Manual for Official Controls: Amendment 95

Chapter 2.10 Inspection and Attendance

Sections

1. OV Flexible Attendance 2

2. PIA System 20

3. Annexes 32

1. OV Flexible Attendance

1.1 Introduction

1.2 Flexible attendance general issues

1.3 Implementation of flexible attendance

1.4 Specific requirements: Red meat slaughterhouses

1.5 Specific requirements: Game handling establishments

1.6 Specific requirements: Poultry establishments with MHI inspection

1.7 Monitoring of establishments with flexible attendance

1.8 Review / removal of flexible attendance

1.9 FSA role

1.1 Introduction

1.1.1 Objective

This document sets out guidance for Field Veterinary Co-ordinators (FVCs) to enable them to identify slaughterhouses and game handling establishments (GHEs) that do not require the full time presence of an Official Veterinarian (OV) during post-mortem inspection (PMI) and to assess the OV hours required. The objective of the procedure is to provide a risk base framework to aid consistent decision making in respect of OV attendance.

1.1.2 Legislation

Regulation (EU) 2017/625 requires the competent authority (CA) to ensure that an OV is present at slaughterhouses throughout ante-mortem and PMI and at GHEs throughout PMI but has allowed the Commission to make exceptions to this general requirement in delegated acts.

(Delegated Regulation (EU) 2019/624 allows for some exceptions to this requirement in in low-capacity slaughterhouse or game-handling establishments.

Post-mortem inspections may be performed by an official auxiliary under the responsibility of the official veterinarian (OV is not present on the premises, see definition below in 1.2.1), when the following criteria and conditions are met:

(a) the slaughter or game-handling activities are carried out in a low-capacity slaughterhouse or game-handling establishment which slaughters or handles:

(i) less than 1 000 livestock units per year; or

(ii) less than 150 000 poultry, lagomorphs and small wild game per year;

(b) the competent authority may increase the thresholds laid down in point (a) ensuring that the derogation is applied in the smallest slaughterhouses and game handling establishments complying with the definition of low-capacity slaughterhouse or game-handling establishment (further details in Legislation)

(c) the establishment concerned has sufficient facilities to store meat with abnormalities separately from other meat until the official veterinarian can inspect the meat with abnormalities in person;

(d) the official veterinarian is present in the establishment at least once a day, including regularly during slaughter activities;

(e) the competent authority has put in place a procedure to assess on a regular basis the performance of official auxiliaries in these establishments, including:

(i) monitoring individual performance;

(ii) verifying documentation on inspection findings and comparing it with the corresponding carcasses;

(iii) checks of carcasses in the storage room;

(f) a risk analysis has been carried out by the competent authority, taking at least account of the following elements:

(i) the number of animals slaughtered or handled per hour or per day;

(ii) the species and class of animals slaughtered or handled;

(iii) the throughput of the establishment;

(iv) the historical performance of slaughter or handling activities;

(v) the effectiveness of any additional measures in the food chain taken to guarantee the food safety of animals intended for slaughter;

(vi) the effectiveness of the hazard analysis and critical control point (HACCP)-based procedures;

(vii) audit records;

(viii) the competent authority's historical records of ante-mortem and post-mortem inspections

Reference: Regulation (EU) 2019/624 Article 7

1.2 Flexible attendance general issues

1.2.1 Definitions

'Under the responsibility of the official veterinarian' means that the official veterinarian assigns the performance of an action to an official auxiliary.

'Under the supervision of the official veterinarian' means that an action is performed by an official auxiliary under the responsibility of the official veterinarian and the official veterinarian is present on the premises during the time necessary to perform that action.

'Low-capacity slaughterhouse' means a slaughterhouse designated by the competent authorities on the basis of a risk analysis and in which slaughtering takes place only during part of the working day or takes place during the whole working day but not on each working day of the week.

'Low-capacity game-handling establishment' means a game-handling establishment designated by the competent authorities on the basis of a risk analysis and in which game-handling takes place only during part of the working day or takes place during the whole working day but not on each working day of the week.

Flexible attendance – a risk assessment shows that the OV's continuous presence during post-mortem inspection is not required.

Full time attendance – the OV is required to be continuously present at the premises throughout ante and post-mortem inspection.

For the purposes of applying OV flexibilities at all qualifying premises, EU regulations permit reduced OV presence on the basis of a risk assessment which shall cover public health, animal health and welfare assessments.

100% OV attendance (throughout post-mortem inspection) is not required when the Meat Hygiene Inspectors (MHIs) carry out post-mortem inspection at establishments meeting the flexible attendance risk assessment criteria.

1.2.2 Statement of resources

The Statement of Resources (SOR) meetings between the FSA and FBOs capture the service requirements for official controls. This guidance will help assess these service requirements and best options for delivery.

SORs must capture the flexibility arrangements agreed with the FBO in the other business information section of the SOR template. Inspection Team Leaders (ITLs) should capture the OV Flexibility requirement on the SOR as follows:

- Outline the FVC recommendation of OV Flexibilities
- Capture broadly any flexible start/ finish time of the OV as recommended by the FVC liaising with the FBO and OV contract supplier.
- System for OV/FBO communications in adopting the flexibility recommendations, for example, a 1 hour reduction of OV attendance on a particular day for ante-mortem activities may be agreed on a daily basis between OV and FBO with a note made in the daybook by OV.

ITLs must make business decisions for the SOR to establish the most cost efficient service which may result from OV Flexibilities at individual premises. The OV may be retained on site carrying out other inspection duties thereby reducing other elements inspection team costs such as premium rate working of employed inspectors.

The OV may continue to provide a versatile resource in the team carrying out meat inspection, CCIR activities, detention line work and other monitoring and verification which must be considered by ITLs to establish the most cost efficient service at individual establishments.

1.2.3 Inspection tasks

The OV must be allowed sufficient time to carry out the inspection tasks required by Regulation (EU) 2017/625 and detailed in Regulation (EU) 2019/627:

- checks on FCI
- ante-mortem inspection; which can be carried out up to 24 hours before slaughter

- verification of compliance with welfare regulations
- post-mortem inspection
- checks on removal, separation and marking of SRM and ABP
- ensuring sampling takes place, for example, residues, trichinella, TB, TSE.

OAs may assist the OV with all the above tasks.

Note: For details, please check sub-topic 1.3.7 on 'Daily OV tasks' and sub-topic 1.3.8 on 'Team tasks' in topic 1.3 on 'Implementation of flexible attendance'.

In relation to flexible attendance, it is important to note that OVs, when present, will constantly be checking on compliance with the Hygiene Regulations and, where necessary, carry out enforcement. However, the Regulations do not require OVs to remain at an establishment specifically to carry out hygiene checks once they have completed their responsibilities as above unless they have identified public, animal health and / or welfare issues that require their continued presence.

1.2.4 Cold inspection

'Cold inspection' occurs when there is no official presence during dressing of carcases. The OV leaves after ante-mortem inspection and returns later to carry out post-mortem inspection. Please see Annex 11 of this chapter.

1.2.5 Risk analysis

The Regulations require a risk analysis to be carried out to determine whether flexible attendance can be implemented at specific premises. The risk analysis is primarily carried out to assess the risk that unfit meat might be placed on the market if the OV is not present to supervise post-mortem inspection. The following points are to be taken into account when carrying out the risk assessment:

- current capacity / number of animals slaughtered / handled daily including procedures and facilities to detain uncommon abnormalities
- species and class of animals slaughtered (for example, older animals are likely to have a greater number of abnormalities requiring OV attention)
- the history of the quality of animals and the need for carcases to be detained
- the history of the performance of slaughter / handling activities

- the effectiveness of the HACCP-based system in place
- audit records and history of official AM and PM records.

Reference: (EC) 2019/624, Article 7

1.2.6 Comparison between full time and flexible attendance

The following chart shows the comparison between full time and flexible attendance requirements:

Full time Attendance	AM	PM
Slaughterhouses	OV	OV / MHI / PIA
GHEs	N/A	OV / MHI

Flexible Attendance	AM	PM
Slaughterhouses	OV	MHI / OV part time
GHEs	N/A	MHI / OV
Premises with Cold Inspection	OV	OV / MHI (end of operations)

1.3 Implementation of flexible attendance

1.3.1 FBO role

FBOs wishing to apply for flexibility in OV attendance need to discuss their eligibility with their FSA ITL in the first instance during SOR meetings. The ITL should then contact the local FVC and inform the FVC of the FBO's request. Any risks identified to the OV not being on site during production must be fully considered by the FBO before agreeing OV flexibility on in their establishment.

1.3.2 FVC role

All establishments within the FVC's span of control must undergo an OV flexibility assessment utilising the outcome of the last completed FBO full audit. For establishments where a flexible attendance arrangement was implemented, this assessment will be used for monitoring purposes (see topic 1.7 on 'Monitoring of establishments with flexible attendance').

FVC should actively look for opportunities to implement flexibility liaising with contractors and local inspection teams to identify opportunities available.

The FVC is responsible for the co-ordination of tasks necessary to implement flexible attendance.

Once informed about FBO's interest in flexible attendance the FVC should make contact with the FBO and explain the process and requirements.

The FVC should agree a date with the FBO, OV and the contract Area Veterinary Manager (AVM) to visit the premises and to carry out the assessment necessary to evaluate suitability of the premises for implementation of the flexible arrangement.

1.3.3 Examples where flexible attendance should be considered

Each establishment is different and opportunities for flexible attendance will vary. There are, however, common aspects that should be considered when looking at the operational pattern, process details and options for reduced level of official controls.

The following operational examples could indicate to the local FSA team and FBOs that there are opportunities for flexible attendance:

- scheduled arrivals of animals allowing for planning of operations and OAs carry out post-mortem inspection
- inspection, for example, the OV can leave early or arrive late depending on the plant production and FBO requirements
- establishments in a local geographical area which may be served by one roving OV (serving multiple premises), with OAs carrying out post-mortem inspection.

1.3.4 General requirements for implementation of flexible attendance

All establishments wishing to implement flexible attendance arrangement must meet the following general requirements:

Compliance history (full audit period utilised)

Implementation of flexible attendance should only be considered in establishments with good compliance history utilising the outcomes from the last completed FBO audit that means:

- 'Good' or 'Generally satisfactory' outcome of the last FSA audit

- any non-compliances raised by the FSA team are promptly resolved by the FBO (no need to routinely escalate to formal enforcement, hygiene improvement notice (HINs), remedial action notice (RANs)
- good welfare standards – no 'critical' welfare non-compliances
- implemented and maintained food safety management system based on HACCP principles (including adequate controls over removal and disposal of SRM)

Throughput / animals slaughtered

The daily species / type of animals slaughtered, the throughput of the establishment and the line speed should not compromise food safety, specifically:

OA should have enough time to inspect all animals and put aside meat with uncommon conditions for OV inspection

FBO should ensure that only young and healthy animals are slaughtered, or adequate arrangement should be in place for slaughter of older animals

FBO should not accept animals originating from farms under movement restrictions due to diseases

FBO should not accept animals from emergency on farm slaughter unless a provision is made for the post-mortem inspection to be carried out by the OV.

Ante-mortem arrangement

Positive ante-mortem release system has to be implemented and maintained to ensure that only animals that have undergone ante-mortem inspection have been slaughtered for human consumption.

Facilities for storage of meat

Adequate facilities have to be in place for storage of meat with uncommon conditions for OV inspection for all species slaughtered.

Ante and post-mortem inspection records (last 3 month period)

FSA ante and post-mortem records for the establishment wishing to implement a flexible attendance arrangement should not indicate frequent and regular findings that would require OV consultation / inspection.

1.3.5 Specific requirements

In addition to the general criteria, the specific requirements applicable to certain types of establishments must be taken into consideration. (See topic 1.4 on 'Specific requirements: Red meat slaughterhouses', topic 1.5 on 'Specific requirements: Game handling establishments' and topic 1.6 'Flexible attendance: Poultry establishments with MHI inspection'.)

1.3.6 Assessment of premises

The FVC should carry out an assessment of each premise in conjunction with the OV and FBO, taking into consideration the operating practices and agreed operating hours, using 'Assessment for OV Flexible Attendance' at Annex 1.

Assessment process steps	
1	FVC agrees a date with the FBO, OV and contractor AVM and visits the premises to carry out the assessment.
2	FVC discusses the outcome of the assessment with a relevant FVL.
3	FVC uploads Annex 1 'Assessment for OV Flexible Attendance' form to the area SharePoint site
4	FVC informs the ITL / Operations Manager (OM) / Head of Operational Delivery (HOD) about the recommendation, in writing.
5	ITL notifies OV, contractor AVM and FBO about the recommendation and agrees SOR.
6	FVC populates the OV Flexibility information specific to the establishment on the K2 system, available at (http://k2smartforms-live.meathygiene.mhs/Runtime/Runtime/Form/SF.OVFlex/).

1.3.7 Daily OV tasks

When assessing the premises, the FVC must be satisfied that the OV will have enough time to carry out the daily OV tasks, which include:

Food chain information – all FCI records provided by the FBO must be assessed by the OV prior to slaughter.

Ante-mortem inspection – all animals slaughtered for human consumption must undergo ante-mortem inspection carried out by the OV less than 24 hours before slaughter.

Welfare checks – the OV should assess the welfare of animals at intake or in the lairage and ensure a system is established to verify welfare up to and including

the stun / stick / bleed process. Daily welfare checks can be carried out by the OA as per the instruction in chapter 2.3 on 'Animal welfare'.

Post-mortem inspection – the OV should carry out the PMI verification check as per the detailed instruction in chapter 2.4 on 'Post-mortem, health and identification marking'. In the case of emergency slaughtered animals, the OV must personally carry out the PMI.

Enforcement – the OV should spend as much time as needed to take an enforcement action (or further investigate) when their daily checks, or checks carried out by other members of the FSA team, indicate that the FBO is not in compliance with relevant requirements of food hygiene law.

Paperwork / records – sufficient time should be provided to the OV to complete all daily paperwork and records, as required by FSA policies and procedures.

1.3.8 Team tasks

Before flexible arrangement is implemented, the FVC and OV must be satisfied that there are adequate and suitably trained staff and FSA procedures that cover:

- PMI – all animals slaughtered for human consumption must be subject to PMI
- SRM removal and handling – the OV is expected to use the 'Risk Based Decision Tool (RBT) for SRM Inspections' on a monthly basis to set the frequency of checks as per chapter 2.7 on 'Specified risk material controls'. Depending on the frequency that was set (daily / every 5 days), the FSA team must carry out all SRM removal, handling and disposal verification checks as per details in chapter 2.7 on 'Specified risk material controls'
- ABPs – FSA team must verify that all ABPs are correctly identified, stained and stored until collection as per the instruction in chapter 2.8 on 'Animal by-products'
- animal identification – daily FSA cattle ID checks must be carried out to the frequency set by the OV (based on FBO's compliance history) as per chapter 2.5 on 'Animal identification', section 4
- sampling – all required sampling takes place and samples are appropriately identified and handled and sent to the appropriate laboratory for testing
- cleaning and disinfection (C and D) checks – team must ensure that C and D checks are carried out as per the frequency set for the plant

- records keeping and data input – a system must be in place to ensure that all records are kept and maintained and all data is correctly and timely inputted into relevant systems.

1.3.9 Hours of attendance by OV

Due to the reactive nature of the OV role, the times set out by the FVC in the flexibility assessment are only indicative. The OV must have the time available to respond to issues as they arise. Certain issues may take considerable time to address, for example, gathering evidence, enforcement, working with other enforcement agencies, food complaints.

1.3.10 Appeals

Appeals by the FBO against the decision of the FVC should be made through the Statement of Resources appeal system.

1.4 Specific requirements: red meat slaughterhouses

1.4.1 Flexible OV attendance at red meat slaughterhouses

Abnormal meat is product with pathological changes not routinely seen at PMI. Where the changes may indicate a notifiable disease, veterinary advice must be sought immediately. Arrangements must be in place for the OV to examine uncommon abnormal meat identified at PMI, including where slaughter does not take place on sequential days. More about abnormal common/uncommon meat can be found in chapter 2.4 on ‘PM, health and identification marking’.

1.4.2 OV attendance at post-mortem inspection in red meat premises

The activities and circumstances which require OV attendance at post-mortem inspection in red meat premises are:

- where facilities are insufficient to hold carcases and offal with uncommon conditions for OV inspection
- for post-mortem inspection of:
  - animals that have undergone emergency slaughter

  - animals that are suspected of having a disease or condition that may adversely affect human health or animal health
  - cattle from herds not declared officially free of TB
  - cattle, sheep and goats from herds that have not been declared officially free of brucellosis (BR)
- in the case of an outbreak of a notifiable animal disease to which the animals concerned are susceptible and which come from the affected region
- to confirm identity and verify correct disposal of carcases when a non-negative BSE test result is received

Reference: (EU) 2019/624, Article 8.

1.4.3 Red meat premises with cold inspection

The OV should make scheduled PMI visits to check on the accuracy of the PMI by the MHI at a frequency outlined in the instructions for PMI in chapter 2.4 on 'Post-mortem, health and identification marking'.

1.5 Specific requirements game handling establishments

1.5.1 Flexible OV attendance at game handling establishments

Game Handling Establishments are eligible to be considered for flexible OV attendance during PMI. Refer to previous topic 1.2 on 'Flexible attendance: General issues' and the previous sub-topic 1.3.4 on 'General requirements for implementation of flexible attendance'.

Where inspections are carried out by a MHI, the OV should visit the premises at least once every month. If the establishment is conditionally approved the OV will be required to visit the plant at least once every 5 operational days until full approval is granted.

1.5.2 OV attendance at post-mortem inspection in game handling establishments

The activities and circumstances which require OV attendance at PMI in game handling establishments are:

- where facilities are insufficient to hold all carcases and offal with uncommon abnormalities and OV inspection (only uncommon abnormal findings need be held for OV inspection not common PM findings)
- for PMI of animals suspected of having a disease or condition that may adversely affect human health or animal health
- in the case of an outbreak of a notifiable animal disease to which the animals concerned are susceptible and which come from the affected region

1.6 Flexible attendance: Poultry establishments with MHI inspection

1.6.1 Flexible OV attendance at Poultry establishments with MHI PM inspection

Reference: (EU) 2017/625 Article 18(3)

Poultry slaughterhouses are eligible to be considered for flexible OV attendance during post-mortem inspection. Refer to previous topic on 'Flexible attendance: General issues' and the previous sub-topic 1.3.4 on 'General requirements for implementation of flexible attendance'.

The MHI may discard abnormal poultry meat. Uncommon abnormal meat does not need to be systematically inspected by the OV; however:

- the OV must have time to complete their specific inspection duties to inspect the viscera and body cavities of a representative sample of birds each day (statistically a minimum of 300 birds per day)
- the OV must have time to undertake a detailed inspection of a random sample of rejected carcases / parts of carcases from each batch of birds

1.6.2 OV attendance at PMI in poultry slaughterhouses

The activities and circumstances which require OV attendance at PMI in poultry slaughterhouses are:

- for PMI of animals suspected of having a disease or condition that may adversely affect human health or animal health
- in the case of an outbreak of a notifiable animal disease to which the animals concerned are susceptible and which come from the affected region

1.6.3 Poultry premises with delayed evisceration

The OV / MHI / plant inspection assistant (PIA) shall inspect all carcases and viscera following delayed evisceration. Where PIAs are utilised the OV must attend at all times during the process.

Where the MHIs are carrying out PMI the FVC shall establish an OV site visit routine to verify operations dependant on throughput and general assessment.

The FBO must contact the service delivery manager / OV at least 24 hours in advance so that the FSA can arrange for adequate supervision levels.

1.7 Monitoring establishments with flexible attendance

1.7.1 Monitoring

FBOs in establishments with flexible attendance arrangement in place should have their performance regularly monitored. For that purpose the FSA will use as indicators the information gathered during the official control tasks (for example, audit outcomes and enforcement action records).

FBOs must be able to demonstrate that all public health, animal health and welfare risks are controlled and that the flexible attendance does not create any additional risks associated with their process.

As part of FSA monitoring, the FVC is required to carry out two types of assessments:

- Post implementation assessment – to be carried out four weeks after implementation of flexible attendance; following this assessment, the FVC must complete the form ‘Post implementation assessment’ at Annex 2 and upload it to the local SharePoint site.
- Triggered assessment – to be carried out by the FVC, if there is evidence that an establishment no longer fulfils the criteria to maintain a flexible attendance arrangement (based on audit outcome, compliance history or changes to operational procedures); the FVC should complete ‘Assessment for OV Flexible Attendance’ at Annex 1 and upload it to the local SharePoint site. K2 should be updated for central record purposes.

Monitoring and triggers for review are as follows:

- Audit outcome (Improvement Necessary / Urgent Improvement Necessary) – The FVC should monitor FSA audit data to assess performance of establishments. Plants that have previously been assessed as suitable for OV flexibilities falling into Improvement Necessary / Urgent Improvement Necessary FBO audit outcome categories must have OV flexibilities reviewed by the FVC. Where Urgent Improvement Necessary / Improvement Necessary audit score is a result of ongoing enforcement and open non-compliances, the OV flexibility should be removed. However, if the non-compliances are historic and closed, the local FSA team (FVC / FVL) should decide whether the OV flexibility should be removed / reduced or not.
- Compliance of FBO – Establishments with flexible attendance in place but where hygiene standards have dropped (formal notices) or critical welfare NCs have been found should have the flexibility assessment arrangement reviewed/removed. FVC and contract OV/AVM communications should be established locally to ensure prompt action in these cases.
- Changes to operational procedures – level of flexibility might need to be assessed if FBO or OV notifies the FVC of changes to operational procedures at the establishment (for example, changes in pattern, animal delivery, type of animals processed). FVC and contract OV/AVM communications should be established locally to ensure prompt action in these cases.

1.7.2 Outcome of FVC assessments

Following the completion of any assessment, the FVC should confirm to the ITL if the levels of attendance can be maintained (or further decreased).

In cases where the FVC finds sufficient evidence that criteria for flexible attendance are no longer met, they can recommend an increase in the level of attendance or remove the flexible attendance arrangement as detailed in the topic 1.8 on ‘Review / Removal of flexible attendance’.

1.7.3 Assessment of performance of official auxiliaries

The performance of OA deployed in establishments with a flexible attendance arrangement in place should be regularly assessed by the OV as follows:

- PMI verification checks which will allow OVs to monitor PM performance and accuracy of judgement

- OV should verify on a monthly basis that PM records are accurate and all procedures are followed. Records of that verification should be kept in the FSA Day Book

1.8 Review / removal of flexible attendance

1.8.1 Review

The flexible attendance arrangement is not permanent and can be reviewed / removed. If the FVC finds during monitoring sufficient evidence that requirements for flexible attendance are no longer met, the FVC can increase the level of attendance (including complete removal of flexible attendance arrangements). In those cases, the FVC should follow the process steps below.

Note: The OV hours will be reviewed at each Statement of Resources meeting.

1.8.2 Process steps

The table below details process steps that should be followed during the review of flexible attendance arrangement by the FVC:

Process steps	
1	Outcome of FVC assessment indicates that the requirements for flexible attendance are not met.
2	FVC discusses the outcome of the visit and evidence gathered with a relevant FVL.
3	FVC informs the ITL / OM / HOD about the recommendation to increase attendance, in writing.
4	ITL notifies FBO about the recommendation and agrees SOR.
5	FVC populates the OV flexibility information specific to the establishment on the K2 system.

1.8.3 Appeals

Appeals by the FBO against the decision of the FVC should be made through the Statement of Resources appeal system.

1.9 FSA role

1.9.1 Field Veterinary Co-ordinator

FVCs shall assess premises for OV flexibility communicating findings formally via required documentation and liaise appropriately with plant OVs, FSA ITLs and contractors to implement changes to the operational requirements. FVCs are responsible for ensuring that team members know how to contact them by having local procedures / arrangements in place to deal with routine and non-routine issues in the OVs absence.

1.9.2 Field Veterinary Leader / Heads of Operational Delivery

FVLs will consider the decisions made at premises within the different clusters in their area for consistency of application.

1.9.3 Service Delivery Managers

The ITL must assess the risks to the delivery of official controls and ensure that non-veterinary staff are capable of fulfilling the supervisory role in the absence of the OV at individual premises. ITLs shall amend SORs following OV flexibility decisions. The business comments section of the SOR must capture the agreed flexibility applied.

1.9.4 Regulatory Delivery and Operational Transformation (RDOT) Division

Drawing on information recorded centrally, the RDOT Division at FSA will maintain an accurate record of premises where flexible arrangements are in place.

1.9.5 OV contract supplier role

OV contract suppliers will identify OV flexibility opportunities and liaise with the FSA FVC to implement opportunities ensuring the OV attendance is flexible to meet the needs at individual premises.

2. PIA System

2.1 Introduction

2.2 Legislation

2.3 Assessment arrangements

2.4 Roles and responsibilities

2.5 Establishment permit assessment

2.6 Establishment monitoring assessment

2.7 Withdrawal of establishment permit

2.8 Hybrid PIA / FSA systems

2.9 TUPE considerations

2.10 Assessment process for poultry establishments wishing to move to PIA system

2.11 Assessment process for poultry establishments already using PIAs

2.1 Introduction

This section outlines a standardised process to assess suitability of poultry slaughterhouses to use Poultry Inspection Assistants (PIAs) to carry out official control duties.

2.2 Legislation

Regulation 2017/625 Article 18(3) permits the use of slaughterhouse staff in establishments slaughtering poultry or lagomorphs to assist in the performance of tasks relating to official controls on the basis of a risk analysis and on condition that staff:

- act independently from the production staff of the slaughterhouse;
- have undergone appropriate training to carry out these tasks; and
- carry out these tasks in the presence and following the instructions of the official veterinarian or of the official auxiliary.

Slaughterhouse staff shall comply with the minimum training requirements set out in Chapter II of Annex II Regulation (EU) 2019/624 to the extent relevant for their assistance tasks.

2.3 Assessment arrangements

The FSA is responsible for carrying out a risk assessment on those premises wishing to implement a PIA system or to move from a MHI to a PIA system to confirm that they have a robust food safety management system in place. This is done through the “Establishment Permit Assessment” which is separate to the approval process.

The “Establishment Permit Assessment” will be carried out at each specific plant requesting the use of PIAs. There are three different scenarios detailed below:

1. For **plants using MHIs moving to a PIA system**, the risk analysis is based in past FBO performance, so provided there is evidence of a sustained and effective food safety management system based on HACCP principles in place for at least six months, a PIA system can be implemented after the assessment as per MOC instructions has been completed.

If an FBO has been compliant for the previous 6 months and has sufficient number of PIAs trained and ready to operate, the implementation of the PIA system can be done without any delay (see point 2.9).

2. For an **approved establishment already using PIAs moving into new premises or changing ownership**, the FSA can decide, on a case by case basis, if the timings to permit the introduction of the PIA system in the new establishment can be reduced. That can be done for instance by carrying out the assessment of the PIA system in the previous establishment, by temporarily supervising the PIA procedures in the new site with a small team of inspectors, or a mixture of measures appropriate to each case.

In this second scenario, the PIA implementation process can take just a few days, if the FBO had a history of compliance in the previous site and the PIA team is ready to move in.

3. For a **newly approved establishment with no previous history of PIA usage**, the risk analysis considers that the FBO shall provide evidence of a sustained and effective food safety management system based on HACCP principles which in this case will be assessed throughout the approval process, which in normal circumstances will last between 3 and 6 months. Once a full approval is granted, the FBO can implement a PIA system, provided it meets the MOC assessment criteria.

In this last scenario, the PIA implementation process can take between 3 and 6 months, which should allow the FBO Food Safety Management System to be fully implemented, and to train and develop the PIA pool.

Following the implementation of the PIA system, in order to ensure a consistent approach, assessments must also be completed regularly on the establishment's suitability to continue with PIA systems. This is known as the "Establishment Monitoring Assessment". This assessment should be based on the effectiveness of the implementation of the FBO food safety management systems, PIA performance and capability of the PIAs to address hygienic and process issues. This interim monitoring assessment will take place at least once between full audits and/or when the competent authority considers necessary.

2.4 Roles and responsibilities

2.4.1 Head of Field Operations / Operations Head Veterinarian

The Head of Field Operations is the owner of this process with the Operational Head Veterinarian having the ultimate responsibility for all technical aspects.

2.4.2 ITL

The decision making process will take place at a cluster / business area level. ITLs, with the ultimate support of their HOD, will manage operational implications and will determine timescales for introduction of any changes, in consultation with the FBO and FVC / FVL. Human resources colleagues will provide support on staffing issues.

2.4.3 FVC

FVCs will be required to carry out necessary technical assessments in their clusters, on behalf of the HOD.

The FVC will use information provided by the OV and local FSA Team on the day-to-day running of the business by the FBO when making their assessment. They should discuss any resource implications with the ITL.

2.4.4 FVL

Where further assurance or guidance is required (for example, where the FBO does not agree with the FVC decision), an FVL may provide additional technical advice.

The FVL may also carry out the establishment assessments or provide advice to the ITL / FVC / HOD on the best course of action if technical issues arise.

2.4.5 Approvals and registrations team

The Approvals and Registrations Team will be responsible for the administration of the establishment permit process. They will maintain copies of the permit visit reports and keep records of all assessed establishments centrally. Following a successful establishment assessment, a letter will be sent from the Approvals and Registrations Team to the FBO confirming the establishment's PIA permit.

They will also be responsible for coordinating the withdrawal of the establishment's PIA permit if required.

2.4.6 Central Support Unit in York (CSU)

CSU will be responsible for keeping records of the establishment monitoring assessment visits and linking these to the audit frequency. A monitoring visit will be carried out between full audits or at any other time if the FVL/FVC considers it is necessary.

In addition, CSU will be responsible for the administration of the PIA authorisation and withdrawal processes.

2.4.7 OV

The OV is responsible for PIA assessments and constant monitoring of their performance.

2.5 Establishment permit assessment

2.5.1 Notify ITL

An FBO should make a request to transfer to a PIA system to the ITL, who should inform the FVC / FVL at the earliest opportunity. The ITL will need to consider staffing implications and impact on existing FSA staffing at the premises.

2.5.2 FVC / FVL action

The FVC must visit the establishment and complete relevant parts of the 'Assessment of PIA systems in poultry slaughterhouses' PIA 4 form (Annex 10). A technical decision is required on whether the necessary systems are in place and PIAs are trained as required (see Chapter 10 Section 3 on PIA training). This assessment should be completed in accordance with deadlines established by the FVC (FVL) and ITL (in consultation with the FBO).

2.5.3 Suitable outcome

In this instance the ITL and FVC / FVL will discuss time-scales and operational management of the process with the FBO.

The FVC / FVL should email a copy of the completed PIA 4 form to the Approvals and Registrations Team. The team should update the central record of assessed establishments, send an authorisation letter to the FBO and notify CSU of the outcome.

2.5.4 Unsuitable outcome

The FVC / FVL should share their findings with the FBO and ITL and include the reasons behind their decision in writing. An action plan should be provided by the FVC / FVL of the areas that need improvement with a proposed timescale. The FVC / FVL should monitor progress towards addressing the necessary requirements. Once corrective actions are implemented the FVC / FVL must carry out a further assessment within the proposed timescales, or earlier upon the request of the FBO.

After the further assessment has been completed, the FVC / FVL should notify the FBO and ITL of the outcome and email a copy of the completed PIA 4 form to the Approvals and Registrations Team for information and filing. The Approvals and

Registrations Team should update the central record of assessed establishments and send a copy of the report to the FBO.

2.5.5 Appealing the outcome of a refused establishment permit assessment

Where the FBO does not agree with the FVC / FVL decision, they may appeal to the Operations Head Veterinarian. The Operations Head Veterinarian is responsible for appointing an FVL / FVC from a different area as an Investigating Officer.

The Investigating Officer (IO) will have 14 days to gather the required evidence, conduct the investigation and submit a report with findings and conclusions to the Operations Head Veterinarian.

The Investigating Officer might consider visiting the premises before concluding the report.

Upon completion of the investigation the Operations Head Veterinarian will advise the FBO of the outcome of the appeal in writing.

2.6 Establishment monitoring assessment

2.6.1 Monitoring

All establishments permitted to use PIA system shall undergo a regular monitoring assessment to determine if the food safety management systems continue to be effectively managed by the FBO.

The frequency of the monitoring assessment will be risk based and correlated with the audit frequency of the establishment.

At least one plant assessment should be carried out by FVC / FVL between full FBO audits. The frequency of the monitoring assessments is based on the current audit system outcome; establishments with the lowest audit score should be assessed at least once every two months and the best performing plants once every 18 months.

Audit outcome	Full audit frequency
Good	18 months
Generally satisfactory	12 months
Improvement necessary	3 months
Urgent Improvement necessary	2 months

An additional establishment monitoring assessment can be triggered, regardless of the audit frequency, if serious concerns are raised by FSA field team regarding poor level of compliance (for example, sudden decline in hygiene standards, insufficient staffing levels, serious HACCP failures).

For establishments awarded poor audit scores ('Improvement Necessary' or 'Urgent Improvement Necessary') an assessment should be carried out as soon as possible from the date of the audit report being sent to FBO.

During the assessment the FVC / FVL should complete relevant parts of the establishment assessment PIA 4 form.

Where the FVC / FVL already has a good knowledge of the establishment, it may be possible to complete the monitoring assessment as a desk-based exercise, in consultation with the establishment OV. Establishments falling within the Improvement Necessary / Urgent Improvement Necessary categories should be visited.

2.6.2 Suitable outcome

The establishment is considered suitable to continue with its PIA system. In this instance, the FVC / FVL will complete the establishment assessment PIA 4 form and discuss their findings and decision with the FBO, also informing the ITL of the outcome. A copy of the PIA 4 form should be sent to CSU.

2.6.3 Minor deficiencies outcome

The establishment has minor deficiencies that must be addressed to allow the FBO to continue using PIA systems. The FVC / FVL should advise the FBO in writing on corrective actions that are considered necessary to ensure that the PIA inspection system can continue. The FVC / FVL should also provide a reasonable time-scale for the completion of such actions.

In conjunction with the establishment OV, the FVC / FVL will monitor progress to ensure that the identified deficiencies are addressed. The FVC / FVL should use their professional judgement to decide if a further establishment visit is necessary. A copy of the PIA 4 form should be sent to the CSU.

2.6.4 Major deficiencies outcome

The establishment has major deficiencies that must be corrected to allow the FBO to continue using PIA systems. Where there are major deficiencies – such as serious or multiple hygiene breaches, poorly implemented / maintained food safety management system, PIAs failing to perform their duties to the required standard and / or allowing unhygienic / unfit product to enter into the food chain - the FVC / FVL should discuss findings with the FBO and ITL.

A support MHI may be introduced onsite as an interim measure until the necessary deficiencies are addressed. This will need to be within a short timescale, depending on the nature of the risks.

The FVC / FVL should provide the FBO with a written summary of identified deficiencies and a clear timeframe to rectify them.

In conjunction with the slaughterhouse OV, the FVC / FVL should monitor the establishment to ensure that the identified deficiencies are addressed.

The FVC / FVL should carry out an additional monitoring assessment within an agreed timeframe. In this assessment, the FVC / FVL must consider whether:

- the FBO has remedied the deficiencies;
- an extension to the MHI support role is needed; or
- a full reversion to a MHI system is necessary.

The ITL will need to consider operational implications and should liaise with their HOD and FVC / FVL as appropriate. A copy of the PIA 4 form should be emailed to the CSU.

Note: Reverting back to a MHI system should only happen as a last resort, where it is clear that arrangements are unsatisfactory and that the FBO is not taking appropriate responsibility to implement corrective actions and ensure that public health is safeguarded.

2.7 Withdrawal of establishment PIA permit

Where very serious deficiencies are identified during the routine monitoring assessment visit the FSA local management might consider increasing the level of official controls in the premises and deployment of additional FSA staff.

1. FVC / FVL communicates to the FBO the deficiencies identified during the monitoring assessment and provides a timeframe for rectification. All

identified issues and non-compliances have to be communicated to the local FSA management (ITL, HOD) at the same time.

2. FVC / FVL is required to reassess the establishment within the agreed timeframe to evaluate improvement.
3. FVC / FVL must communicate the outcome of the second assessment to the FBO and confirm the suitability of the PIA system or recommend to the Operations Head Veterinarian a withdrawal of establishment PIA authorisation if the observed improvement was not satisfactory.
4. Findings of the FVC / FVL reassessment and recommendation made by FVC / FVL must be discussed within the local FSA team. Sufficient evidence supporting the recommendation should be presented to the Operations Head Veterinarian.
5. Operations Head Veterinarian assesses the presented evidence and advises the FBO and the local FSA team in writing of his decision.

2.8 Hybrid PIA / FSA systems

Hybrid PIA / FSA systems may be acceptable under exceptional circumstances, for example, in larger industrial slaughterhouses where MHIs carry out online inspection duties at certain inspection points, and others are manned by PIAs. Typically, though, an FBO would be expected to have an OV only; an OV plus MHI team or OV plus PIA(s) model in place.

As described above, use of support MHIs may also be accepted as an interim measure at slaughterhouses using PIAs where it is judged that premises have major measurable deficiencies which must be corrected to allow the FBO to continue using PIA systems.

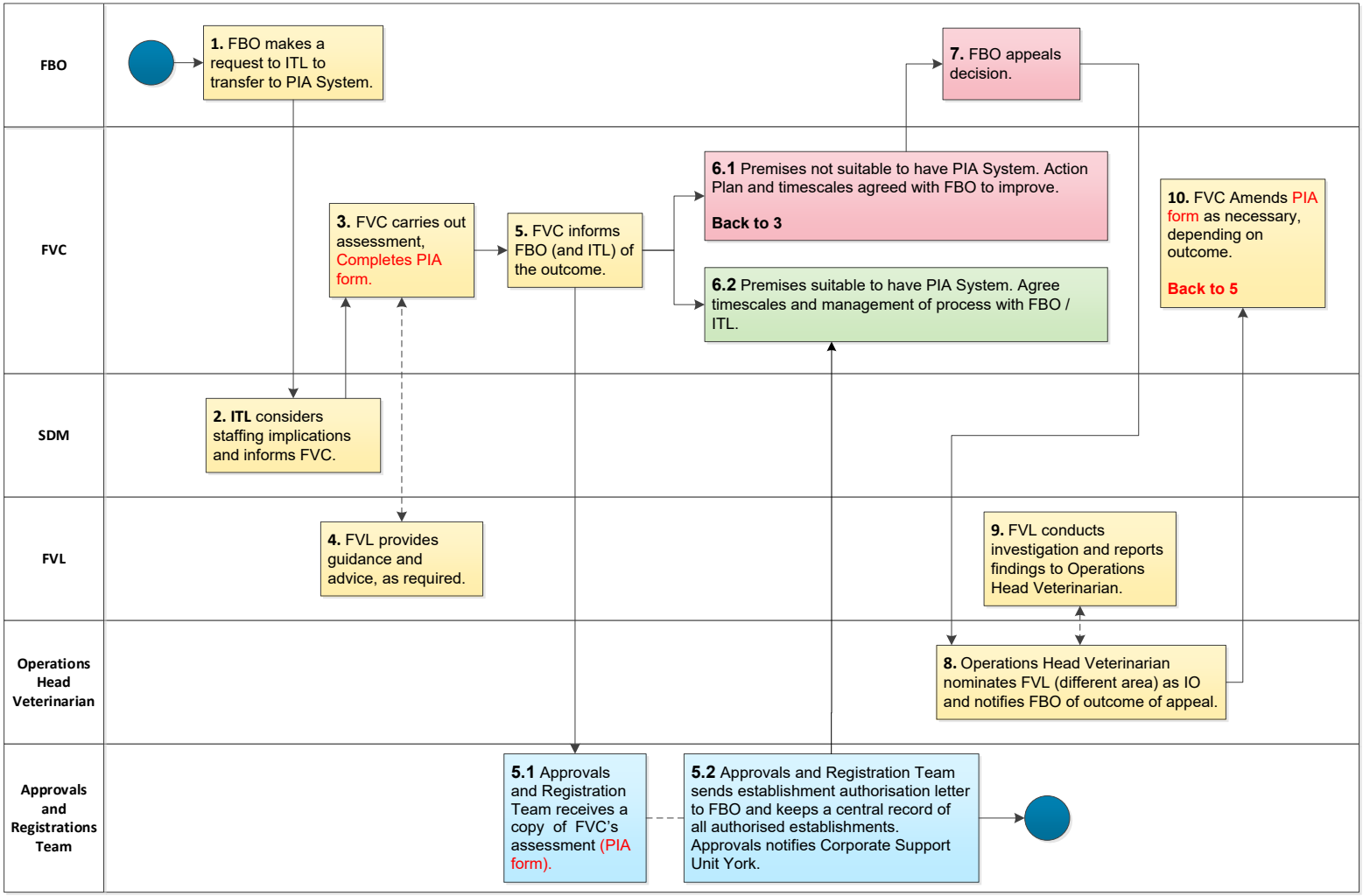
2.9 TUPE considerations

The Transfer of Undertakings (Protection of Employment) (TUPE) 2006 Regulations preserve employees' terms and conditions when a business or undertaking, or part of one, is transferred to a new employer. The FSA has received legal advice that the transfer from FSA MHI to PIA systems (or reverse) could be challenged under the TUPE 2006 Regulations.

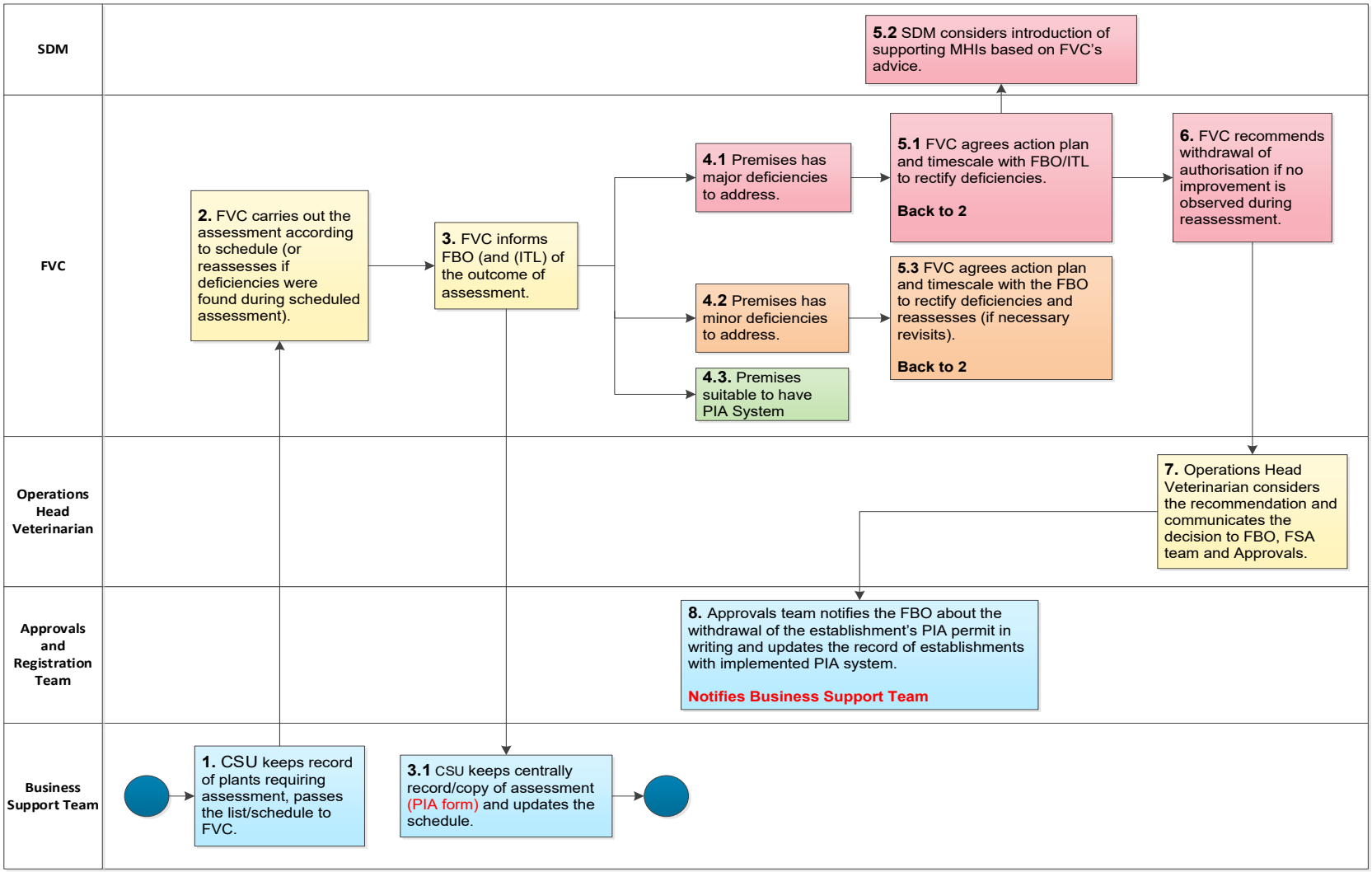
ITLs must be aware of possible implications of TUPE when discussing staffing options with FBOs of poultry slaughterhouses and should consult with Human Resources colleagues in this event. Opportunities for redeployment within the FSA will still need to be considered, in the normal way.

It remains a commercial decision for the FBO in determining whether to move to a PIA system. FBOs wishing to implement a PIA system must seek their own legal advice on the impact of TUPE.

2.10 Assessment process for poultry establishments wishing to move to PIA system



2.11 Assessment process for poultry establishments already using PIAs



3. Annexes

Annex 1	OV Flexible Attendance – Assessment
Annex 2	OV Flexible Attendance – Post implementation assessment
Annex 3	PIA – Assessment of PIA systems in poultry slaughterhouses (PIA 4)
Annex 4	Cold Inspection Guidance