



# Temporary Operational Instruction

**Action note: 2026-03-02 - Chapter 4.1 of the  
Manual for Official Controls (MOC)  
Changes to the FBO Audit System in Approved  
Meat Establishments**

## Purpose

This action note is to inform operational staff of a new temporary operational instruction relating to the **Implementation of various changes to the FBO Audit System for approved meat establishments following the FSA Veterinary Audit Review Project.**

## Background

Over the past year, the Veterinary Audit Team within the Food Standards Agency (FSA) has undertaken a comprehensive review of the current FBO Audit System.

Throughout the process, the team engaged with a broad range of stakeholders including industry members and representatives through dedicated consultation sessions. The findings and recommendations arising from this collaborative work have now been reviewed, presented to stakeholders, and agreed.

We are pleased to inform that the project has now concluded, and the following changes should be incorporated into the Audit System.

## Procedure

Please see the Annex for a detailed list of the changes.

## Front line staff are required to note the following action

Please review the contents of the Action Note carefully, in particular Veterinary Auditors:

- must ensure they fully understand the content and implement the required changes immediately
- discuss the Action Note with Food Business Operators during audits
- raise any concerns or clarification needs with their Audit Veterinary Lead as necessary.

# Distribution

This action note will be:

- uploaded to the [Temporary Operational Instruction Folder held in the MOC area of SharePoint](#) (accessible only on an official FSA device)
- logged on the [Temporary Operational Instruction tracker](#) (accessible only on an official FSA device)
- published alongside the [MOC chapters on food.gov.uk](#)

The action note will remain live until either incorporated into the MOC or revoked.

# Annex

## Key changes to current procedures

### Request to change the auditing frequency / early audit (MOC Chapter 4.1, Section 4.6.2)

On FBO formal request, the date of the audit may be brought forward under certain specific circumstances. This request will be assessed on a case-by-case basis by the auditor with the approval of their AVL. FBOs wishing to bring the audit forward should request it to the auditor doing the last audit or to their AVL. If agreed, the auditor will complete the relevant link in K2 for the system to change the audit due date.

The following conditions will apply to any request:

- The scheduled audit frequency can be changed to annual if the audit is within the extended frequency or if the previous outcome was Good and the next audit is due in 18 months.
- If the previous outcome was Generally Satisfactory (GS), the audit can be brought forward a maximum of six months prior to the due date only when all Major NCs have been signed off as complete by the first partial audit and, in the case of stand-alone cutting plants, an unannounced inspection (UAI) has been completed as specified in the requirements.
- An early audit should not be requested immediately after an unsatisfactory audit (this includes audits with Improvement Necessary (IN) or Urgent Improvement Necessary (UIN) outcomes).

### **NC closed count to outcome vs do not count to outcome (MOC Chapter 4.1 Section 4.6.5)**

On exceptional circumstances, and on a case-by-case basis, the auditor may consider that closed non-compliances (NCs) (regardless of the score) for isolated issues that have been effectively and consistently addressed during the audited period do not count to the audit outcome.

This would also apply to NCs closed after the first partial audit when considered in the next full audit.

The Auditor would need to discuss each case with their AVL and the not counting to outcome would require clearance from the Head of Veterinary Audit. If the closed NC was Major or Critical and the final audit outcome is Good for a second consecutive audit, the extended audit frequency approach would not be applicable.

The K2 system will establish the audit frequency automatically, but auditors should continue to monitor that the calculated frequency is as expected.

### **Use of the link tool (MOC Chapter 4.1 Section 4.6.6)**

Linking too many NCs can lead to an unclear audit outcome (for example an audit with Good outcome with many NCs linked denoting that systems are not being effectively managed) and can complicate the completion of future reports if breaking the link is required. To avoid the excessive use of the link facility, if an auditor attempts to link a NC against two or more questions, then a message appears for awareness.

### **Add an observation box to each question (MOC Chapter 4.1 Section 5.2.1)**

An observation box will be added to each question of the audit report to point out potential areas for improvement, highlighting something that is not fully effective, not

consistently applied, or issues that could pose a risk in the future if not addressed. Issues raised in the observation box will not impact the audit outcome but will be reflected in the report which will allow assessing progress in the following visits.

**Audit outcome and frequency of inspections (MOC Chapter 4.1 Section 5.3)**

Following an Improvement Necessary (IN) or Urgent Improvement Necessary (UIN) outcome, the best possible outcome that can be achieved in the next full audit is Generally Satisfactory (GS).

If the outcome of the first full audit after an establishment has been in IN/ UIN is GS, the following full audit must be carried out within six months rather than the standard one-year interval. Upon completion of this audit, the normal audit cycle will resume. The K2 system will establish the audit frequency automatically. Auditors should continue to monitor that the calculated frequencies are as expected.

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