to all types of food establishments.

Note: 8 month audit category is effectively a "Ceiling Level" for slaughterhouses and cutting plants.

Audit Category	Points Range	Minimum Audit Frequency
12 month	0 – 45	At least once every 12 months
8 month	50 – 90	At least once every 8 months
5 month	95 – 135	At least once every 5 months
3 month	140 – 180	At least once every 3 months
2 month	185+	At least once every 2 months

Relationship between OV Attendance and Audit Frequency

Overview The frequency of audit and the frequency of attendance will not necessarily be the same. Audit frequency represents the **minimum** number of times a year that a completed audit report will be produced.

Reference: See topic “Unscheduled Enforcement Visits” in the section “MHS Role” in this chapter for additional information.

Premises with frequent OV presence

In establishments, e.g. slaughterhouses, where OV’s are present on an ongoing basis to carry out inspection and other duties, the audit frequency represents the minimum number of times a year that an OV will produce a complete audit report.

OV’s who work in a slaughterhouse co-located with other premises may enter the other establishment regardless of the audit timetable. However, the OV should consider their reasons for entry and ensure that it is part of their official control role. Daily checks in co-located establishments are not required.

Regulation: The Food Hygiene (England) (Scotland) (Wales) Regulations 2006 (as amended), Regulation 14, 2.

Premises without frequent OV presence

In establishments without frequent OV presence, the audit frequency represents the **minimum** number of times a year that OV’s will visit and produce an audit report. The number and duration of OV visits depends on a number of factors, for example, the time required to:

- gather evidence in support of the audit (may be done in part by the MHI)
 - follow up on previous audit findings to check that corrective actions have been taken
 - undertake other official controls e.g. inspections relating to SRM
 - follow up on information received or a complaint e.g. from another OV, an EHO, or from a consumer
 - take necessary enforcement action.
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Relationship between OV Attendance and Audit Frequency, Continued

Premises with specific requirements The table below summarises the circumstances under which specific types of establishments operate under a different audit regime.

Establishment	Audit regime
New start up, conditionally approved cutting plants	<p>At cutting plants, if risks are being managed appropriately, FBO audit will not commence until full approval is granted, otherwise the OV should conduct monitoring and enforcement visits at the specific request of the VMHA/LV.</p> <p>If risks posed require a full audit prior to the next approval visit, set audit frequency at 2 months until full approval achieved or the FBO introduces adequate controls and audit may be suspended until full approval.</p> <p>At the visit where the VMHA recommends full approval, VMHA and LV to set audit frequency based on the FBO audit undertaken at the time.</p>
New start up, conditionally approved slaughterhouses and game handling establishments (GHEs)	<p>At slaughterhouses and GHEs, if risks are being managed appropriately, FBO audit will not commence until full approval is granted, otherwise the OV should take the appropriate enforcement action.</p> <p>At the visit where the VMHA recommends full approval, VMHA and LV to set audit frequency based on the FBO audit undertaken at the time</p>
Premises transferred from local authorities	<p>FBO audit will not commence until full approval is granted, unless the joint LV / VMHA veterinary risk assessment at the first approval visit identifies risks that require a full audit prior to the next approval visit. Where this is the case, set audit frequency at 2 months until full approval achieved, or the FBO introduces adequate controls and audit may be suspended until full approval. The OV should also conduct monitoring and enforcement visits at the specific request of the VMHA</p> <p>At the visit where the VMHA recommends full approval, VMHA and LV set audit frequency based on the FBO audit undertaken at the time</p>

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Relationship between OV Attendance and Audit Frequency, Continued

Premises with specific requirements, (continued)

Establishment	Audit regime
All previously licensed premises refused approval	Set audit frequency at 2 months from the date of the FSA refusal letter until court hearing (if FBO appeals). The OV must conduct monitoring and enforcement visits as determined by the risk posed.
Conditional approval at previously licensed slaughterhouses and game handling establishments	Audits are to be suspended until full approval is granted. Monitoring and appropriate enforcement should be undertaken by the OV where the FBO is not managing the risk, progressing towards compliance, or at the specific request of the VMHA. At the visit where the VMHA recommends full approval, VMHA and LV set audit frequency based on the FBO audit undertaken at the time
Conditional approval at previously licensed stand alone or co-located cutting plants	Audits are to be suspended until full approval is granted, except premises currently on a 2 month audit frequency. They will remain at this audit frequency throughout the conditional approval period. Monitoring and appropriate enforcement must be undertaken by the OV where the FBO is not managing the risk, progressing towards compliance, or at the specific request of the VMHA. At the visit where the VMHA recommends full approval, VMHA and LV set audit frequency based on the FBO audit undertaken at the time
Existing premises under new management	An initial audit must be carried out within 2 months of new management being introduced, then set subsequent audit visits according to risk assessed audit category.
Seasonal premises	Where the date of the next scheduled FBO audit falls within the closed season when the establishment is not operating the audit should be completed not later than 2 months from re-commencing operation. However, if the establishment is expected to operate for less than two months of the year at least one audit should be conducted within each 12 month period.

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Relationship between OV Attendance and Audit Frequency, Continued

Premises with specific requirements, (continued)

Establishment	Audit regime
Closed and re-opening premises (within 6 months)	Where the date of the next scheduled FBO audit falls within the period when the establishment is not operating, the audit should be completed not later than 2 months from re-commencing operations, to ensure that at least 1 audit is conducted within each 12 month period.

Section 2 – Legislation

Section Overview

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Requirement for Audit

General requirements for official controls

It is a principle of (EC) 854/2004 that official controls will verify the FBOs compliance with (EC) 852/2004, (EC) 853/2004 and (EC) 1774/2002.

Part of that verification process is the audit of good hygiene practices and HACCP-based procedures, i.e. the FBOs food safety management system.

In addition to the audit of good hygiene practice, the OV must verify the FBOs continuous compliance with their own procedures for all aspects of animal by-product handling (including SRM control), animal identification, health and welfare of animals, etc.

In addition to the audit of HACCP-based procedures the OV must check that the operator's procedures guarantee, to the extent possible, that meat is free from patho-physiological abnormalities or changes, faecal or other contamination and SRM (subject to Community rules).

Regulation: (EC) 854/2004, Article 4.

Food fraud

The recommendation of the Food Fraud Task Report 2007 is that auditors and other officials visiting food premises should bear in mind the possibility of fraudulent activities.

Reference: [Food Fraud Task Report 2007](#)

GHP audit

Audits of good hygiene practices shall verify that FBOs apply procedures continuously and properly, concerning at least:

- checks on food chain information
 - the design and maintenance of premises and equipment
 - pre-operational, operational and post-operational hygiene
 - personal hygiene
 - training in hygiene and in work procedures
 - pest control
 - water quality
 - temperature control
 - controls on food entering and leaving the establishment, and
 - any accompanying documentation.
-

Requirement for Audit, Continued

HACCP audit Audits of HACCP-based procedures are to verify that FBOs are applying procedures continuously and properly. The OV must determine whether the procedures guarantee, to the extent possible, that products of animal origin:

- comply with microbiological criteria laid down under EU legislation
- comply with EU legislation on residues, contaminants and prohibited substances, and
- do not contain physical hazards, such as foreign bodies.

Reference: (EC) 853/2004, Section II, Annex II.

When a FBO uses procedures set out in guides to the application of HACCP principles rather than establishing its own specific procedures, the audit shall cover the correct use of these guides.

Reference: (EC) 852/2004, Article 5.

Section 3 - FBO Responsibility

Section Overview

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Compliance with the Legislation

FBO standards

The FBO is required to comply with the requirements of (EC) 852/2004 and (EC) 853/2004. These are the standards against which the OV will assess the FBO performance at audit.

Food safety management procedures must be implemented and must be sufficient to achieve the objectives of the Regulations.

Reference: [MIG](#), Part 1 – FBO Obligations.

Role of the Meat Industry Guide

The Meat Industry Guide (MIG) contains an interpretation of the EU Regulations and extensive, detailed guidance on how the FBO may achieve effective compliance with the Legislative requirements.

Justification of procedures

The FBO is not obliged to follow the guidance in the MIG and may choose to achieve compliance with the Regulations by alternative means.

The FBO must be able to provide justification for the procedures put in place to manage food safety and hygiene, especially if these differ from the MIG.

Access, records and assistance

The FBO is required to offer all assistance needed to ensure that official controls carried out by the competent authority can be performed effectively, and in particular to:

- give access to all buildings, premises, installations or other infrastructures, and
- make available any documentation and records required under the Regulations or considered necessary for judging the situation.

Regulation: (EC) 854/2004, Article 4 and The Food Hygiene (England, Scotland and Wales) Regulations 2006 (as amended).

HACCP Based Systems

Obligation to implement

The FBO, considering the nature and size of the business, has a duty to implement a permanent procedure based on the 7 HACCP principles of:

- identifying any hazards that must be prevented, eliminated or reduced to acceptable levels
- identifying the CCPs / control points required by regulations at the step or steps at which control is essential to prevent or eliminate a hazard or to reduce it to acceptable levels
- establishing critical limits / legal limits at CCPs / control points required by regulations which separate acceptability from unacceptability for the prevention, elimination or reduction of identified hazards
- establishing and implementing effective monitoring procedures at CCPs / control points required by regulations
- establishing corrective actions when monitoring indicates that a CCP/ control point required by regulation is not under control
- establishing procedures, which shall be carried out regularly, to verify that the measures outlined above are working effectively, and
- establishing documents and records commensurate with the nature and size of the food business to demonstrate the effective application of the measures outlined above.

When any modification is made in the product, process, or any step, food business operators shall review the procedure and make the necessary changes to it.

The FBO must also provide the competent authority with evidence of their compliance and ensure that any documents describing the procedures are up-to-date at all times.

Regulation: (EC) 852/2004 Article 5 and EU guidance document on the implementation of procedures based on HACCP principles, and on the facilitation of the implementation of the HACCP principles in certain food businesses.

Reference: See [MIG, Part 3](#), Chapter 1 – Application of HACCP based procedures and Part 2 of this chapter – HACCP based procedures.

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HACCP Based Systems, Continued

HACCP and pre-requisites

HACCP systems are not a replacement for other food hygiene requirements, but a part of a package of food hygiene measures that must ensure safe food. It must be borne in mind that "prerequisite" food hygiene requirements must be in place prior to establishing HACCP procedures, including in particular:

- requirements for infrastructure and equipment
- requirements for raw materials
- the safe handling of food (including packaging and transport)
- food waste handling
- pest control procedures
- sanitation procedures (cleaning and disinfection)
- water quality
- maintenance of the cold chain
- the health of staff
- personal hygiene
- training.

These requirements are designed to control hazards in a general way and they are clearly prescribed in Community law. They may be supplemented with guides to good practices established by the different food sectors.

Reference: EU guidance document on the implementation of procedures based on HACCP principles, [EUROPA - Food Safety - Biological Safety of Food - Legislation on Food Hygiene](#) and on the facilitation of the implementation of the HACCP principles in certain food businesses and MIG, Part 2, Chapters 1 to 15.

Note: Other requirements of Community law, such as traceability, the withdrawal of food and the duty of informing the competent authorities should, although not covered under the food hygiene rules, also be considered as prerequisite requirements.

Reference: (EC) 178/2002, Article 18 &19.

Section 4 - MHS Role

Section Overview

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Responsibilities

Who is the auditor? The type of premises may determine who conducts the audit, according to the following table.

Establishment	Auditor
Slaughterhouses and Game Handling Establishments	OV
Co-located meat plants (cutting plant, meat preparations plant, meat products plant)	OV
Stand alone meat plant (cutting plant, meat preparations plant, meat products plant) (No VC removal)	OV or LV*
Stand alone cutting plant (cutting plant, meat preparations plant, meat products plant) (VC removal)	OV or LV*
Establishments approved as a Processing Plant (meat products, rendered animal fats and greaves, treated stomach, bladder & intestines and ready to eat meats) and processing ready to eat meats	OV** or LV*
*Lead Veterinarian **OVs auditing these premises will need to have passed the MHS 'Assessment of Meat Products (Ready to Eat) OV Competency'	

Note: Audits should be carried out by the plant OV as part of normal duties. Where a Contractor considers it necessary to use an alternative or additional OV or requires additional time; this can only be done in exceptional circumstances and by prior agreement with the Business Manager (BM). Novice OVs (NOV) cannot undertake audit work but could carry out evidence gathering in support of the audit.

Audit tasks The following table identifies the different tasks and responsibility for completion.

Task	Responsibility
Arrange audit visit date with the FBO or their representative	Auditor
Confirm audit visit date in writing copying the letter to the Delivery Planning Unit (DPU)	Auditor
Audit preparation gathering information on FBOs food safety management systems	Auditor
Complete 'Risk Factor Data'	Auditor
Gather information on food safety management systems	MHI / OV/ NOV

Continued on next page

Responsibilities, Continued

Audit tasks, (continued)

Task	Responsibility
Carry out audit visit including the discussion of audit findings and possible corrective actions with the FBO or their representative	Auditor
Compile audit report	Auditor
Undertake a check of the audit report for establishments approved as a Processing Plant (meat products, rendered animal fats and greaves, treated stomach, bladder & intestines and ready to eat meats) and processing ready to eat meats.	LV
Distribute completed audit report to FBO	DPU

Auditor's code of ethics

The following four principles are the standards of conduct that are expected from OV's carrying out FBO audits:

1. Integrity

Auditors should demonstrate integrity in all aspects of their work. The relationship with other OV's and with FBOs and MHI's should be one of honesty and fairness. This establishes an environment of trust which provides the basis for all activities carried out by the auditing OV.

2. Objectivity

Auditors should display appropriate professional objectivity when providing their opinions, assessments and recommendations. The OV auditor should not be unduly influenced by the views of others or by personal interest.

3. Competency

The OV auditor should not carry out audits if they feel they do not have the base auditor competency or if they lack technical competency in the area being assessed. During the OV probationary period NOV's should focus on acquiring those auditing competencies.

4. Confidentiality

Auditors should safeguard the information they obtain while carrying out their duties. There should not be any unauthorised disclosure of information unless there is a legal or professional requirement to do so.

Continued on next page

Responsibilities, Continued

Auditor duties

The auditor is responsible for:

- advising the FBO on compliance with legal requirements,
 - undertaking audit activities in line with this instruction,
 - preparing a report for the FBO and DPU at the prescribed frequency, and
 - determining an audit outcome.
-

Auditor exclusions

The auditor should not:

- assume accountability for FBO compliance
 - take over tasks that are for the FBO to perform
 - act as a quality assurance manager
 - act as an advocate between industry and the MHS
 - write company procedures or HACCP plans, although advice may be given.
-

LV duties

The LV is responsible for undertaking checks to ensure appropriate scores in Section 1.2 and evidence explaining the decision for the scores awarded is detailed in the audit report (AUD 9.3), for establishments approved as a Processing Plant Processing Plant (meat products, rendered animal fats and greaves, treated stomach, bladder & intestines and ready to eat meats) and processing ready to eat meats.

Reference: See Section 5 'Risk Assessment'

MHI duties

MHI's working regularly in an establishment must ensure that they are familiar with the procedures put in place by the FBO. This will necessitate that they know the contents of any written procedures relevant to the processes for which they have an inspection role.

Note: The auditor must ensure that MHI's working under their responsibility maintain a current understanding of the FBOs procedures.

Continued on next page

Responsibilities, Continued

**Delivery
Planning Unit
(DPU)
administration
duties**

DPU will:

- monitor the scheduling of the audit visits in accordance with the minimum audit frequency determined by the audit category,
 - monitor the timely production of audit reports,
 - distribute the completed report to the FBO,
 - maintain audit records, and
 - issue appeal forms to FBOs, as requested.
-

Newly Approved Establishments

Introductory meeting

Before first auditing an establishment, or if the FBO responsible for the establishment has changed since the last audit, the auditor should hold an introductory meeting with the FBO to discuss the following points:

- an overview of the Regulations, any changes since previous audits and the FBOs responsibilities
 - introduction to the MHS Manual for Official Controls and amendments
 - outline the MHS enforcement policy and possible outcome of the audit
 - role of the "Guide to The Food Hygiene and Other Regulations for the Meat Industry" (Meat Industry Guide)
 - audit role of the auditor, powers of entry (when necessary)
 - risk assessment (including validation of risk data) and audit frequency arrangements
 - audit process and timetable
 - reporting arrangements, including publication of the audit category
-

Audit Schedule

Arranging visits

The auditor will contact the FBO one month in advance of the audit being due (two weeks notice is acceptable but not best practice) to agree a date for the audit visit.

The scheduling of the audit visits will be monitored by DPU/BM in order to ensure that audit targets and frequencies are met.

The agreed date of the audit visit must be confirmed in writing by the auditor to the FBO. This letter will provide the FBO with prior warning of an audit; outlining the scope of the audit and the access and information that will be required. Regulation (EC) 882/2004, Article 3, Paragraph 2

Reference: See MHS Intranet – Documents - Operations Directorate - FBO Audits for template letter.

Notification of the audit will allow the FBO to make themselves, or their relevant members of their management team available. In addition, it allows the FBO to have any necessary documentation available for audit.

Auditor / Contractor tasks

The following tasks are the responsibility of the auditor:

- arrange the audit visit with the FBO
 - complete the audit within the calendar month of the designated audit frequency
 - complete the report and return it to DPU within 10 working days of the audit visit. DPU will then arrange for logging and distribution, including to the FBO and BM.
-

Target for subsequent audit completion

Subsequent audit visits will be within the month determined by the last audit category.

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Audit Schedule, Continued

**Alternative
arrangements**

Where the audit date has been scheduled with the FBO and the FBO wishes to cancel/rearrange, the auditor/contractor shall inform the BM of the agreed audit date and inform DPU of the re-scheduling to assist with the tracking.

Where an auditor/contractor anticipates that they are unable to complete the audit visit within the required timescale, the auditor or contractor must inform the BM without delay, so that alternative arrangements can be made.

Audit Protocol

Audit notification

The FBO must be given prior warning of an audit; this should be done in writing, outlining the scope of the audit and the access and information that will be required.
Regulation (EC) 882/2004, Article 3, Paragraph 2.

Reference: See MHS Intranet – Documents - Operations Directorate - FBO Audits for template letter.

Notification of the audit will allow the FBO to make themselves, or relevant members of their management team, available. It also allows the FBO to have any necessary documentation available for audit.

Note: Where there are areas of concern regarding the FBOs level of compliance unannounced visits may take place during which evidence may also be gathered for the subsequent audit. These may be arranged through the BM.

Reference: See topic “Unscheduled Enforcement Visits” in this section for additional information.

Collecting evidence as to the compliance of the FBO

In slaughterhouses: MHS staff are present everyday the plant operates. As part of day to day business they should record objective evidence as to the level of compliance by the FBO with both his own procedures and with legislative requirements.

In cutting plants: MHS staff will normally only be present to conduct the audit so objective evidence will only be collected during the audit.

Both the OV and MHI have an important role to play in identifying and recording non-compliances. Objective evidence of non-compliance issues may be recorded:

- on the relevant operational form
- in the daybook
- in the enforcement programme.

Note: ‘weak’ or ‘poor’ FBO controls should be acted on immediately.

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Audit Protocol, Continued

Assessment of operational records

Prior to the audit, the auditor must review operational records, including hygiene, welfare, animal by products and enforcement forms, for the period since the last audit and use this information when assessing the effectiveness of the FBOs food safety management procedures and HACCP based system, taking account of corrective actions.

The auditor should consider documentary evidence, previous audit reports and enforcement for the preceding 10 months when assessing confidence in management.

Reference: See subtopic "FBO Compliance History" in Section 5 for additional information.

The opening meeting

Start each audit with an opening meeting with the FBO (or appropriate representative) and outline the:

- reason for the audit,
 - scope of the audit,
 - review of the Corrective Action Report (CAR) from the last audit,
 - anticipated length of the audit and the plan,
 - information and access that will be required,
 - purpose of the closing meeting, and
 - publication of audit categories.
-

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Audit Protocol, Continued

When carrying out the audit

During the audit, the auditor:

- completes the Risk Assessment Data to reflect current circumstances
- collects and records objective evidence of the FBOs compliance with legislative requirements for food safety management procedures based on HACCP principles, including animal by-product and where appropriate, SRM procedures

Note: In slaughterhouses some of this information will be gathered on a daily basis by MHI's/OV's.

- inspects the establishment ('reality checks') to observe whether the FBOs procedures in practice reflect the policies and procedures as documented
- assesses the FBOs procedures using the MHS Operational Record, in particular:
 - monitoring activities and related records
 - corrective actions and related records
- determines overall outcomes as 'good', 'adequate', 'weak' or 'poor'.

Serious issues identified during audit

If an issue of serious public health, animal health or welfare arises during an audit (e.g. considered 'poor'), the auditor should:

- inform the FBO and the BM immediately
- take any necessary enforcement action
- consider curtailing the current audit.

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Audit Protocol, Continued

Audit notes

It is important that audit notes are taken during the audit as they constitute an essential element to support the OV audit findings and justify the audit assessments.

Audit notes should be kept in a page numbered notebook and each page must...

- have the audit number which comprises the four digit approval number, site type and audit date (month/year), e.g. xxxx-SH-mm/yy
- contain contemporaneous, detailed and legible notes which are cross-referenced to the aide memoir reference of the AUD 9/3 form
- be dated and signed by the auditor

Audit notes do not need to be submitted with the audit report but they should be retained and made available to a new auditor when a different auditor is going to be conducting the next audit.

Audit notes must be retained for a minimum of 2 years (more than 2 years if there are ongoing outstanding enforcement actions).

FBO involvement in Audit

The auditor should expect to be accompanied by the FBO (or a nominated representative) throughout the audit.

The closing meeting

The audit must be concluded with a closing meeting with the FBO (or appropriate representative) which will:

- summarise the audit findings (positive and negative),
- outline any non-compliances,
- discuss the corrective action required, including any proposed timescales and possible enforcement action,
- discuss the confidence in FBOs food management systems score, and
- give an indication of the expected future audit category
- give details of report procedure,
- give details of publication of the audit categories, and
- outline subsequent action and right of appeal.

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Audit Protocol, Continued

The closing meeting,
(continued)

The closing meeting provides an opportunity for the FBO to respond to audit findings, to discuss his proposed actions and to provide any further supporting evidence if he disagrees with any audit findings.

It may be appropriate to allow the FBO a short period of time following completion of the audit to provide any documentation not available at the time or to demonstrate immediate action taken to correct deficits identified.

Auditor written report

The written report (form AUD 9/3) must be compiled from the audit findings and should not be materially different from the findings presented verbally during the closing meeting.

The report must be sent to DPU within 10 working days of the audit visit.

Reference: See the topic "Completing the Audit Report" in this section for additional information.

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Audit Protocol, Continued

Submission of written report

The following table details the process which should be followed after completion of the Auditor written report.

Step	Action
1	The Auditor sends written report (AUD 9/3) to DPU within 10 working days of the audit visit. This should be sent by email to: Delivery.Team@mhs.gov.uk
2	DPU records submission of the written report, to ensure contractor compliance with target time scale
3	DPU forwards the AUD 9/3 electronically to the LV (copied to BM) for review, and if appropriate, sign off of the audit report.
4	LV reviews the report within 5 working days
5	If the LV has any issues relating to the report, these are to be referred to the auditor (copied to DPU) for clarification/correction.
6	On completion of the review the LV signs off the report and returns it to DPU within 5 working days. <u>Note:</u> If DPU do not hear from the LV within this timeframe, it will be assumed that there are no issues. However, early responses confirming that there are no issues enable DPU to send the report to the FBO without delay. Likewise, if there are issues requiring clarification, notification of this fact to DPU will ensure that reports are not issued ahead of those issues being resolved.
7	DPU records completion and issues report to FBO.

Auditor's feedback to the MHS team

In premises where MHS is present, every member of the MHS team can contribute by gathering information on the FBOs food safety management systems.

The OV is also responsible for making all members of the team aware of the audit results, including non compliances, the corrective action report and timescales.

This can be done making available a copy of the audit report and/or by arranging a team meeting.

Completing the Audit Report

Format and purpose

The Audit Report may be assessed by the BM/LV to ensure consistency of reporting and will also be available to Internal (VAU) and external (FSA or FVO) Auditors.

During subsequent audits, the auditor should refer to the previous Audit Report to direct priorities during audit in a risk based manner, especially areas assessed as 'weak' or 'poor' that will always have to be reassessed in the next audit.

The audit report (AUD 9/3) contains several sections as outlined in the table below:

Audit Report Sections	Contains
Establishment, Audit, Auditor and FBO Details	<ul style="list-style-type: none"> • Establishment details: <ul style="list-style-type: none"> • Approval number • Name and address of the establishment • Type of establishment • Approval status • Approval matches plant activities • Audit details: <ul style="list-style-type: none"> • Audit number • Time spent during audit preparation, audit visit and report writing • Previous audit date and category • Number of follow up enforcement visits since previous audit • Auditor details <ul style="list-style-type: none"> • Name, telephone and e-mail of the auditor conducting the audit • FBO (or their representative) details <ul style="list-style-type: none"> • Name and position • Name of others attending the audit
Summary	<ul style="list-style-type: none"> • Corrective actions completed since the last audit <ul style="list-style-type: none"> • Include the corrective action reference from the last audit and details of the achieved compliance outcome • Audit findings <ul style="list-style-type: none"> • Include positive and negative findings

Continued on next page

Completing the Audit Report, Continued

Audit Report Sections	Contains
Part 1 Risk Factors	1.1 Potential hazards: <ul style="list-style-type: none"> • Microbiological hazards • Chemical hazards • Physical hazards 1.2 Type of process carried out 1.3 Vulnerable consumers potentially at risk 1.4 Throughout
Part 2 FBO Actions	2.1 Animal health risks of public health significance: <ul style="list-style-type: none"> • FBO controls on incoming animals including Food Chain Information (where available) • Other FBO controls to minimise potential spread of animal diseases 2.2 Animal welfare: <ul style="list-style-type: none"> • Lairage conditions and animal handling • Slaughter procedures including training of operatives • Ritual slaughter • FBO action on welfare issues 2.3 Hygienic production including <ul style="list-style-type: none"> • Slaughter and dressing • TSE controls • Cutting/processing of meat/co products • Transport/ re wrapping/ re packaging/ storage of product • Further handling of ABP/ waste 2.4 Environmental Hygiene: <ul style="list-style-type: none"> • Structure • Water supply • Maintenance • Cleaning • Pest control • Staff training/ instructions and supervision • Staff health and hygiene • A detailed summary of compliance/ non-compliance • Evidence to support auditor's assessments

Continued on next page

Completing the Audit Report, Continued

Audit Report Sections	Contains
<p>Part 2 FBO Actions, cont</p>	<p>2.5 Confidence in FBOs food safety management systems to control hazards</p> <ul style="list-style-type: none"> • Application of HACCP based procedures, including microbiological verification, if appropriate • HACCP training <p>For the above criteria the auditor must provide:</p> <ul style="list-style-type: none"> • An assessment ('good', 'adequate', 'weak' or 'poor')
<p>Corrective Action Report (CAR)</p>	<p>Corrective actions required including an agreed or suggested timescale (target completion date) and the level of priority:</p> <ul style="list-style-type: none"> • High priority (H) relates to non conformities where immediate and specific risks must be managed by the FBO: <ul style="list-style-type: none"> • In the area of animal welfare this would relate to immediate and specific risk of unnecessary pain and/or unnecessary distress • In the area of public health it will relate to immediate and specific risk in relation to hazards causing foodborne illness • In the area of animal health it will relate to poor FBO controls to deal with animal health controls. • Medium priority (M) relates to non conformities that require attention as they may affect the achievement of FBO processes or food safety management systems. These include areas where: <ul style="list-style-type: none"> • If action is not taken, over time a more serious level of risk might arise • Where an actual risk would occur only if there was a cumulative failure in this non conformity and others

Continued on next page

Completing the Audit Report, Continued

<p>Corrective Action Report (CAR), (continued)</p>	<ul style="list-style-type: none">• Low priority (L) captures those non conformities that are minor weaknesses in the FBO procedures or food safety management systems that are unlikely to affect achievement of the objectives of the FBO systems or processes but which the OV wish to bring to the attention of the FBO to enhance their procedures and controls. <p>Note: It is important to remember that the fact that non conformities are lower priority does not mean they are unimportant, it is a statement of the priority with which they are dealt with by the FBO and the level of risk attached to those non conformities.</p>
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When to complete the Audit Report

The Audit Report may be completed during the audit, on site, or at a later date from notes taken during the audit. The written Audit Report should be compiled from the evidence gathered during the audit period, and must reflect the information and opinion given to the FBO during the closing meeting.

Supporting evidence is to be recorded in the Audit Report.

Verification of risk factors - Part 1

During the opening meeting, the auditor will verify with the FBO or their representative the risk assessment data in Part 1 based on the activities carried out since the last audit report. Any changes since the last audit will be recorded in the audit report part 1 evidence box.

Continued on next page

Completing the Audit Report, Continued

Verification of compliance - Part 2

Use the relevant legislation, the Meat Industry Guide and the Manual for Official Controls to verify FBO compliance with the requirements of EU and national legislation. For example:

- Requirements of the Animal By-Products (Identification) Regulations 1995 (as amended) (identification and storage of ABP)
- Requirements of Regulation (EC) 999/2001 (removal, identification and storage of SRM)
- Requirements of Regulation (EC) 1774/2002 (collection and disposal of ABP & SRM)

The Meat Industry Guide identifies the individual requirements of the legislation. This will assist both the auditor and FBO in referencing the industry guidance.

Note: The use of the guidance in the Meat Industry Guide by the FBO is voluntary and the FBO systems/ procedures may be different to the ones described in the Meat Industry Guide but they may be valid to achieve compliance with the legislation.

Note: The parts of the report requiring completion will depend on the nature of the food business i.e. slaughter / cutting and the species handled.

Audit Report Sections

Each section of the 'FBO actions' of the audit report (Part 2) contains a set of statements that reflect outcomes in the MHS priorities agreed by MHS, FSA and Defra.

The purpose of the statements is to improve a structure for the audit report. The audit section lists are not exhaustive and OVs may consider other areas that require auditing.

Any areas assessed as 'weak' or 'poor' in previous audits always have to be assessed during the next audit.

Use of objective evidence

As the formal record of the audit findings, the audit report must reflect objective evidence to support the overall findings of the audit and the results given to the FBO during the closing meeting of the audit visit.

Continued on next page

Completing the Audit Report, Continued

Use of positive language

The OV should use positive language during the closing meeting and in the audit report.

This will help to promote constructive communication of audit findings between the OV and the FBO, better participation and resolution of non-compliances through joint identification of action and opportunities for improvement, which is the main aim of the audit.

Publication of FBOs audit report

The Freedom of Information Act 2000 gave individuals a general right to information held by public authorities (subject to certain exemptions) and to have this information communicated to them. The Environmental Information Regulations 2004 also provides a right of public access to a range of environmental information held by public authorities.

Important note: Audit reports have been disclosed in response to requests made under the above legislation (except for commercial details and a small amount of other information).

It is therefore important that reports are written with the possibility of publication in mind [subject to further consultation all audit reports may published electronically once finished].

Audit Assessment

**Compliance
 audit and
 Systems
 based audit**

An effective audit of FBO controls will require the use of both “compliance audit” and “systems based” audit techniques, they are described below:

Audit technique	Description
Compliance approach	<p>This is a review and examination of FBO records and activities to assess compliance with legislative requirements and the FBOs established policies and operational procedures.</p> <p>Much of the audit work to support compliance assessment will take place in the operational environment. In establishments where there is frequent OV presence this assessment work will be ongoing as part of the MHS teams normal duties between the production of audit reports.</p>
Systems based approach	<p>The auditor should seek to establish that the FBOs controls are fit for purpose and that the FBO has effective systems and processes in place to implement them on a continuous basis. Weaknesses and strengths in the FBOs control system should be recorded.</p> <p>Much of the audit work to support the systems assessment is likely to take place outside the operational environment.</p>

**Recording
 compliance**

Each part of the audit report requires the auditor to gather evidence regarding the level of compliance with the stated outcomes and record it as ‘good’, ‘adequate’, ‘weak’ or ‘poor’.

**Further
 information
 provided by
 the FBO**

The FBO may provide additional evidence following discussion at the closing meeting. Provided this evidence is received by the auditor within 5 working days of the audit, it may be taken into consideration.

Enforcement

Contra- vention identified during audit visits

On identification of a non-compliance:

- give verbal advice at the time of the audit, and
- provide a summary of these issues in the audit report document and the Corrective Action Report.

Where the matter is considered serious, verbal advice must be supported in writing, following the hierarchy of enforcement principles.

This record must be kept on the plant file for the auditor to refer to on their next visit.

Reference: See Chapter 7 "Enforcement" for additional information.

Additional monitoring

In slaughterhouses, where the OV is present everyday, they may have to spend additional time to follow up any non compliance.

In establishments other than slaughterhouses, if the OV identifies a non conformity, a risk assessment as detailed in Chapter 7 will be carried out in consultation with the LV and the BM to establish if a follow-up visit is required:

- When the identified risk is low, the OV will verify compliance at the next scheduled visit, or
- when the risk is high or medium, the OV should indicate in the CAR that a re-visit will be taking place (generally unannounced) to verify compliance.

Note: The OV must notify the LV and BM of any proposed re-visit to the plant prior to it taking place.

Continued on next page

Enforcement, Continued

Unscheduled visits

An unannounced enforcement visit may take place when there is reason to believe that an FBO is not meeting regulatory requirements. This could arise from a food complaint, an audit outcome or ongoing enforcement.

Before undertaking such an enforcement visit the OV or auditor must discuss with an LV, the circumstances of the case, the actions they intend to undertake, the relevant timescale and the intended outcomes.

The LV will then assess, based on the evidence provided, the need for such a visit relative to the risk and whether it is reasonable and proportionate and advise the OV or auditor accordingly.

The agreed actions must then be notified to the relevant BM by the OV or auditor before proceeding with the enforcement visit.

When it is identified that enforcement or enforcement visits result in the MHS incurring additional costs this time may be chargeable to the FBO. BMs will authorise any additional charges to be levied prior to the enforcement visit.

Enforcement visits must take place as necessary and may be unannounced.

Regulation: (EC) 882/2004 Article 3, Paragraph 2.

SINP code

When the FBO fails to comply, which leads to the MHS having to carry out additional monitoring and enforcements actions as an additional cost to the MHS, the time spent by the OV in those activities shall be charged as an Additional Charge to the FBO as SINP?

However, regardless of the 'additional cost' or 'inefficiency' the levying of additional charges should be considered reasonable.

Section 5 - Risk Assessment

Section Overview

In this section

The table below lists the topics in this section.

Topic	See Page
Audit Report	5-2
Risk Factors - Points Awarded	5-4
FBO Actions - Audit Risk Assessment	5-9
Confidence in FBOs Food Management Systems to Control Hazards	5-12
Review and Right of Appeal	5-17

Audit Report

Report Form See [MHS Intranet - AUD Forms](#) for copy of the audit report form (AUD 9/3).

Summary of findings The report contains an area to summarise the audit findings. The summary of findings shall include positive findings (good practice), negative findings (non-compliances) and a brief description of any variations from the previous audit enabling the FBO and other interested parties to review the audit without needing to read the full detail contained within the report.

Corrective Action Report (CAR) At the end of the audit report there is a Corrective Action Report (CAR). The CAR contains 2 sections as described in the following table.

The CAR enables the OV to clearly inform the FBO of areas identified as requiring corrective action and timescales for completion. Timescales for completion have to be discussed, and when possible, agreed with the FBO at the closing meeting.

Once the FBO receives the report with the CAR, the FBO is responsible for completing the corrective action taken and the date completed, sign the form and return it to the OV or present it at the next audit.

The CAR also allows MHS managers to identify issues that may require follow up visits.

Section completed by...	Contains...
Auditing OV	<ul style="list-style-type: none"> ● Corrective Action <u>Reference</u> ● Corresponding section of report ● Target completion date ● Corrective action requiring a follow-up visit
FBO or Representative	<ul style="list-style-type: none"> ● Corrective action taken ● Date completed

Continued on next page

Audit Report, Continued

Completion of corrective actions

During the next audit the OV has to verify whether the FBO has taken corrective action and those have been completed.

Parts of the Audit Report

The audit report contains two parts that have to be assessed and scored to obtain a final score that determines the audit frequency.

Part	Score
Part 1 – Risk Factors	
1.1 Potential Hazards	
1.2 Type of Process	
1.3 Vulnerable Consumers	
1.4 Throughput	
Part 1 – Risk Factors Total Score	

Part 2 – Food Business Operator Actions	
2.1 Animal Health Risks of Public Health Significance	
2.2 Animal Welfare	
2.3 Hygienic Production	
2.4 Environmental Hygiene	
2.5 Confidence in FBOs Food Management Systems to Control Hazards (including HACCP)	
Part 2 – FBO Actions Total Score	

Audit Risk Assessment Final Score	Score
Part 1 – Risk Factors Total Score	
Part 2 – FBOs Actions Total Score	
Final Score	

Risk Factors – Points Awarded

Entering of Risk Factors

The auditor must enter the risk factors at the audit based on the activities carried out by the FBO during the last audit period, rather than the establishment's approval; e.g. an establishment may be approved to slaughter 3 species but if only one species has been slaughtered during the last audit period, no extra points should be scored.

Potential Hazards

The risk scores allocated in this section are pre-set, dependent upon the likely hazards in the establishment based on the plant activities carried out during the last audit period, as indicated in the following table.

Note: Due to the potential hazards most fresh meat plants will be awarded a total of at least 45 points and will therefore not be eligible to be in Audit Category 12 months.

Award	Guidance on assessment
30	Potential for microbiological hazards i.e. contamination, cross-contamination, growth and/or survival of pathogenic or spoilage bacteria, viruses, parasites, and fungi, in or on the product.
5	Only frozen products handled.

Award	Guidance on assessment
10	Potential for chemical hazards i.e. contamination of meat from residues of veterinary products/pesticides/feed additives, as well as from packaging and/or careless use of chemicals (e.g. cleaning products, disinfectants, lubricants).
5	Some potential (e.g. animals/meat from assured sources, therefore potential contamination is from packaging/production environment only).
0	Only ready-wrapped products handled.

Award	Guidance on assessment
5	Potential for physical hazards i.e. contamination of meat by foreign bodies.
0	Only ready-wrapped products handled.

Continued on next page

Risk Factors – Points Awarded, Continued

Type of process carried out

The table below indicates the risk scores allocated to premises dependant upon the processes carried out by the FBO during the last audit period.

If any process is carried out on a specific day of the week note this down in the evidence section so it is taken into consideration at future audits.

Note: Activity types (a)-(c) must be assessed independently even if they occur in combined premises. Other combinations must be assessed together if handled in one establishment site.

Handling of RTE products

When activity (d) is recorded at +25 points, **the OV must make specific comments** (in the evidence box at part 2.5 of the AUD 9/3) on the FBO controls of RTE meat products.

Activity (d) might not apply to premises that only buy in and store pre-packed ready-to-eat products. OV's must ensure that there is no further processing and that the product is stored correctly posing no risks.

When the OV considers that there is no risk they must complete the Section 1.2 of AUD 9/3 and in the evidence box at part 2.5, explaining why it was decided not to add the +25 points, describing exactly what happens to the product and explaining that, on that basis, the auditor considers that it seems reasonable not to add this as a further risk. This decision may be challenged and will need documentary back up.

To aid OV's with the identification of RTE products further guidance has been provided in the portal under the Frequently Asked Questions section

<http://intranet/C9/C14/Frequently%20Asked%20Questions/default.aspx>

Contract OVs auditing this premises will need to have passed the MHS "Assessment of Meat Products (Ready to Eat) OV Competency"

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Risk Factors – Points Awarded, Continued

Risk Scores allocated

Activity	Guidance on assessment
a) Slaughter	+0 if only one group of species slaughtered +5 for each other additional red meat grouped species handled, <u>and</u> +5 if handling only sheep/goat SRM or +10 if handling only cattle SRM or cattle and sheep/goat SRM
b) Dressing of Game	+0 if handling either mammals or birds +10 if handling both mammals and birds
c) Cutting of meat	+0 if only either red, white or game meat is cut +5 if cutting more than one type of meat (red/white/game), <u>and</u> +5 if handling SRM
d) Handling ready-to-eat products	+25
e) Production of Meat Product	+10
f) Production of Meat Preparations	+5
g) Production of MSM	+5
h) Production of Minced meat	+15
i) Re-wrapping/ Re-packaging	+5
j) Cold storage	+0

Species

For the allocation of the score, the different species have to be grouped as described in the following table.

If only one group of species is slaughtered (e.g. bovine) no points has to be scored. For each additional group slaughtered 5 points have to be added (e.g. if bovine, ovine and porcine are slaughtered, add 10 points).

Group	Species included
Bovine	Cattle, calves, buffalo and bison
Ovine and/or caprine	Sheep and goats
Porcine	Finished pigs (fattening), cull pigs (adult boar/sow) and farmed boar
Others	Horses, deer and others

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Risk Factors – Points Awarded, Continued

Vulnerable Consumers potentially at risk

Most establishments supplying raw meat have the potential to supply vulnerable consumers either directly or indirectly.

Situations where such supply is unlikely include suppliers of game or where the supply is to approved meat products manufacturers.

The lack of sale to vulnerable consumers has to be proved by the FBO to the auditor.

Award	Guidance on assessment
0	Meat supplied (directly or indirectly) is not likely to be served to groups of 20+ vulnerable people (e.g. hospital, day care centre, nursing home) and/or it will be further processed in approved meat product manufacturing establishments.
20	There is uncertainty about the population who may be supplied with the meat and the nature of the process it may receive before it reaches the consumer.

Throughput

This relates to number of consumers potentially at risk.

Note: The thresholds for slaughterhouses and cutting plants are as used for HACCP implementation where 'large' covered about 75% of UK production and 25% of UK plants.

Continued on next page

Risk Factors – Points Awarded, Continued

Award	Guidance on assessment
5	Very small (i.e. equivalent to previous 'low throughput' slaughterhouses and cutting plants), likely to market locally.
15	Small/Medium throughput not in other two categories (default for meat processors until size known).
20	Average weekly throughput above 500 livestock units or 200,000 birds in a slaughterhouse / over 150 metric tonnes cut meat, likely to market nationally.

FBO Actions - Audit Risk Assessment

FBO compliance history

The history of compliance relates to the deficiencies identified against legislative requirements for the FBOs own procedures and requiring OV intervention during the audit interval or previous available audits.

Note: FBO initiating corrective actions where the FBO has identified a breakdown in controls is a sign of a healthy control system.

During the audit, the auditor will record evidence of the FBO compliance history, which will result in a risk score under each category based on the following criteria:

Assessment	Guidance on assessment of compliance history
Good	<p><u>Active compliance</u> with statutory requirements – no action necessary.</p> <ul style="list-style-type: none"> • procedures effective • HACCP based principles applied satisfactorily
Adequate	<p><u>Occasional</u> lapses in FBO compliance with statutory requirements in the audit period where there were no significant implications for public health or animal welfare and following OV intervention:</p> <ul style="list-style-type: none"> • FBO procedures required minor corrections • HACCP based principles generally applied, only minor corrections needed.
Weak	<p><u>Frequent</u> intervention by OV in the audit period to gain FBO compliance with statutory requirements where:</p> <ul style="list-style-type: none"> • FBO procedures were inadequate • HACCP based principles were inadequately applied • action by FBO was necessary to avoid formal enforcement action <p><u>and</u> the above gave rise to significant implications for public health and/or animal welfare.</p>

Continued on next page

FBO Actions - Audit Risk Assessment, Continued

Assessment	Guidance on assessment of compliance history
Poor	<p>Regular intervention by OV in the audit period to gain FBO compliance with many statutory requirements where:</p> <ul style="list-style-type: none"> • FBO procedures seriously flawed or non existent • HACCP based principles not applied • immediate enforcement action is necessary. <p>and cumulatively the above gave rise to the potential for serious risk to public health and/or animal welfare.</p> <p>Or there was a breakdown in specific FBO controls that actually caused:</p> <ul style="list-style-type: none"> • immediate serious risk to public health, or • an animal to sustain avoidable excitement, pain or suffering

Applicable areas

The above criteria will be applied to the following audit categories:

- animal health risks of public health significance
- animal welfare
- hygienic production
- environmental hygiene.

Animal health risks of public health significance

The assessment will reflect the outcome of audits on FBO practices including:

- FBO controls on incoming animals including Food Chain Information (where available)
- Other FBO controls to minimise potential spread of animal diseases

Scores allocated for each assessment are as follows:

Note: This category will only apply in slaughter and wild game processing establishments.

Assessment	Award
Good	0
Adequate	5
Weak	15
Poor	25

Continued on next page

FBO Actions - Audit Risk Assessment, Continued

Animal welfare

FBO compliance with requirements for animal transport, lairaging, handling, stunning, killing and bleeding, including ritual slaughter.

Note: This category will only apply to slaughter establishments.

Assessment	Award
Good	0
Adequate	5
Weak	10
Poor	15

Hygienic production

FBO compliance with regulations for dressing, cutting, processing, handling (wrapping, packaging, storage and transport) practices and procedures, TSE controls, ABP and temperature control.

Assessment	Award
Good	0
Adequate	5
Weak	15
Poor	25

Environmental hygiene

FBO compliance with requirements for: structure, water supply, maintenance, cleaning, pest control, staff training/instructions and staff health and hygiene.

Assessment	Award
Good	0
Adequate	5
Weak	15
Poor	25

Confidence in FBOs Food Management Systems to Control Hazards

Allocation of 'Confidence in FBOs Food Management Systems'

The score allocated will reflect the outcome of audits of FBO controls.

The main component for the OV assessment of this section of the audit report is the continuous and correct application of HACCP based procedures by the FBO.

Assessment of Confidence in FBOs Food Management Systems.

To determine when the next audit visit/report will be, the audit category of the premises has to be established. The auditor must make an assessment of "Confidence in FBOs Food Management Systems".

In order to make this assessment, the auditor must take account of :

- evidence of best practices implemented by the FBO
- non-compliances raised during the audit period
- the effectiveness of FBO actions to correct these non-compliances
- FBO response to any enforcement taken during the audit period
- the FBO response during the closing meeting to issues raised during the audit.

The proposed Confidence in FBOs Food Management Systems score should be discussed with the FBO during the closing meeting, and confirmed with objective evidence in the written report.

Note: The items listed are areas that the auditor should consider when making the judgement, not a detailed or exhaustive list of requirements to be met.

Continued on next page

Confidence in FBOs Food Management Systems to Control Hazards, Continued

Assessment	Guidance on assessment
<p>Good: Award 0</p>	<p>FBOs demonstration of competency regarding hygiene and food safety gives high confidence that hazards will be controlled on an ongoing basis. e.g.:</p> <ul style="list-style-type: none"> • compliant in all audited areas or only few OV interventions required • HACCP plans kept under review • HACCP based principles embedded into staff routines, particularly with regard to monitoring and corrective action • fully documented policies and procedures are in place to ensure continuing good hygiene practices, particularly with regard to staff training, cleaning and maintenance procedures • accredited to quality assurance schemes and subject to third party audits. Act immediately on complaints • actively seek advice • rarely obtain poor microbiological test results • active compliance with statutory requirements – none or few OV actions necessary.
<p>Adequate: Award 5</p>	<p>Management attitude to hygiene and food safety gives reasonable confidence that hazards will be controlled on an ongoing basis. The auditor has evidence that:</p> <ul style="list-style-type: none"> • the FBO is complying with regulatory requirements in most audited areas • where there have been areas out of control, the FBOs corrective actions have been, or are being, applied appropriately and effectively • FBO procedures require minor corrections <p>Occasional lapses in FBO compliance with statutory requirements in the audit period where there were no significant implications of public health and/or animal welfare.</p>

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Confidence in FBOs Food Management Systems to Control Hazards, Continued

Assessment	Guidance on assessment
Weak: Award 15	<p>Attitude to hygiene and food safety gives little confidence that hazards will be controlled on an ongoing basis. The auditor has evidence of:</p> <ul style="list-style-type: none">• FBO procedures inadequate in many audited areas• numerous inadequate FBO procedures that collectively indicate a trend towards loss of control• deficiencies are identified by the FBO but not effectively managed• HACCP based principles inadequately applied• Frequent intervention by OV in the audit period to gain FBO compliance with statutory requirements where there were significant implications for public health and/or animal welfare.

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Confidence in FBOs Food Management Systems to Control Hazards, Continued

Assessment	Guidance on assessment
<p>Poor:</p> <p>Award 30</p>	<p>Management attitude to hygiene and food safety gives minimal confidence that hazards will be controlled on an ongoing basis. The auditor has evidence of one or more of the following:</p> <ul style="list-style-type: none"> • unsatisfactory application of HACCP based principles, particularly with regard to monitoring and corrective action • few policies and procedures in place to ensure continuing good hygiene practices, particularly with regard to staff training, cleaning and maintenance procedures • unwillingness to act on complaints, previous advice and enforcement • failure to act on poor microbiological test results • Inadequate FBO procedures in many audited areas and are reasonably likely to lead to exposure of humans or animals to an unacceptable level of hazard (e.g. poor or unacceptable FBO controls that require immediate OV intervention) • required records are absent, incomplete or have been altered, to a degree that means the auditor has no confidence in the system being audited • FBOs monitoring procedures repeatedly fail to identify serious deficiencies • a specific breakdown of FBO controls that actually caused: <ul style="list-style-type: none"> • immediate serious risk to public health • an animal to sustain avoidable excitement, pain or suffering <p>Frequent intervention by OV in the audit period to gain FBO compliance with many statutory requirements where there were potential serious risks for public health and/or animal welfare.</p>

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Confidence in FBOs Food Management Systems to Control Hazards, Continued

Assessment of HACCP based system

Whilst assessing the effectiveness of the FBOs implementation of HACCP principles, the auditor should have regard to the guidance contained in:

- the HACCP chapter of the MIG
- the Meat Plant HACCP Manual
- the EU guidance document on the implementation of procedures based on HACCP principles, and on the facilitation of the implementation of the HACCP principles in certain food businesses.

The audit should validate the accuracy and fitness for purpose of the HACCP based procedures plan and verify effective implementation.

Reference: Further guidance is included in the [MIG HACCP chapter](#).

Review and Right of Appeal

FBO right to seek review

If an FBO is dissatisfied with the outcome of discussions with the OV after the review meeting, or the audit report once received from DPU, the FBO has the right of appeal in line with the following procedures:

Step	Action
Try to resolve informally	All efforts should be made to resolve any misunderstanding or dissatisfaction informally on a local basis
Direct FBO to DPU to request an audit appeal form	If a FBO, or their representative, still wishes to appeal an audit report they should be directed to the DPU audit co-ordinator to request the audit appeal form "Request for a review of the Audit of the FBOs Food Safety Management System"
FBO submits formal appeal, with supporting evidence	The FBO, or their representative, should complete their part of the form, stating which sections of the audit report the FBO is appealing against and giving objective evidence to support the claim that the auditor's assessment is incorrect. Any supporting evidence should be copied and sent with the form to the audit co-ordinator within 28 calendar days of receiving the initial audit report from DPU.
Investigating Officer (IO) appointed	On receipt of the completed appeals form DPU will inform the relevant BM and provide them with a copy of the appeal including any supporting evidence. The BM is then responsible for appointing an Investigating Officer (IO)
IO conducts an investigation	The IO conducts an investigation and completes a report before the last date for completion (stated in part 1 of the appeal form).
Investigation outcome	On conclusion IO distributes IO report and audit report to the FBO, OV & Contractor and DPU (cc BM and LV). The IO is responsible for discussing the investigation findings with the auditing OV and the FBO (or their representative) regardless of whether the audit report resulted in an amended or the score was upheld. The IOs decision is final but if FBO is dissatisfied by the means in which the appeal was undertaken by the MHS (not the outcome of the appeal) the MHS Complaints Procedure is available.

Examples of Completed Risk Assessments

Cutting Plants

	1 White Meat	2. Red Meat (no SRM)	3. Red Meat (SRM handled)	4. White & Red (no SRM)	5. White & Red (SRM handled)
A. Risk Factors					
Type of hazard	45	45	45	45	45
Process type					
Species	0	0	0	5	5
SRM	0	0	5	0	5
Vulnerable Consumers	0/20	0/20	0/20	0/20	0/20
Throughput					
V Small +5	50/ 70	50/ 70	55/ 75	55/ 75	60/ 80
Small/Med +15	60/ 80	60/ 80	65/ 85	65/ 85	70/ 90
Large 20	65/ 85	65/ 85	70/ 90	70/ 90	75/ 95

B. FBOs Actions	Excellent	Acceptable	Poor	Unacceptable
Hygienic prod.	0	5	15	25
Env. hygiene	0	5	15	25
Confidence in Management Systems	0	5	15	30
Total	0	15	45	80

<i>Sample outcomes</i>	Points Ranges for cutting plant examples in Column 1 (min) & Column 5 (max) above			
<i>A+B Total</i>	Excellent	Acceptable	Poor	Unacceptable
Very Small	50/ 80 (8 m Cat)	65/ 95	95/ 125	130/ 160 (5 m/ 3 m Cat)
Small/Medium	60/ 90 (8 m Cat)	75/ 105	105/ 135	140/ 170 (3 m Cat)
Large	65/ 95 (8 m/ 5 m Cat)	80/ 110	110/ 140	145/ 175 (3 m Cat)

Continued on next page

Examples of Completed Risk Assessments

Slaughterhouses

	1. Pigs or Poultry only	2. Sheep only	3. Cattle only	4. Pigs & Sheep	5. Pigs & Cattle	6. Sheep & Cattle	7. 3 red meat species
A. Risk Factors							
Type of hazard	45	45	45	45	45	45	45
Process type							
Species	0	0	0	5	5	5	10
SRM	0	5	10	5	10	10	10
Vulnerable Consumers	0/20	0/20	0/20	0/20	0/20	0/20	0/20
Throughput							
V Small +5	50/ 70	55/ 75	60/ 80	60/ 80	65/ 85	65/ 85	70/ 90
Small/Medium +15	60/ 80	65/ 85	70/ 90	70/ 90	75/ 95	75/ 95	80/ 100
Large +20	65/ 85	70/ 90	75/ 95	75/ 95	80/ 100	80/100	85/ 105

B. FBOs Actions	Excellent	Acceptable	Poor	Unacceptable
Animal health	0	5	15	25
Animal welfare	0	5	10	15
Hygienic prod.	0	5	15	25
Env. hygiene	0	5	15	25
Confidence in Management Systems	0	5	15	30
Total	0	25	65	120

Sample outcomes	Points Ranges for slaughterhouse examples in Column 1 (min) & Column 7 (max) above			
<i>A+B Total</i>	Excellent	Acceptable	Poor	Unacceptable
Very Small	50/ 90 (8 m Cat)	75/ 115	120/ 160	170/ 210 (3 m/ 2 m Cat)
Small/ Medium	60/ 100 (8 m/5 m Cat)	85/ 125	130/ 170	180/ 220 (3 m/ 2 m Cat)
Large	65/ 105 (8 m/ 5 m Cat)	90/ 130	135/ 175	185/ 225 (2 m Cat)

Co-located Cold Store Aide Memoire

Areas for consideration When auditing FBO food safety management systems in co-located cold stores, the checklist below details the areas which are to be considered:

Assessment Audit Report/checklist

	Yes/No	Comments
Structure, Layout & Equipment		
Effective refrigeration equipment constructed and maintained to avoid contamination of, or contact with, meat?		
Appropriate temperature recording equipment installed?		
Records retained for an appropriate period?		
Practices ensure that long periods of temperature rise in cold rooms are avoided?		
Adequate facilities/systems to prevent accumulation of ice/snow (frozen condensation)?		
Doors seals tight?		
Doors closed when not in use?		
Use of strip curtains?		
Other systems to prevent ingress of warm air?		
Storage		
All meat kept off the floor?		
Packaged meat – stored in a strongly constructed racking system?		
Packaging sufficient to protect meat during storage?		
Exposed carcass meat – overhead rails, metal frames and hooks? Product protected from sources of contamination e.g. wooden pallets?		
Sufficient number of chambers for the operations being carried out in the premises?		

	Yes/No	Comments
Storage (continued)		
Meat maintained at, or below, required temperatures throughout period of storage?		
Cold stores approved to handle only fully wrapped or packaged meat- <ul style="list-style-type: none"> • adequate reception and despatch facilities to protect packaged meat? • Wrapping and packaging sufficiently robust to prevent exposure of the meat? 		
Cold stores approved to handle unwrapped or wrapped meat not packaged- <ul style="list-style-type: none"> • Sealed docking bays or alternative in place to provide equivalent level of protection? • Suitable overhead rail system for red meat carcasses, sides and wholesale cuts? • Store rooms and transit corridors finished to exposed meat standards? • Adequate separation between different exposed meats? 		
Traceability		
Good traceability of incoming meat, is it accompanied by appropriate documentation?		
Adequate management and recording systems to enable product to be identified and associated with all relevant documentation?		
Does occupier ensure goods despatched from premises are accompanied by appropriate documentation?		

	Yes/No	Comments
Additional issues (if applicable)		
Application of Good Hygiene Practice together with the implementation of HACCP based procedures which includes the cold store operation?		
Health marking, wrapping and packaging requirements observed where resealing, re-lidding or re-boxing? <ul style="list-style-type: none"> • All operations involving interference with packaging carried out with knowledge of OV? • Done hygienically? 		
All meat despatched checked for temperature & marking? <ul style="list-style-type: none"> • Exposed meat checked for contamination? • Packaged meat – integrity of packaging checked? • Loaded hygienically onto suitable transport vehicle? – action taken & recorded where not? 		
Incoming meat inspected for contamination, damage to packaging, compliance with temperature, marking & documentation requirements? – action taken & recorded where not?		
Adequate system for returned product?		
Adequate system for disposal of rejected product?		
Imported beef checked? <ul style="list-style-type: none"> • IMP 8/2 completed? • IMP 8/1 completed when required? 		
Imported meat (EU/Third country imports) <ul style="list-style-type: none"> • Consignments accompanied by appropriate documentation/ CVED? • Unsatisfactory consignments, follow up action? 		
'In House' Cold storage of carcasses and offal with a localised <i>Cyticercus Bovis</i> infestation – is cold treatment as indicated in Chapter 2.4 Section 4?		
'In House' Cold treatment of pig meat as an alternative to <i>Trichinella</i> testing – is cold treatment as indicated in Chapter 2.4 Section 4?		

Part 2 - HACCP Based Procedures

Part 2 Overview

In this part The table below lists the sections in this Part.

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Section 1 - Introduction

Section Overview

**In this
section**

The table below lists the topics in this section.

Topic	See Page
Legislation	1-2
Characteristics of HACCP Based Procedures	1-5

Legislation

HACCP legislative framework

The following table summaries the different pieces of legislation that cover FBO and OV responsibilities in relation to HACCP based procedures.

Regulation		Issue	Who is responsible?	Other documents
Reg (EC) 852/2004	Ch II, Article 5	Put in place, implement and maintain a permanent procedure based on HACCP principles	FBO	<ul style="list-style-type: none"> • Commission Guidance • MIG • Food Safety Management Diary for Meat Producers
	Annex II, Ch XII	Train staff responsible for the development and maintenance of HACCP based procedures in the application of HACCP principles	FBO	<ul style="list-style-type: none"> • Commission Guidance • MIG
Reg (EC) 853/2004	Annex II, Section II	List of HACCP based objectives for incoming animals accepted for slaughter	FBO	<ul style="list-style-type: none"> • Commission Guidance • MIG
Reg (EC) 854/2004	Ch II, Article 4	Audit and verification that FBOs apply HACCP principles continuously and properly	OV	<ul style="list-style-type: none"> • MOC • MIG • Food Safety Management Diary for Meat Producers

(EC) 852/2004 evidence

The FBO shall provide the OV with evidence of their compliance with the HACCP legal requirements, taking into account the nature and size of the business, and ensure that any documents describing the procedures are up to date at all times.

Continued on next page

Legislation, Continued

(EC)
852/2004
evidence,
(continued)

The instructions in this chapter reflect the minimum requirements expected to consider an FBO plan of HACCP-based procedures adequate and in compliance with the Regulations.

Regulation: (EC) 852/2004, Chapter II, Article 5.

(EC)
854/2004
OV
verification
of HACCP
based
procedures

The OV is required to conduct audits to verify that food business operators apply HACCP based procedures continuously and properly to make sure, in particular, that:

- procedures guarantee that the requirements for incoming animals are met
- meat complies with the microbiological criteria
- meat complies with the community legislation on residues, contaminants and prohibited substances
- meat does not contain physical hazards, such as foreign bodies

Regulation: (EC) 854/2004, Chapter II, Article 4, 5.

Key
reference
documents

The Meat Industry Guide (MIG) contains information for FBOs on the application of HACCP based principles to comply with the legal requirements as well as advice. It takes account of the Commission's guidance on flexibility and includes generic HACCP plan material. **It should be read by OV's advising on or auditing the application of HACCP principles.**

The European Commission has produced a guidance document for the implementation of procedures based on HACCP principles and to facilitate the implementation of HACCP principles in certain food businesses.

Reference: MOC, Volume 2 Legislation for additional information.

Continued on next page

Legislation, Continued

**Key
reference
documents,**
(continued)

[The Food Safety Management Diary for Meat Producers](#) (the 'Diary') has been produced by the FSA for smaller operators. The Diary is specifically designed to facilitate FBOs to keep records relating to the hygienic operation of their businesses. It also includes draft documentation on prerequisites and HACCP.

The use of the Diary by FBOs is voluntary.

Reference: See the topic "Principle 7 – Documentation" in Section 2 of this chapter for additional information.

Characteristics of HACCP Based Procedures

Purpose HACCP principles are a tool for FBOs to use to control hazards that may occur in food.

HACCP is a set of 7 principles used to assess hazards and establish control systems that focus on prevention of problems rather than relying solely on end-product testing.

**Implement-
ation
requirements**

The successful application of HACCP based procedures requires the following:

- the FBO must already have implemented the hygiene controls that are required by legislation (prerequisites/good hygiene practice)
 - requires the full commitment of management and the involvement of the work force.
-

**'Traditional'
HACCP vs.
HACCP based
procedures**

'Traditional', 'classic' or 'technical' HACCP is not the same as 'HACCP based procedures'.

Traditional HACCP evolved from spacecraft manufacture to guarantee the safety of astronauts' food. It remains appropriate for industrial production of processed foodstuffs involving for example, sterilisation or pasteurisation steps.

It is however acknowledged in (EC) 852/2004 and particularly in the Commission's guidance on HACCP that such a technical approach may not be appropriate for all types and sizes of food businesses. In the case of meat plants, for example, it can be sufficient to apply the principles in a more flexible way following guides to practice.

Continued on next page

Characteristics of HACCP Based Procedures, Continued

**'Flexibility':
Nature and
size of the
operations**

Flexibility regarding the application of HACCP principles may be applied, taking into account:

- the nature of the operations
- the size of the business

Flexibility taking into account...	Comments
Nature of the operations	<p>In businesses handling food with no significant food safety hazards (e.g. greengrocers) a hazard analysis confirming that is the case can be sufficient.</p> <p>In businesses handling many foods (e.g. restaurants) a simplified approach using a diary can be sufficient.</p> <p>In businesses involving simple processing (e.g. slaughterhouses and cutting plants) a generic plan with a diary for record keeping can be sufficient as long as they are adapted to reflect company conditions.</p> <p>In food manufacturing businesses, particularly with procedures that will eliminate hazards (e.g. canning plants) full technical HACCP is more appropriate.</p> <p>OV auditors should consider whether the HACCP based procedures are appropriate for the type of business.</p>

Continued on next page

Characteristics of HACCP Based Procedures, Continued

'Flexibility': Nature and size of the operations, (continued)

Flexibility taking into account...	Comments
Size of the business / documentation	<p>The size of business and resources available will have a bearing on the complexity of the HACCP based system; however a simple, easily managed system can achieve the safe production of food as well as a more complex system.</p> <p>A traditional HACCP system relies heavily on recording that all the procedures are being followed correctly, probably by the Quality Control, Quality Assurance or HACCP team.</p> <p>Small and medium sized businesses rarely require the same level of documentation. They may choose to record when things go wrong, called 'exception reporting'.</p> <p><u>Reference:</u> See the topic "Principle 7 – Documentation" in Section 2 of this chapter for additional information.</p> <p>OV auditors should note that there is no value in FBO documentation being disproportionate to the level of risk and the recording of HACCP based monitoring procedures being a burden to small-medium businesses.</p>

Continued on next page

Characteristics of HACCP Based Procedures, Continued

Flexible application of HACCP principles

FBO application of HACCP principles should meet the following criteria:

- identify the main hazards associated with the type of product produced and the operations carried out
 - *flexibility – hazards - generic descriptions of hazards may be sufficient*
- identify those Critical Control Points (CCPs)/ Control Points (CPs) necessary to control those hazards. The FBO may choose to have in the plan only CPs which are legal requirements
 - *flexibility – CCPs - generic guidance may include pre-determined CCPs in the preparation, manufacturing and processing of food*
- establish critical (or legal) limits against which to monitor the effectiveness of control measures at CCPs/ CPs
 - *flexibility - critical limits - it is not always necessary to fix a numerical value, especially where monitoring procedures are based on visual observation (e.g. the faecal contamination of carcasses in a slaughterhouse)*
- monitor CCPs/ CPs
 - *flexibility - monitoring - may be a simple procedure, e.g. a visual observation to monitor whether the correct de-hiding procedure is being applied during slaughter where this part of the slaughter process has been identified as a CCP for preventing carcass contamination*
- take the necessary corrective actions based on the results of the monitoring activities
- record the observations and corrective actions taken. The requirement of retaining documents needs to be flexible in order to avoid undue burdens for small/medium businesses.
 - *flexibility - recording - in the case of visual monitoring procedures it can be acceptable to record results only when there is a problem and the corrective action that has been taken i.e. 'exception reporting'. A diary can be a suitable method of record keeping*

Continued on next page

Characteristics of HACCP Based Procedures, Continued

Flexible application of HACCP principles,
(continued)

- verify the HACCP-based procedures
 - *flexibility - verification - checking all aspects of the HACCP plan can be spread throughout the year so that all aspects are verified at least once a year to meet the requirement for 'regular' verification.*

Reference: See the MIG for additional information.

Review of HACCP based procedures

The HACCP procedures should be reviewed and necessary changes made by the FBO when any modification is made in the product, process or any step.

OV role

OV's, through auditing, need to determine the level of FBO compliance with HACCP principles always taking into consideration the possibility of implementing simplified HACCP based procedures particularly in small/medium sized businesses.

Section 2 – Common Issues for HACCP Auditing

Section Overview

In this section

The table below lists the topics in this section.

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Introduction

This section covers common issues for OV's to consider when auditing a food safety management system based on HACCP principles in compliance with the regulation.

Training

Staff responsible for HACCP based procedures

Those responsible for the development and maintenance of HACCP-based procedures have received adequate training in the application of HACCP principles.

Regulation: (EC) 852/2004, Annex II, Chapter XII, 2.

Training – common issues

The following table contains examples of common issues that the OV could find when auditing HACCP based procedures and guidance on how the OV should make the assessment to determine FBO compliance:

Common Issues	OV advice/guidance
No member of staff with formal training	<p>Formal training is not a legal requirement; the FBO however, should show that they have received 'supervision, instruction and/or training'.</p> <p>This can be achieved in a number of ways including (list not exhaustive):</p> <ul style="list-style-type: none"> ● one to one instruction ● day courses ● in house courses ● distance learning courses <p>These may or may not be accredited courses; however there should be evidence of training. Examples include: certificates, completed test papers, questionnaires, personal assessment papers, individual training records showing instruction or training received etc.</p> <p><u>Reference:</u> See the MIG HACCP Chapter and the Commission Guidance document (MOC, Volume 2 Legislation) for additional information.</p>

Continued on next page

Training, Continued

Training – common issues, (continued)

Common Issues	OV advice/guidance
The FBO believes they do not require any training at all as the HACCP based system has been written by an external advisor / consultant	<p>If external advisors / consultants are used, they should do so as part of a HACCP team, providing instruction and guidance rather than working independently and writing the system for the FBO. It may mean that the FBO is unable to answer questions or make amendments without reference to the adviser. This raises the question of whether the staff can be maintaining their HACCP-based procedures and has adequate training to do so.</p> <p>Instruction given by the external advisor/consultant to the FBO should be recorded on individual training records.</p> <p>Primary responsibility for food safety rests with the FBO, so ownership of the food safety system should be that of the FBO</p> <p><u>Regulation:</u> (EC) 852/2004, Chapter I, Article 1, 1(a)</p>

Implementation and Maintaining of HACCP Based Procedures

**HACCP
implement-
ation and
maintaining**

FBOs shall put in place, implement and maintain a permanent procedure or procedures based on the HACCP principles taking into account the nature and size of the business.

Regulation: (EC) 852/2004, Recital 15 and Article 5, 1 and the EC Commission Guidance document on implementation of procedure based on the HACCP principles (MOC, Volume 2, Legislation).

Principle 1 – Hazard Analysis

Hazard identification

The FBO is responsible for identifying any significant hazards that must be prevented, eliminated or reduced to acceptable levels.

Regulation: (EC) 852/2004 Article 5, 2(a).

Hazard identification – common issues

The following table contains examples of common issues that the OV could find when auditing HACCP based procedures and guidance on how the OV should make the assessment to determine FBO compliance:

Common Issues	OV advice/guidance
No HACCP team	<p>Large meat plants may have a multi-disciplinary HACCP team (CODEX HACCP guideline) which may be a requirement of Quality Assurance schemes rather than Legislation.</p> <p>Due to the resources available and often an undefined management structure a HACCP team in medium sized meat plants may consist of just two individuals, in a small meat plant, food safety may be the responsibility of just one individual.</p>

Continued on next page

Principle 1 – Hazard Analysis, Continued

Hazard identification – common issues, (continued)

Common Issues	OV advice/guidance
Insufficient HACCP plans	<p>In some cases the FBO may have completed a HACCP study on some but not all products.</p> <p>The OV when auditing should consider all the foods which the FBO may be processing (not necessarily on the day of the audit) and ensure that these are covered by the HACCP based system(s).</p> <p>It is necessary for the FBO to produce one or more documented plans of HACCP-based procedures for each different process carried out (unless due to the generic nature of the processes they may be grouped together).</p> <p>Examples of processes which will normally require a separate plan include:</p> <ul style="list-style-type: none"> • slaughter of different species • harvesting / cutting / packing / storing / delivering offal • receiving / cutting / packing / storing / delivering raw meat • sausage / burger manufacture • mincing meat including wrapping and packaging • receiving / storing / handling / slicing / wrapping high risk foods such as cooked meats • cooking a food • the curing of meat • meat preparations/added value products (e.g. flavour glazes)

Continued on next page

Principle 1 – Hazard Analysis, Continued

Hazard identification – common issues, (continued)

Common Issues	OV advice/guidance
The product description does not include technical information.	<p>Flexibility as to what is included should relate to the technical nature of the production process.</p> <p>For example, a meat plant producing a meat preparation and/or meat product is likely to require a greater amount of data such as microbiological criteria, moisture content etc. than a meat plant that simply cuts and packs a raw product.</p> <p>Large meat plants who have qualified technical teams/advisors may have the necessary skills to write a very detailed and validated technical description of the process; this may not be the case in small-medium businesses with fewer resources.</p>
Flow diagram does not show all steps in a process	<p>A flow diagram (CODEX HACCP guideline) used in a traditional HACCP system will describe all inputs into the food business (such as packaging, ingredients etc.), the different stages of process, how different foods are stored, etc.</p> <p>Generic systems based on HACCP principles may use a 'simplified flow diagram, this is an identification (rather than description) of each process step. Certain process steps may be grouped together when the risks are the same e.g. removing bones from a carcass and cutting the boneless meat into cubes, although two different procedures the hazards will be the same, therefore the process step may be written and simplified as follows:</p> <ul style="list-style-type: none"> • remove bone and prepare meat. <p><u>Note:</u> It is essential that flow diagrams accurately reflect the whole process (i.e. are validated), so that the remaining HACCP principles are correctly considered and described.</p>

Continued on next page

Principle 1 – Hazard Analysis, Continued

Hazard identification – common issues, (continued)

Common Issues	OV advice/guidance
<p>Hazards identified do not specify individual contaminants such as salmonella, rust, chemicals, peanuts etc.</p>	<p>A technical HACCP study completed by a multi-disciplinary team will be based on extensive research to ensure that all potential hazards, biological, physical, chemical and allergenic are identified e.g. the effect of competition from spoilage bacteria on the survival of food-borne pathogens.</p> <p>This level of detail is unlikely to be achieved by small-medium businesses with limited resources, who may address individual hazards by groups, e.g.</p> <p><u>Biological contamination:</u> The naming of each type of pathogenic bacteria that may be a contamination / cross-contamination hazard would be appropriate for larger plants but not for businesses following a generic plan.</p> <p>At the chilling step a generic hazard will be 'Growth of bacteria due to inadequate temperature control'. It is unnecessary for the FBO to have an in-depth understanding of microbiology.</p> <p>It is sufficient that the plan recognises the dangers of poor temperature control in relationship to bacterial growth.</p> <p>Importantly, FBOs should recognise the need to minimise the level of micro-organisms at each stage of the supply chain as there is a risk of cross contamination of ready-to-eat products by raw meat before it is itself cooked.</p>

Continued on next page

Principle 1 – Hazard Analysis, Continued

Hazard identification – common issues, (continued)

Common Issues	OV advice/guidance
<p>Hazards identified do not specify individual hazards such as salmonella, rust, chemicals, peanuts etc. (continued)</p>	<p><u>Physical contamination:</u> Individual hazards such as parts from machinery, contamination from building fabric etc. may be combined and identified as 'contamination due to foreign objects'.</p> <p><u>Chemical contamination:</u> The plan may not identify a significant chemical hazard. Cleaning chemical hazards should be controlled by the application of hygiene controls, such as cleaning procedures (adhering to a Cleaning Schedules) and a list of chemical used (Cleaning Record).</p> <p>In respect of allergenic reactions, few people display allergic reactions to meat, so in raw meat slaughter/processing it is unlikely to be a significant hazard, however this risk would need to be considered when processing a meat preparation or product, which may contain relevant products such as Soya, egg, sesame</p> <p><u>Reference:</u> See MIG Part One Ch 6 for additional information.</p> <p>OV's should note the above differences applying flexibility.</p>

Continued on next page

Principle 1 – Hazard Analysis, Continued

Hazard identification – common issues, (continued)

Common Issues	OV advice/guidance
Inaccurate Control Measures identified	<p>'Control measures' are necessary to control significant hazards from contaminating a food, e.g. the chilling of meat down to a desired temperature, the implementation of maintenance procedures, etc.</p> <p>The plan of HACCP-based procedures may not distinguish control measures from monitoring procedures and may include visual inspections / observations as control measures.</p> <p>Visual inspection should be regarded as a monitoring procedure, however, although not technically correct, the inclusion of monitoring as a control measure does not have an adverse effect on the safety of food.</p>

Principle 2 – Determine the Critical Control Points (CCPs)/Control Points (CPs)

CCP/ CP identification

Identifying the Critical Control Points (CCPs) (or Control Points (CPs)) at the step or steps at which control is essential to prevent or eliminate a hazard or reduce it to acceptable levels.

Regulation: (EC) 852/2004 Article 5, 2(b).

Difference between CCP and CP

In the processing of raw meat it may not be possible to prevent or eliminate hazards and reduction steps may not be measurable in the same way as, for example, when food is canned.

Therefore, FBOs may consider that for their product and/or operations there are no 'traditional' CCPs. There are process steps, however, where controls are necessary to meet legal objectives. If these process steps are not chosen as CCPs they should nevertheless be included in the plan of HACCP-based procedures as Control Points (CPs) required by legislation and which are to be monitored and corrective actions taken.

Examples of those control points are:

- acceptance of animals for slaughter, to ensure animals are identified, clean, healthy etc.
- evisceration and dressing, to ensure absence of visible contamination.
- SRM controls, to ensure absence and proper disposal of SRM
- temperature controls to limit growth of micro-organisms
- receipt / pre-cut inspection of raw meat, to ensure raw materials are free from contamination.

Reference: See [MIG 'Application of HACCP principles'](#) for additional information.

Continued on next page

Principle 2 – Determine the Critical Control Points (CCPs)/Control Points (CPs), Continued

**CCPs/ CPs
common
issues**

The following table contains examples of common issues that the OV could find when auditing HACCP based procedures and guidance on how the OV should make the assessment to determine FBO compliance:

Common Issues	OV advice/guidance
CCPs either not present or not identified correctly	In certain food businesses there will be steps in the process that are critical to the safe production of food, e.g. cooking a raw food to a specified core temperature. A decision tree may be used to determine CCPs. On the other hand, a small-medium slaughterhouse or cutting plant handling raw meat may follow a generic approach where CCPs / CPs are pre-determined and so a decision tree may not be needed.

Principle 3 – Establish Critical Limits (CLs)/Legal Limits (LLs)

Establishing CLs/ LLs

Establishing critical limits (CLs) (or legal limits (LLs)) at CCPs (or CPs) which separate acceptability from unacceptability for the prevention, elimination or reduction of identified hazards.

Regulation: (EC) 852/2004 Article 5, 2(c).

Limits do not need to be a fixed numerical value that requires measurement. Limits can be monitored through visual observation, e.g. faecal contamination of carcasses.

Difference between CLs and LLs

CLs separate acceptability from unacceptability or safe from unsafe food at CCPs. CLs must be at least as strict as legal requirements that apply at that process step e.g. temperatures for raw meat.

LLs are values set out in the legislation to be used where FBOs have decided to have CPs (instead of CCPs) which are legal requirements.

CLs/ LLs – common issues

The following table contains examples of common issues that the OV could find when auditing HACCP based procedures and guidance on how the OV should make the assessment to determine FBO compliance:

Common Issues	OV advice/guidance
Hygiene controls set as Critical Limits	<p>In a technical HACCP system CLs may include:</p> <ul style="list-style-type: none"> • values of : temperature, time • maximum residue limits • maximum levels (of contaminants) • microbiological criteria • levels of chlorine, etc.

Continued on next page

Principle 3 – Establish Critical Limits (CLs)/Legal Limits (LLs), Continued

CLs/ LLs – common issues, (continued)

Common Issues	OV advice/guidance
Hygiene controls set as Critical Limits, (continued)	<p>In some cases the plan of HACCP based procedures may not distinguish critical limits from the application of hygiene controls e.g.: cleaning procedures/ maintenance procedures/ pest control etc.</p> <p>Where FBOs have decided to have CPs (instead of CCPs) which are legal requirements, the LLs may include strict adherence to a hygiene control.</p> <p>This does not have an adverse effect on the safety of food.</p>

Principle 4 - Monitoring of Critical Control Points (CCPs)/Control Points (CPs)

Monitoring procedures

Establishing and implementing effective monitoring procedures at CCPs (or CPs).

Regulation: (EC) 852/2004 Article 5, 2(d)

Monitoring procedures – common issues

The following table contains examples of common issues that the OV could find when auditing HACCP based procedures and guidance on how the OV should make the assessment to determine FBO compliance:

Common Issues	OV advice/guidance
Monitoring procedures not recorded	Monitoring procedures are an important part of a HACCP based system, in some cases monitoring may not be recorded, or recorded just to pass an audit, and have no bearing on what is actually happening in the meat plant. <u>Reference:</u> Principle 7 'Documentation'.
Plan not a true reflection of reality	The monitoring procedures described in the plan should reflect those actually carried out.
Disproportionate monitoring procedures	Extensive record keeping may prove to be burdensome for a FBO to maintain (for instance when documentation/ records have been produced by a third party (consultant) who does not understand the food business operations, e.g. <ul style="list-style-type: none"> • twice daily recordings carried out by staff of the temperature of all knife sterilisers using a probe thermometer – resulting in hundreds of manual checks per week. • daily manual recordings of the air temperature of a chiller using a probe thermometer that is already monitored automatically and linked to a warning alarm.

Continued on next page

Principle 4 - Monitoring of Critical Control Points (CCPs)/Control Points (CPs), Continued

Monitoring procedures – common issues, (continued)

Common Issues	OV advice/guidance
<p>Disproportionate monitoring procedures, (continued)</p>	<p>Monitoring is 'The act of conducting a planned sequence of observations or measurements of control parameters to assess whether a CCP (or CP) is under control' therefore monitoring may or may not include written records of any checks carried out.</p> <p>Information recorded will be dependant on the risk of the operations, i.e. type of food and size of the business.</p> <p>Documentation should not cause an unnecessary burden to small-medium businesses.</p> <p>The FBO may choose to record by exception (using a diary such as the Food Safety Management Diary for Meat Producers) in which case the amount and type of records will not be the same as those used in a traditional HACCP system.</p> <p>The Diary may also be the preferred choice of the FBO to record occasional checks, e.g. product temperatures taken on a daily basis, rather than recording on separate sheets of paper.</p> <p><u>Reference:</u> See the topic "Principle 7 – Documentation" in this section for additional information.</p>

Principle 5 – Corrective Action Procedures

Establishing corrective actions

Establishing corrective actions when monitoring procedures at CCPs (or CPs).

Regulation: (EC) 852/2004 Article 5, 2(e).

Corrective actions – common issues

The following table contains examples of common issues that the OV could find when auditing HACCP based procedures and guidance on how the OV should make the assessment to determine FBO compliance:

Common Issues	OV advice/guidance
Plan not a true reflection of reality	The corrective action procedures described in the plan should reflect those actually carried out.
Corrective actions not recorded	<p>Corrective actions are an important part of a plan of HACCP-based procedures to bring production back under control. In some cases the actions taken may not be recorded as the FBO does not want to admit to failures. The impression given is that the FBOs never have any problems with their hygiene control procedures.</p> <p>In fact, the record of corrective actions shows that the plan based on HACCP principles is a 'healthy' plan that works effectively.</p> <p>Corrective actions should ensure that the risk to consumers are eliminated, prevented or reduced e.g. trimming of faecal contamination.</p>

Continued on next page

Principle 5 – Corrective Action Procedures, Continued

Corrective actions – common issues, (continued)

Common Issues	OV advice/guidance
Corrective actions not recorded, (continued)	<p>Problems always occur and records should be made when they do.</p> <p>These records are important for the FBO to enable verification of the HACCP based system.</p> <p>Examples on how to record corrective actions may include:</p> <ul style="list-style-type: none">• a comment made on a cleaning check-sheet when problems have been identified during cleaning by staff.• entering the problem and the action taken by use of a diary such as the Food Safety Management Diary for Meat Producers.

Principle 6 – Validation, Verification & Review

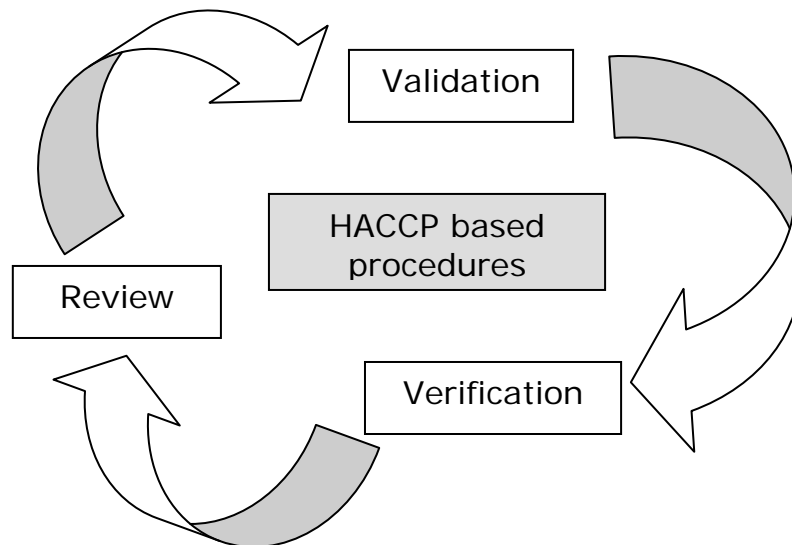
Validation The FBO is required to validate the plan before implementation and after any amendments or reviews.

Verification Establishing procedures which shall be carried out regularly to verify that what is written in the HACCP plan is actually being carried out in the work place and is working effectively.

Regulation: (EC) 852/2004 Article 5, 2(f).

Review When any modification is made in the product process, or any step, the food business operators shall carry out a review of the HACCP based procedure plan(s) to ensure that the plan(s) and associated documentation are up to date.

Regulation: (EC) 852/2004 Article 5, 2.



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Principle 6 – Validation, Verification & Review, Continued

**Validation/
Verification/
Review –
common
issues**

The following table contains examples of common issues that the OV could find when auditing HACCP based procedures and guidance on how the OV should make the assessment to determine FBO compliance:

Common Issues	OV advice/guidance
Plan not a true reflection of reality	The validation, verification and review procedures described in the plan should reflect those actually carried out.
No records of Verification/ Validation/ Review of the HACCP plan(s)	<p>Plans based on HACCP principles allow for flexibility in the application. The FBO may combine validation (of the HACCP plan), verification and review (of the system); as it may be difficult for the FBO to distinguish between them.</p> <p>Absence of separate validation / verification / review checks does not necessarily mean these have not been carried out.</p> <p>Verification of these procedures may be completed by an internal audit / or external audit(s) carried out by the competent authority or third party auditors.</p> <p>Examples of separate validation, verification and HACCP plan review forms are provided in the Food Safety Management Diary for Meat Producers which the FBO may choose to use.</p> <p>If the Diary is used the 4-weekly reviews also accomplish verification of the FBOs hygiene controls.</p>

Continued on next page

Principle 6 – Validation, Verification & Review, Continued

Microbiology Microbiological testing is another way of verification of HACCP based procedures.

Microbiological requirements are contained in Regulation (EC) 2073/2005.

Surface microbiological testing is not a legal requirement but the FBO may decide to do so as a way of verification of their cleaning procedures.

Reference: See Section 3 “Microbiological Criteria” in this chapter for additional information.

Principle 7 – Documentation

Establish documents and records

Establishing documents and records commensurate with the nature and size of the business to demonstrate the effective application of the measures outlined in subparagraphs (a) to (f), i.e.

- a. Identifying hazards
- b. Identifying CCPs (or CPs)
- c. Establishing CL (or LL) at CCPs (or CPs)
- d. Establishing and implementing monitoring procedures
- e. Establishing corrective actions
- f. Establishing verification procedures (including validation and review)

Regulation: (EC) 852/2004 Article 5, 2(g).

Types of documents and records

Three types of paperwork are necessary:

- HACCP plan(s) documenting application of HACCP principles (may be a generic plan – amended to reflect the company procedures including prerequisites that are control measures)
 - company’s HACCP-based procedures, policies, staff instructions (should include prerequisites as control measures)
 - records of monitoring, corrective action, verification and review (the Food Safety Management Diary may be used).
-

Documentation – common issues

The following table contains examples of common issues that the OV could find when auditing HACCP based procedures and guidance on how the OV should make the assessment to determine FBO compliance:

Common Issues	OV advice/guidance
Plan not a true reflection of reality	The documentation referred to in the plan of HACCP-based procedures should reflect those actually maintained by the FBO.

Continued on next page

Principle 7 – Documentation, Continued

Documentation – common issues, (continued)

Common Issues	OV advice/guidance
Disproportionate documentation	<p>Documentation, especially if it is produced by an external adviser, may be disproportionate to the size, type of business and type of food produced. It may be too technical for the FBO or plant staff to understand or follow; it may duplicate existing records or seek to introduce a far more complex system of recording than is appropriate.</p> <p>In these cases it may be appropriate to encourage the FBO to consult with their advisor/consultant and work together to produce a workable, more easily managed HACCP based system, reminding the FBO that the HACCP based system is their control system and they should retain ownership.</p>

Food Safety Management Diary for Meat Producers (The 'Diary')

The use of the FSA's [Food Safety Management Diary for Meat Producers](#) (the 'Diary') is an acceptable method of record keeping.

When using the diary, the FBO or other responsible person should sign the Diary every day to say:

- opening, operational and closing checks have been carried out
- hygienic production has been followed.

These are not just a tick in a box, if these have been ticked the workplace must accurately reflect the check carried out e.g. areas, equipment are/is clean, knife sterilisers are working correctly, etc.

Continued on next page

Principle 7 – Documentation, Continued

**Food Safety
Management
Diary for
Meat
Producers
(The 'Diary'),
(continued)**

The daily Diary pages are **not** intended to replace all existing documentation. They will need to be supported by additional record forms and procedures/staff instructions such as:

- individual staff training records
- cleaning schedules
- maintenance plans.

The Diary provides examples of such documents that FBOs may adapt for their own use. FBOs may choose to keep such prerequisite records in the Diary binder.

The use of the Diary by FBOs is voluntary. It will not be appropriate in businesses that already have good existing records, and may not be entirely sufficient where, for example, the business is accredited to a Quality Assurance scheme or customers require more extensive documentation.

Reference: an electronic version of the Diary can be found at <http://www.food.gov.uk/multimedia/pdfs/foodmandiary2008.pdf>

**Exception
recording**

FBOs may choose to do exception recording, i.e. only to make record when a problem or something out of the ordinary is identified and the corrective actions to regain control. This applies particularly to checks that are more or less continuous e.g. visual monitoring of each carcass, or where separate checklists are kept e.g. cleaning checks.

Examples of exceptional recording:

- record when temperatures exceed the critical/ legal limit and the action taken to regain control instead of having to tick/cross a separate list
- instead of making ticks and crosses in a cleaning checklist everyday, an alternative could be recording only when cleaning problems are identified including the corrective action
- trimming contamination from a carcass
- recording problems that occur during a process e.g. gut spillage during evisceration.

Continued on next page

Principle 7 – Documentation, Continued

Exception recording, (continued)

- action taken when there are signs of pest infestation.
- action taken if refrigeration equipment requires repair
- problems with faulty equipment and what was done to put it right.
- staff not adhering to pre-requisite or other procedures and what corrective actions were required e.g. supplementary or refresher training, cleaning of a piece of equipment etc.
- knife sterilisers that are not working at 82°C or above and what corrective actions were required e.g. repair / renew equipment.

FBOs should nevertheless be encouraged to record the results of occasional checks to demonstrate that their procedures are working effectively, e.g.

- periodic checks of knife sterilisers
- chiller temperatures, etc.

Problems and corrective actions taken do not show a weak HACCP plan but a healthy HACCP plan that works effectively.

Management checks

Management checks are an integral part of FBO food safety management to ensure that prerequisite controls are working effectively.

Four weekly checklists are provided in the Diary to encourage FBOs to undertake a regular review of all aspects of their hygiene controls. There is space to record any persistent problems (which may include concerns raised by OV inspections or audits) or any significant changes that have been made and how they are being dealt with, including any consequences for their HACCP-plans.

Reference: See the topic “Principle 6 - Validation, Verification & Review” in this section for additional information.

Section 3 – Microbiological Criteria

Section Overview

In this section

The table below lists the topics in this section.

Topic	See Page
Legislation and Guidance Documents	3-2
Microbiological Criteria	3-3
FBO Responsibilities	3-4

Legislation and Guidance Documents

**(EC)
2073/2005**

(EC) 2073/2005 sets out the microbiological criteria for certain micro-organisms and the implementing rules to be complied with by FBOs, when implementing the general and specific hygiene measures referred to in Regulation (EC) 852/2004.

**(EC)
178/2002**

(EC) 178/2002 lays down general food safety requirements, according to which food must not be placed on the market if it is unsafe.

FBOs have an obligation to withdraw unsafe food from the market.

**(EC)
852/2004**

FBOs are required to comply with microbiological criteria.

Regulation: (EC) 852/2004, Article 4.

**Food
Hygiene
(E/S/W)
Regulations
2006**

The Food Hygiene (E/S/W) Regulations 2006 (as amended) make it an offence for any person to contravene or fail to comply with the specified community provisions.

Schedule 2 of these Regulations lays out the requirement in respect of EC 2073/2005, in that the FBO will have to take the appropriate measures laid down in Article 7, Paragraphs 2 to 4 when test results prove unsatisfactory.

**Guidance for
FBO**

FBOs can find guidance in relation to the microbiological requirements in the following documents:

- the Meat Industry Guide (MIG)
- the FSA webpage <http://www.ukmeat.org/>

The MIG chapter and/or webpage information should be read by OV's advising on or auditing the application of HACCP principles, including the microbiological requirements.

Microbiological Criteria

Microbiological Criteria (EC) 2073/2005

(EC) 2073/2005 defines two types of microbiological criteria described in the following table:

Microbiological Criteria	Characteristics
Food Safety Criterion	It defines the acceptability of a product or batch of foodstuff applicable to products placed on the market
Process Hygiene Criterion	It is an indication of the acceptable functioning of the production process. It is not applicable to products placed on the market, but sets contamination values above which corrective actions are required to maintain the hygiene of the process in compliance with food law.

Microbiological Criteria and HACCP based procedures

Microbiological criteria form an integral part of the implementation of HACCP based procedures. Food stuffs should not contain micro-organisms in quantities that present a risk to human health and therefore

- where food safety (pass/fail) criteria are set, these legal limits should inform the critical limits in HACCP food safety management systems
 - where process hygiene criteria are set they provide a standard for verifying the effectiveness of the HACCP-based food safety management systems.
-

FBO Responsibilities

Testing requirements

Depending on the size and nature of the operations, FBOs may be required to sample carcass or products in accordance with the provisions set out in Annex 1 to the Regulation (EC) 2073/2005.

Reference: See the MIG and <http://www.ukmeat.org/> for additional information on the testing frequencies, types of microorganisms that have to be tested for and sampling techniques.

FBO actions

Where unsatisfactory results are obtained the FBO must take action in accordance with (EC) 2073/2005, Article 7, paragraphs 2 to 4, as well as the appropriate corrective action defined in their HACCP plans and any additional action to protect public health.

Depending on which microbiological criteria fail to meet the required standards, the FBO is required to take different actions according to the following table:

Reference: See the MIG and <http://www.ukmeat.org/> for additional information on the type of corrective actions that the FBO should undertake.

Continued on next page

FBO Responsibilities, Continued

FBO actions, (continued)

Microbiological Criteria	FBO Action
Food Safety Criteria	<p>Unsatisfactory results against food safety criteria will require the product or batch of foodstuffs to be withdrawn or recalled by the FBO in accordance with Article 19 of EC Regulation 178/2002.</p> <p>Products that have not yet reached the retail level may be submitted for further processing at a wholesale level to eliminate the hazard in question.</p>
Process Hygiene Criteria	<p>Where unsatisfactory results from process hygiene criteria are obtained, the FBO must take action in accordance with Regulation (EC) 2073/2005, Annex 1, Chapter 2, including, for slaughterhouses, improvements in slaughter hygiene and review of process controls and for minced meat, MSM, meat preparations, improvements in product hygiene and in selection and/or origin of raw materials.</p>

**Withdrawal/
recall of
product**

Withdrawal/recall of product following unsatisfactory results is an FBO responsibility:

- if the product is at retail and intended to be cooked it must be withdrawn
- if the product is ready to eat a recall is required.

In such cases the FBO will need to report the non-compliance to the FSA Incident Branch on 020 7276 8735 (Fax number 020 7276 8788/8446) or by completing the online report which can be found via the following link:

[Food Standards Agency - Incident form](#)

Further FBO guidance is provided in the MIG, Part 3, Chapter 2, D Unsatisfactory results.

Continued on next page

FBO Responsibilities, Continued

**Withdrawal/
recall of
product,
continued**

Where the FBO is reluctant to do so the OV may inform the MHS helpline (01904 455774) and FSA Incident Branch.

**Analysis of
results**

FBOs are required to analyse trends in test results. If these reveal a trend towards unsatisfactory results, the FBO must act without delay to prevent the occurrence of microbiological risks.

Regulation: (EC) 2073/2005 Article 9

**OV checks on
sampling
results**

The OV should view, and if appropriate note down, sampling results over a period of time, so that s/he can verify the FBOs compliance with the legislation.

Reference: See the MIG and/or www.ukmeat.org for additional information on the limits on acceptability/unacceptability of microbiological results and the FBO actions.

Section 4 - Audit and Enforcement

Section Overview

In this section

The table below lists the topics in this section.

Topic	See Page
OV Audit of HACCP Principles and Microbiological Testing	4-2
Enforcement - HACCP	4-5
Enforcement – Microbiological Criteria	4-7

OV Audit of HACCP Principles and Microbiological Testing

Form AUD 9/3

OV's should use the audit form AUD 9/3 to audit FBO compliance in the application of HACCP based procedures.

Reference: See [MHS Intranet - AUD Forms](#)

When one establishment has several HACCP based procedures plans, the OV only need to complete one part 2.5 of the form AUD 9/3 which will cover the audit findings for all the HACCP based procedures plans of one establishment.

Confidence in FBOs Food Management Systems AUD 9/3

The results of the audit of the FBO compliance in the application of HACCP based procedures is one of the main audit components to be used by the OV to determine the 'confidence in FBOs food management systems' score in part 2.5 of the form AUD 9/3.

OV HACCP audit objectives

The objective of the OV audit should be:

- can the FBO show that s/he has implemented and is maintaining a system based on HACCP based procedures to a reasonable degree?

Note: HACCP based procedures will not work without sufficient/adequate/appropriate prerequisites (good hygiene practices) being in place (as required by Regulation (EC) 852/2004 in particular).

Continued on next page

OV Audit of HACCP Principles and Microbiological Testing, Continued

Technical deficiencies

The plan based on HACCP principles may not be technically correct but this does not make it invalid (or require formal enforcement action) as it may achieve the main purpose of controlling the main hazard for the production of safe food.

Example:

A flow diagram that does not correctly reflect the operations carried out; however, there is no risk for public health as the risks have been correctly identified.

Reference: See "OV Advisory Role" in the topic "Enforcement – HACCP" in this section for additional information.

OV HACCP audit

The OV should determine through part 2.5 of the AUD 9/3 the FBO level of compliance as 'good', 'adequate', 'weak' or 'poor'.

The aide-memoiré in part 2.5 of the AUD 9/3 describes the '**good**', '**adequate**', '**weak**' or '**poor**' criteria. The decisions on which criteria is appropriate is a matter of professional judgment of the OV auditor based on the guidance provided in this chapter and in the MIG Chapter.

OV Audit of HACCP Principles and Microbiological Testing, Continued

OV microbiological testing audit

The OV should verify that the FBO complies with the microbiological sampling requirements, laid down in (EC) 2073/2005, in accordance with (EC) 882/2004.

OV verification and reporting through part 2.5 of AUD 9/3 include:

FBO responsibility for

- sampling at the required frequency
- following the sampling rules
- interpretation of the sampling results (do these look manufactured or unrealistic?)
- identification of patterns and trends in test results
- identification of failures in the processing techniques that should have been identified and addressed
- corrective action, where necessitated by the results obtained
- a product recall, where necessitated as a result of unsatisfactory food safety criteria results.

Reference: See the MIG and FSA webpage:
<http://www.ukmeat.org/> for additional information.

Enforcement - HACCP

OV advisory role

Where the OV finds that the FBO has HACCP based procedures but there are deficiencies that do not pose a public health risk, the OV should not serve a formal notice, but advise, educate and encourage rectification of the HACCP based procedures.

The FBO may be directed to the MIG for guidance, and in particular the advice on HACCP training, as well as to the Meat Plant HACCP Manual and the Food Safety Management Diary sample documents.

Reference:

For guidance on HACCP implementation refer to <http://www.food.gov.uk/multimedia/webpage/haccparchive/haccpdoc03>

The electronic version of the Diary can be found at <http://www.food.gov.uk/multimedia/pdfs/foodmandiary2008.pdf>

The OV advisory role does not extend to personally writing any part of the FBOs food safety system e.g. HACCP plans, monitoring documentation, etc.

Objective evidence

It is essential to gather evidence of legal contraventions e.g.

- the slaughter for human consumption of animals whose identity cannot be reasonably ascertained,
 - carcasses presented with faecal contamination at post mortem inspection, when these are related to the inadequacy (or non-existence) of the FBOs HACCP-based food safety management procedures.
-

Notification to the FBO of deficiencies

If after verbal advice and an advisory letter the FBO has made:

- no effort to implement a food safety management system based on HACCP based procedures, or
 - negligible effort to implement a food safety management system based on HACCP based procedures, or
 - once implemented, the FBO has failed to maintain a system based on HACCP based procedures.
-

Continued on next page

Enforcement - HACCP, Continued

Notification to the FBO of deficiencies,
(continued)

The OV is to serve a Hygiene Improvement Notice (HIN) for each of the HACCP principles that are not being complied with.

Regulation: (EC) 852/2004, Chapter II, Article 5 and (EC) 853/2004, Annex II, Section II.

Plant functions

Separate HIN's are to be served on each of the establishment's approved functions, i.e. slaughtering, cutting, etc. Separate notices avoid:

- having to withdraw an entire notice that has only be partially complied with
 - the suspension of entire notices because of appeals over one issue, and
 - the service of more notices on those areas still outstanding.
-

Time scales for compliance with formal notices

The timescale for compliance with the HIN will depend upon the size of the establishment, the nature and complexity of the operations and the history of compliance of the FBO.

The OV is responsible for making an assessment of the specific circumstances for the plant to provide a reasonable timescale in line with the enforcement concordat and risk based procedures (i.e. it is proportionate).

Failure to comply with the notice

If the FBO fails to comply with the HIN(s), the OV should recommend prosecution by completing the Prosecution Report (ENF 11/6).

Reference: See Chapter 9 "Forms".

The OV must keep a record of the FBOs progress on HACCP implementation made after a recommendation for prosecution has been made. This will help identify actions that should have been taken earlier and will help to counter any mitigating factors that the FBO puts forward if the case goes to court.

OV records of FBO compliance

The OV must keep records in the plant daybook and the audit report form (AUD 9/3) of the advice given to the FBO.

Enforcement – Microbiological Criteria

OV advisory role

When the OV finds that the FBO is not following the microbiological requirements contained in (EC) 2073/2005, the OV should educate and encourage rectification providing advice.

The FBO may be directed to the MIG and/or the webpage www.ukmeat.org

OV actions

The following table contains examples of FBO non compliance and the possible enforcement actions that the OV may take.

Before taking formal action the OV must ensure that enforcement actions are in line with Chapter 7 - Enforcement.

FBO fails to...	OV informal action...	OV formal action...
Comply with the number of samples frequency of testing for the required microorganisms (see FSA guidance on reduced testing www.ukmeat.org)	Verbal advice/ Written advice	HIN

Continued on next page

Enforcement – Microbiological Criteria, Continued

OV actions, (continued)

FBO fails to...	OV informal action...	OV formal action...
Perform withdrawal/recall/hazard elimination procedures (for unsatisfactory food safety criteria)	Verbal advice/ Written advice	3. Determine whether the FBO wants to use the batch for a purpose other than that for which it was originally intended. This is permissible if: <ul style="list-style-type: none"> a) it does not pose a risk to public or animal health b) the use has been decided within the procedures based on HACCP and good hygiene practice, and c) the use has been authorised by the competent authority. 4. If neither 2 nor 3 apply, seek voluntary surrender or seizure in accordance with procedures in MOC Chapter 7, section 3.
Do the trend analysis of results and take adequate corrective actions		HIN
Take adequate corrective actions (for unsatisfactory process hygiene criteria)		HIN RAN

Continued on next page

Enforcement – Microbiological Criteria, Continued

OV actions, (continued)

FBO fails to...	OV informal action...	OV formal action...
Heat treat MSM produced in accordance to 853/2004, Annex III, Section V, Chapter III, 3 with unsatisfactory Salmonella results if it is to go into the food chain	Verbal advice/ Written advice	Detain, seek voluntary surrender or seizure in accordance with procedures in MOC Chapter 7, Section 3
