Food Safety Situation in Ireland
Overview of the Directorate for Health and Food Audits and Analysis, DG SANTE

Study for the ENVI Committee

EN 2018
Abstract

This study was prepared for Policy Department A at the request of the Environmental, Public Health and Food Safety (ENVI) Committee, and updates the earlier 2016 briefing. It provides an overview of the food safety situation in Ireland. It outlines the Irish food and drink industry, the structure and organisation of the food safety and control system involved in food safety in Ireland and a description of current food safety issues in Ireland. An overview of the structure and competencies of the Directorate for Health and Food Audits and Analysis, DG SANTE (formerly European Food and Veterinary Office) based in Ireland is also provided.
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LIST OF ABBREVIATIONS

CA Competent Authority
CVRL Central Veterinary Research Laboratory
DAFM Department of Agriculture, Food and Marine (previously DAFF)
DG SANTE Directorate General for Health and Food Safety
DOH Department of Health
EPA-ORP Environmental Protection Agency – Office of Radiological Protection
FFN Food Fraud Network
FSAI Food Safety Authority of Ireland
HSE Health and Safety Executive
LAVS Local Authority Veterinary Service
MI Marine Institute
NRL National Reference Laboratory
NSAI National Standards Authority of Ireland
OFML Official Food Microbiology Laboratory
PAL Public Analyst Laboratory
RASFF Rapid Alert System for Food and Feed
SFPA Sea Fish Protection Authority
VPH Veterinary Public Health
1. EXECUTIVE SUMMARY

This report is based upon, and updates, the earlier study conducted in 2016.

Food safety situation in Ireland

Ireland joined the European Union in 1973 and is one of its smaller members having a population of 4.8 million.

Although the non-food industry and service sectors have grown in recent years, agriculture and the food and drink industry form a significant part of the Irish economy. The agri-food industry provides approximately 173,000 jobs and has a turnover of €24 billion. Ireland is self-sufficient for many food products. Agri-foods exports were valued at €12.6 billion in 2017 with most products destined for the UK market and the rest of Europe. The main products exported are dairy products and ingredients, beef and beverages. The agri-food and fisheries market is envisaged as a major area of growth for the future.

Ireland is the largest net exporter of dairy ingredients, beef and lamb in Europe, exporting over 80% of its dairy and beef production.

The principal organisations responsible for developing food policy and legislation are the Department of Agriculture, Food and Marine (DAFM) and the Department of Health (DOH). The Food Safety Authority of Ireland (FSAI) assists them in this role and provides scientific and technical advice. DAFM is also responsible for the development of policy and legislation in relation to feed, plant health and animal and health and welfare and is also the relevant competent authority responsible for official control in these areas.

The FSAI is responsible for enforcement which is undertaken via service contracts with a number of agencies, including DAFM which also acts as a competent authority in the food sector. Commercial contracts stipulate the services to be provided, and the required standards, frequency and reporting structures. A significant number of agencies are involved and the control system appears complex. Nevertheless control and responsibility is organised to avoid duplication and a cross-agency working group ensures co-ordination and that there are no gaps or overlaps in responsibility and enforcement.

The FSAI is also the national contact point for the European Rapid Alert System for Food and Feed (RASFF). Subsequent to the horse meat incident the FSAI also established, and chairs, a National Food Fraud Task Force and is a liaison office for the European Food Fraud Network.

Directorate on Health and Food Audits and Analysis

The Directorate on Health and Food Audits and Analysis works within the European Commission’s Directorate-General for Health and Food Safety (DG SANTE) and is based in Grange, County Meath, Ireland.

The Directorate on Health and Food Audits and analysis (DG SANTE) undertakes missions to Member States, acceding and candidate countries and other third countries wanting to export goods to the EU to audit their controls systems and structures to ensure that EU legislation on food safety, animal health, plant heath and animal welfare is properly implemented and enforced. As such they undertake detailed visits (missions) to the countries concerned during which meetings are held with the relevant competent authorities and other relevant organisations and visits are undertaken to appropriate food business operators and processors. The programme of visits is developed each year in line with key Commission strategic priorities and after consideration of risk and other factors. Each visit report sets out the findings, identifies any shortcomings and includes
recommendations for improvements. The competent authorities are required to present an action plan to address the recommendations. Follow up reviews are undertaken to ensure that these actions are taken. In the case of persistent failure to undertake action to address the recommendations the European Commission can resort to legal action such as infringement proceedings or reasoned opinions via the European Court of Justice. Where an immediate threat to the consumer, animal or plant health is identified emergency measures, including legal action to prevent trade or imports of animals, plants or their products, are taken.

**Food safety incidents**

Although there are EU and Member State control systems in place food incidents do occur due to various reasons. These can be local, national or affect the whole of the EU. In 2013 an incident which affected the whole of the EU was that of Equine DNA identified in beef products (as well as traces of porcine DNA) identified in Ireland. This investigation resulted in the formation of the Food Fraud Task Force and an awareness of the issue of food fraud and implications for food safety at both EU and national level. In addition however other aspects of food safety such as foodborne illness, alerts and recalls continue to require monitoring and investigation. Antimicrobial resistance has also been identified as a potential food safety and human and animal health concern and steps are being taken to address this.

**Conclusions**

Ireland has a well established food safety control system where the responsibilities are defined and organised to avoid duplication or gaps.

The Directorate on Health and Food Audits and Analysis undertakes missions to ensure that EU legislation on food safety; animal health and welfare and plant health are being implemented and enforced. Their reports provide meaningful, independent information on the national controls systems. They also inform the development of legislation and controls. Recent Directorate on Health and Food Audits and Analysis reports have concluded that Ireland has a well developed and structured control system in place in relation to the safety of food. Where Directorate on Health and Food Audits and analysis reports have highlighted various areas requiring attention the Irish competent authorities have responded accordingly.
2. INTRODUCTION

This study on food safety in Ireland has been prepared for Policy Department A at the request of the Environment, Public Health and Food Safety Committee (ENVI) in the context of a Delegation to Ireland on 4 - 6 April 2018. It reviews and updates the previous study of 2016.

2.1. Aim

This report provides an update of the 2016 summary of Ireland’s food and drink industry which incorporated an overview of the food safety and control system in Ireland and outlines the structure and competencies of the Directorate for Health and Food Audits and Analysis, DG SANTE (previously the European Food and Veterinary Office (FVO)). This report identifies the main developments since that time on food safety in Ireland and in particular any changes to the structure of the food safety and control system in Ireland and on Ireland’s food production and exports, the changes made to the FVO (now the Directorate for Health and Food Audits and Analysis, DG SANTE), and concerning recent food safety issues in the EU and in Ireland. Associated references have also been updated as applicable.

2.2. Method

2.2.1. Sources of information:

The websites and official publications of the relevant regulatory and other authorities in Ireland and of DG SANTE were examined. Ireland has been subject to seven Directorate for Health and Food Audits and Analysis, DG SANTE audits from 2016 to date (six in 2016 and one in 2017 where reports are available), which have also been considered. Four audits are due to take place in 2018.

2.3. Map of Ireland

Map 1: Map of Ireland

Source: CIA World Fact Book, Ireland 30 January 2018
3. IRELAND, FOOD PRODUCTION AND EXPORTS

KEY FINDINGS

- Ireland has a population of 4.8 million and is one of the smaller countries in the EU;
- The agri-food sector provides 173,000 jobs (2016); 8.6% of total employment and has a turnover of €24 billion;
- In 2017 the export of Irish food and drink recorded its eighth year of growth, being valued at €12.6 billion and exporting to 180 countries;
- The major destination for exports in 2017 were the UK (35% - €4.5 billion), other EU markets (33% - €4.1 billion) and international markets 32% (€4 billion) – representing a slight decrease to the UK;
- The UK remains Ireland’s main export market and source of imports;
- Dairy products and ingredients (30%), Beef (21%) and Beverages (14%) represent the major products exported;
- The agri-foods sector has been identified as an area for future economic growth, in diversified markets but faces various challenges.

This chapter provides general information on Ireland and the Irish food industry.

With a population of approximately 4.8 million (April 2017) (Central Office of Statistics) Ireland has one of the smallest populations in Western Europe. The Irish economy has undergone a rapid recovery following the earlier recession when in 2010, like a number of countries in the European Union (EU), Ireland was granted financial support from the European Union’s European Financial Stability Fund. Since then Ireland has been subject to post-programme surveillance (PPS) which continues until at least 75% of the financial assistance received has been repaid (It is anticipated PPS will remain until at least 2030). The latest report (European Commission, 2017a) comments that the growth of the domestic economy remains robust (with growth reaching all sectors of the economy and growing more rapidly than expected in 2016) but that whilst the outlook for the Irish economy ‘remains bright’ there are significant external risks. These include uncertainty around the final outcome of the negotiations between the UK and the EU under Article 50 of the Treaty on European Union and also possible future changes to international tax and trade policies. (European Commission, 2017b). Ireland’s overall competitiveness is also reported to continue to improve (Bord Bia (the Irish Food Board), 2016) and there have been eight years of consecutive growth (Bord Bia, 2018). Challenges to the agri-food sector however also include commodity price volatility and exchange rate fluctuations (DAFM 2017a).

The Food and Drink Ireland (FDI) indicates that the manufacture of food and drink products is Ireland’s most important indigenous industry.

In 2016 approximately 173,000 jobs (8.6% of total employment) were linked to the agri-food sector (predominantly in agriculture, forestry and fishing (65%); food (30%) and beverages 3% (DAFM, 2018a).

Ireland has a high level of self-sufficiency with the majority (71%) of produce to Ireland’s €14bn domestic grocery and food service sector being supplied by Irish companies. In addition, 51% of services purchased are sourced in Ireland. Ireland is the largest net
exporter of dairy ingredients, beef and lamb in Europe and is the largest exporter in Europe of powdered infant formula. Ireland exports over 80% of its dairy and beef production (FDI, 2018).

The agri-food sector (Agriculture, Fisheries and Forestry) represented 7.8% of Modified Gross National Income (GNI); 8.6% of employment and 10.3% of merchandise exports (primary unprocessed products, food and beverages) (DAFM, 2018a).

There are approximately 139,600 farms in Ireland with an average size of 32.5 hectares per holding (DAFM, 2018a) although both show a slight decline on previous years. The land area of Ireland is 6.9 million hectares (2014) of which 4.4 million hectares is used for agriculture. 80% of the agricultural area is devoted to pasture, hay and grass silage, 12% to rough grazing and 8% to crop production (predominantly barley). One problem which has been identified previously and remains as such, which may affect continuity and the skill / knowledge base, however is that over 50% of family farm holders are aged over 55 whilst 5.9% were less than 35 (with the average age being 57.5) (DAFM, 2018a).

The agri-food sector accounted for 10.3% (€12.2 billion) of total exports in 2016 and 11.3% (€8.1 billion) of total imports. Agri-food exports have grown by 56% between 2009 – 2016 from €7.8 billion to €12.2 billion (DAFM, 2018a). It is estimated that this growth continued into 2017 and that the value of food and drink exports in 2017 increased by 13% to €12.6 billion.

The major destination of exports did not alter significantly in 2017 although there were slight changes: the UK (37%) (Ireland is the UK’s largest supplier of food and drink), followed by the rest of Europe (32%) and third countries (31%). This represents a slight decrease to the UK and increase to other EU countries but mostly to third countries. This reflects Bord Bia’s Diversification Strategy and the emergence of newer markets (Middle East, Asia and Africa where sales grew by 30% and United States where sales reached €1 billion for the first time) for Irish food and drink (Bord Bia 2018).

The dairy sector (particularly butter and powders) showed the strongest performance in export growth in 2017 (approximately one third of the total) followed by seafood, pigmeat, sheepmeat and live animals. Edible horticulture, beef, poultry and prepared foods achieved lower levels of growth in relative terms. Whilst pigmeat and beverages are reported to have good growth potential, edible horticulture and prepared foods are subject to currency exposure and pressure from UK competitors and retailers (Bord Bia 2018).

**Figure 1: Agri-food exports by product type 2016**

![Pie chart showing percentage of agri-food exports by product type in 2016](image)

*Source: Factsheet on Irish Agriculture DAFM, 2018a*
Table 1: Overall export performance 2016 vs 2017 (€m) per food sector

<table>
<thead>
<tr>
<th>Commodity</th>
<th>2016</th>
<th>2017(e)</th>
<th>% change</th>
<th>Main export markets</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dairy</td>
<td>3,368</td>
<td>4,023</td>
<td>19</td>
<td>UK, China, Netherlands, Germany, United States.</td>
</tr>
<tr>
<td>Beef (incl offal)</td>
<td>2,370</td>
<td>2,496</td>
<td>5</td>
<td>UK (51%)</td>
</tr>
<tr>
<td>Prepared Foods</td>
<td>1,913</td>
<td>2,243</td>
<td>17</td>
<td>UK, China, the Netherlands, Germany, United States</td>
</tr>
<tr>
<td>Beverages</td>
<td>1,391</td>
<td>1,497</td>
<td>8</td>
<td>United States, UK, Canada, Germany, France</td>
</tr>
<tr>
<td>Pigmeat</td>
<td>626</td>
<td>712</td>
<td>14</td>
<td>UK (56%), EU (21%); International (25%)</td>
</tr>
<tr>
<td>Seafood</td>
<td>556</td>
<td>845</td>
<td>16</td>
<td>EU (57%) main markets being France, Spain, UK and Nigeria</td>
</tr>
<tr>
<td>Poultry</td>
<td>284</td>
<td>295</td>
<td>3</td>
<td>UK (80%)</td>
</tr>
<tr>
<td>Edible horticulture &amp; Cereals</td>
<td>230</td>
<td>230</td>
<td>0</td>
<td></td>
</tr>
<tr>
<td>Sheepmeat</td>
<td>245</td>
<td>275</td>
<td>12</td>
<td>France &amp; UK (58%); Germany, Sweden and Italy</td>
</tr>
<tr>
<td>Live animals</td>
<td>146</td>
<td>175</td>
<td>21</td>
<td></td>
</tr>
</tbody>
</table>

**Source:** Bord Bia, 2018

Further comment on the export performance of the individual main product sectors is given below (Bord Bia, 2018).
3.1. Meat sector
The combined value of meat and livestock exports increased by 8% in 2017 to €3.95 billion, were exported to 84 markets and represent 31% of total food and drink exports. Exports of all sectors beef, poultry, and in particular sheepmeat, pigmeat and livestock increased. The UK remains the main destination market.

3.1.1. Beef
Irish beef production is a predominantly grass based system. Beef exports increased by 5% to €2.5 billion and the UK remains as the main destination (51%) for Irish beef exports whilst other key markets include France and the Netherlands. Total production of Irish beef rose to 615,000 tonnes in 2017. The number of cattle rose by more than 100,000 head (6.5%). Strong cattle supplies are envisaged to continue for the near future however in 2017 these were offset by lower carcass weights.

3.1.2. Pigs and Pigmeat
The EU market for Irish pigmeat grew by 30% in 2017 with a 14% increase in value to €712 million, driven by higher prices in EU markets. Irish pigmeat is supplied to the Irish domestic market and, in 2016, also to the UK (56% of total market share in value terms) and to a wide range of European (16% exports) and international destinations (28% exports). In 2017 estimated figures indicate an increase of sales to the EU (19%) but a decrease in the international markets (25%).

3.1.3. Sheep and Sheepmeat
Irish sheep numbers surpassed 2.94 million in 2017 representing a ten year high. Approximately 15-18% of the Irish national throughput in sheepmeat is sourced from Northern Ireland and 95% of exports are shipped through the UK.

Irish sheepmeat is supplied to the domestic market and to the EU where France and the UK remain the predominant markets (58% of total exports in 2017, estimated) but Germany, Sweden and Italy were also major export markets. During 2017 Ireland exported approximately 57,000 tonnes of sheepmeat (a ten year high) valued at approximately €275 million, a 12% growth. Future export expansion will be aimed at high value European markets.

3.1.4. Poultry
Whilst the volume of poultry exports only rose by 1% the overall value increased by 3% in 2017 to €295 million. Record numbers of poultry birds (96million) were processed. The UK represented approximately 80% of the export market share by value.

The Avian influenza virus continues to impact EU production and global trade.

3.2. Dairy
Ireland’s dairy herd has grown to over 14 million cows, an increase of 300,000 head in the past four years.

The dairy sector showed the strongest performance in terms of export growth (19%) in 2017, comprising a third of the total and increasing by 19% since 2016. The high levels of demand, particularly for butter (growth rate of 60%) and powders were expected to continue into 2018. Specialist nutrition products accounted for 1.3 billion (30%) of exports.
Irish dairy exports increased in value by 19% in 2017 to €4.02 billion, an increase of €655 million. The top export markets included the UK, China, Netherlands, Germany and the United States.

### 3.3. Fish and Seafood Industry

Exports of Irish seafood in 2017 amounted to €645 million, an increase of 16% from 2016. Whilst Irish seafood is exported to 72 countries, trade to the EU accounted for 65% of seafood export value with the main markets being France, Spain, UK, Italy and Nigeria. Trade to the African markets accounted for 10% of Ireland’s seafood exports.

### 3.4. Prepared consumer foods and Prepared foods

Historically Ireland has exported live animals, meat and freshly harvested crops. More recently prepared consumer foods have been produced and are supplied both domestically and internationally. Exports of such goods increased by 24% from €2 billion to €2.54 billion between 2012 – 2016 (DAFM, 2018). (Similarly, however imports also increased).

Prepared consumer foods differ from prepared foods by including value added meat, seafood, soft drinks and dairy products but do not include dairy enriched powders. Exports of such products showed a 12% growth in 2017 to €2.9 billion. The UK remains the main export market.

Exports of prepared foods grew by 17% to 2.2 billion. Products are exported to 150 markets worldwide, predominantly UK, China, the Netherlands and the United States. Prepared foods are seen as a sector to help drive market diversification.

### 3.5. Retail

The Irish retail grocery market was valued at €9 billion in 2015 (Bord Bia, 2015a) Convenience stores represent approximately 11.1% of the Irish retail market. The three major supermarkets are Musgrave (Supervalu) (22.4%); Tesco (22.8%) Dunnes Stores (23.0%), whilst Aldi (10.4%) and Lidl (10.3.0%) continue to grow market share. (Kantar World Panel accessed 9th February 2018). (Kantar World Panel, 2018).

### 3.6. Future development of Ireland’s agri-food industry

Ireland’s agri-food industry is expected to play a significant role in the country’s ongoing economic development. A ten-year plan was put forward for the agri-food sector in FoodWise 2025 (DAFM, 2015, 2017b), following on from the Food Harvest 2020 (DAFM, 2010) report. FoodWise 2025 is the overarching strategy for the agri-food sector (DAFM, 2017b). It identifies actions to achieve sustainable development and to achieve the following growth projections:

- An 85% increase in the value of exports to €19 billion;
- A 65% increase in the value of primary production to €10 billion;
- A 70% increase in the sector’s value addition to the economy to over €13 billion;
- The creation of 23,000 jobs.

Ireland’s main export market and source of imports is the UK. Bord Bia’s strategy (Bord Bia, 2016) includes that of diversification, exporting to the newer markets in China, Africa and the United States (USA).
4. **STRUCTURE OF THE FOOD SAFETY AND CONTROL SYSTEM IN IRELAND**

**KEY FINDINGS**

- Ireland has an established food safety and control system;
- The principal organisations responsible for developing food policy and legislation are the Department of Agriculture, Food and Marine (DAFM) and the Department of Health (DOH);
- The Food Safety Authority of Ireland (FSAI) assists DAFM and DOH in their roles and, by contract to the DAFM, is also responsible for enforcement;
- Enforcement is undertaken by a number of agencies operating under a system of service contracts with the FSAI;
- Service contracts detail the required services and standards, reports required and frequency;
- Control and responsibility is organised by FSAI to avoid duplication and a cross-agency working group ensures co-ordination and that there are no gaps or overlaps in responsibility and enforcement;
- Cross border collaboration is undertaken with Northern Ireland;
- Following the horse meat incident a Food Fraud Network was established.

This chapter provides an overview of the structure of the food safety and control system in Ireland, the principal organisation of which remains as in 2016.

4.1. **Principal Organisations**

Two Government departments (Central Competent Authorities) are responsible for developing food policy and legislation for food and feed safety, plant health, animal health and animal welfare in Ireland:

- The Department of Agriculture, Food and Marine (DAFM)
- The Department of Health (DOH)

They are supported in this role by The Food Safety Authority of Ireland (FSAI), under the Department of Health. FSAI has overall responsibility for the enforcement of food legislation in Ireland, apart from at the primary production level, which it manages through contractual arrangements with the individual competent authority concerned (see section 4.1.4 below) as well as Memoranda of Understanding with certain bodies (section 4.1.5). A comprehensive national laboratory network is involved in the analysis of samples and provision of scientific research.

DAFM and DOH designate competent authorities in national legislation or through administrative procedures.

4.1.1. **Department of Agriculture, Food and Marine (DAFM)**

The Minister for Agriculture, Food and the Marine is responsible for the development of policy, the negotiation of rules at European Union level and their execution or implementation in national law.
In addition, DAFM is the competent authority for the implementation of official controls in the following food control areas:

- Primary production of food, (excluding fish)
- Slaughter, cutting, preparation and processing of foods of animal origin, including fish, up to but not including, retail level
- Import of food of animal origin and certain foods of non-animal origin control and pesticide residues controls on imported foods of animal origin
- Controls of foods certified as having protected geographical indications (PGI), protected designation of origins (PDO) and / or traditional specialities guaranteed (TSG)
- Pesticide residues
- Organics
- Food contact materials

The Minister for Agriculture, Food and Marine is also the competent authority for feed safety, animal health and welfare and plant health.

There are five business areas within DAFM: Food safety, Animal and plant health and animal welfare; Farm and sector supports and controls; Policy and strategy; Seafood; and Corporate development.

The DAFM comprises eight Assistant Secretaries, the Chief Veterinary Officer, the Chief Agricultural Inspector and the Director of Laboratories (DAFM, 2018b) with approximately 3000 staff who are based at various locations.

The Department has outlined its objectives, strategies and performance indicators including those related to food safety, animal health and welfare and plant health in its recent strategy document and stated its mission as “Serving the government and people of Ireland by leading, developing and regulating the agri-food sector, protecting public health and optimising social, economic and environmental benefits” (DAFM 2017a).

4.1.2. Department of Health (DOH)

The Minister for Health is responsible for the development of policy, the negotiation of rules at European Union level and implementation in national law of those rules for any stage of production, processing or distribution of:

- Food of non-animal origin
- Food of animal origin sold directly to the consumer
- Food of animal origin exempt from Regulation (EC) No 853/2004 laying down hygiene rules for food of animal origin
- Composite products (those for human consumption containing both products of animal origin and products of plant origin)
- The import or export of foods of non-animal origin or composite products

The organisation and execution of official controls are undertaken by a number of competent authorities (see Table 2 and Figure 3).
Table 2: Competent authorities involved in the execution of the National Control Plan

<table>
<thead>
<tr>
<th>Sector</th>
<th>Government Department responsible for Policy and Legislation</th>
<th>Competent Authorities responsible for Official Controls</th>
</tr>
</thead>
<tbody>
<tr>
<td>Food</td>
<td>Department of Health (DOH) Department of Agriculture, Food and Marine (DAFM)</td>
<td>Food Safety Authority of Ireland (FSAI) Department of Agriculture, Food and the Marine (DAFM) Health Service Executive (HSE) Local authorities (LA) Sea Fisheries Protection Authority (SFPA) Marine Institute (MI) National Standards Authority of Ireland (NSAI)</td>
</tr>
<tr>
<td>Feed</td>
<td>Department of Agriculture, Food and Marine (DAFM)</td>
<td>Department of Agriculture, Food and Marine (DAFM)</td>
</tr>
<tr>
<td>Plant Health</td>
<td>Department of Agriculture, Food and Marine (DAFM)</td>
<td>Department of Agriculture, Food and Marine (DAFM)</td>
</tr>
<tr>
<td>Animal Health and Welfare</td>
<td>Department of Agriculture, Food and Marine (DAFM)</td>
<td>Department of Agriculture, Food and Marine (DAFM) Marine Institute (MI) Local authorities (LA)</td>
</tr>
</tbody>
</table>


Figure 3: Government departments, competent authorities and other agencies involved in official controls of foods

Note: The Radiological Protection Institute of Ireland is now part of the Environmental Protection Agency (EPA-ORP). Additional MoU have been signed with Bord Iascaigh Mara and safefood (2016) (not illustrated).
Where possible a single inspectorate is involved in official controls in each food business. The FSAI hosts a cross-agency working group to ensure that there are no gaps in food law enforcement and to minimise any overlaps as indicated in Figure 4 and Tables 1, 2, 3 and 4. In general legislation defines the competent authority responsible for the supervision of the business.

**Figure 4: Stages of the food chain and the competent authorities involved in official controls**

![Diagram showing stages of the food chain and competent authorities](image)


**Note:**
The remit of the FSAI excludes primary production except in the case of fish, although this was under review FSAI, 2012) DAFM is responsible for official controls on primary production of both food of animal production and food of non-animal origin (not illustrated).
### Table 3: Distribution of responsibility according to product type

<table>
<thead>
<tr>
<th>Sector</th>
<th>DAFM</th>
<th>SFPA</th>
<th>Local Authorities</th>
<th>HSE</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Products of animal origin</strong></td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td><em>Meat, milk, eggs</em></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Official controls</td>
<td>X</td>
<td></td>
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</tr>
<tr>
<td>Primary production</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Slaughter</td>
<td>X (High)</td>
<td>X (Low)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Processing</td>
<td>X (High)</td>
<td>X (Low)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Wholesale</td>
<td>X (High)</td>
<td>X (Low)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Distribution</td>
<td>X (High)</td>
<td>X (Low)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Retail</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Imports from third countries (BiPs)</td>
<td>X</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Fish &amp; Shellfish</strong></td>
<td></td>
<td>X</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Official controls</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Primary production</td>
<td>X</td>
<td></td>
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<tr>
<td>Slaughter</td>
<td>X</td>
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<td>Processing</td>
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<td>Wholesale</td>
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<tr>
<td>Distribution</td>
<td>X</td>
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<tr>
<td>Retail</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Imports from third countries (BiPs)</td>
<td>X</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Products of non animal origin</strong></td>
<td></td>
<td>X</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Official controls</td>
<td>X</td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Primary Production</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Harvesting</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Manufacturing</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Processing</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Wholesale</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Distribution</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Retail</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Import</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(Pesticide residues)</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td><strong>Composite Products</strong></td>
<td></td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Dependent on nature of product and volume</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
</tbody>
</table>

**Source:** DAFM, FSAI (2012) National control plan for Ireland, 2012 – 2017

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1 Official controls of slaughter houses, meat processing, wholesale and distribution establishments is dependent on throughput as defined in legislation implementing Regulation (EC) 853/2004.
Table 4: Categories of food legislation in each of the FSAI service contracts

<table>
<thead>
<tr>
<th>Category of Legislation</th>
<th>HSE</th>
<th>LA</th>
<th>DAFM</th>
<th>SFPA</th>
<th>MI</th>
<th>NSAI</th>
</tr>
</thead>
<tbody>
<tr>
<td>General food law (including traceability)</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Official controls</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Food Hygiene</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Control of imports</td>
<td>✓</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Labelling, presentation and advertising</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Additives and Flavourings</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Contaminants</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>Residues of Veterinary Medicines</td>
<td></td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Pesticide residues</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>✓</td>
</tr>
<tr>
<td>Microbiological criteria</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
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<tr>
<td>Aquaculture</td>
<td>✓</td>
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<tr>
<td>Specified risk material</td>
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<td>✓</td>
<td>✓</td>
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<tr>
<td>Zoonoses</td>
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<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
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</tr>
<tr>
<td>Food contact materials</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>Slaughter of animals</td>
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<td>✓</td>
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<tr>
<td>Foods for particular nutritional uses</td>
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<td>✓</td>
<td>✓</td>
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<tr>
<td>Genetically modified foods</td>
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<td></td>
<td></td>
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<tr>
<td>Novel foods</td>
<td></td>
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<tr>
<td>Processed cereal-based foods</td>
<td>✓</td>
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<tr>
<td>Infant formula</td>
<td>✓</td>
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<td></td>
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<tr>
<td>Foodstuffs treated with ionising radiation</td>
<td></td>
<td></td>
<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td>Marketing standards</td>
<td>✓</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Organic foods</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Use of protected names</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>✓</td>
</tr>
<tr>
<td>Food supplements</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>✓</td>
</tr>
<tr>
<td>Nutrition and Health claims</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Bottled water</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Food fortification</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Manufacturing and processing methods</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Source: DAFM, FSAI 2012 National Control Plan for Ireland 1st January 2012 to 31st December 2017
<table>
<thead>
<tr>
<th>Sector</th>
<th>Policy co-ordination</th>
<th>Co-ordination of controls</th>
<th>Implementation of controls</th>
<th>Laboratorie s</th>
<th>Risk assessment / scientific advice</th>
</tr>
</thead>
<tbody>
<tr>
<td>Animal health</td>
<td>DAFM</td>
<td>DAFM / MI</td>
<td>DAFM / LA / MI</td>
<td>CVRL / RVL / BTL / MI</td>
<td>CVRL</td>
</tr>
<tr>
<td>Food of animal origin</td>
<td>DAFM / DoH</td>
<td>FSAI</td>
<td>FSAI / DAFM / HSE / LA / SFPA / NSA</td>
<td>EPA-ORP, VPHRL, DSL, VFSL, MI, FSLS, SL</td>
<td>CVRL, VPH, RL, DSL, VFSL, FSAI / MI</td>
</tr>
<tr>
<td>Import of animal and food of animal origin</td>
<td>DAFM</td>
<td>DAFM, CUSTOMS, FSAI</td>
<td>DAFM, CUSTOMS, FSAI</td>
<td>VPHRL, DSL, MI, CVRL</td>
<td>VPHRL, DSL, MI, CVRL, FSAI</td>
</tr>
<tr>
<td>Feedingstuffs and animal nutrition</td>
<td>DAFM</td>
<td>DAFM, CUSTOMS</td>
<td>DAFM, CUSTOMS</td>
<td>SL, PAL, PRL, CPL</td>
<td>SL, PAL, PRL, CPL</td>
</tr>
<tr>
<td>TSEs, ABP</td>
<td>DAFM</td>
<td>DAFM, FSAI, LA, HSE</td>
<td>DAFM, FSAI, LA, HSE</td>
<td>CVRL, STS, RVL</td>
<td>CVRL, FSAI, DAFM</td>
</tr>
<tr>
<td>Veterinary medicines authorisation, marketing &amp; distribution</td>
<td>DAFM, HRPA</td>
<td>DAFM, HRPA</td>
<td>DAFM, HRPA</td>
<td>HRPA Contracted labs</td>
<td>HRPA Contracted labs</td>
</tr>
<tr>
<td>Veterinary medicines Residues</td>
<td>DAFM</td>
<td>FSAI, DAFM, LA, SFPA</td>
<td>FSAI, DAFM, LA, SFPA</td>
<td>VPHRL, SL, MI, TFRC, PCL, DSL</td>
<td>VPHRL, SL, MI, TFRC, PCL, DSL, VFSI</td>
</tr>
<tr>
<td>Foodstuffs and Food hygiene / GMO</td>
<td>DAFM, DoH</td>
<td>FSAI, DAFM, HSE, NSAI*</td>
<td>FSAI, DAFM, HSE, NSAI*</td>
<td>FSLS, VPHRL, VFSL, PALS</td>
<td>FSAI, FSLS, EHS, DAFM</td>
</tr>
<tr>
<td>Imports of foods of plant origin</td>
<td>DAFM, DoH</td>
<td>FSAI, HSE, DAFM, CUSTOMS</td>
<td>FSAI, HSE, DAFM, CUSTOMS</td>
<td>FSLS, PCL</td>
<td>HSE, FSAI</td>
</tr>
<tr>
<td>PPPs – authorisation, marketing and use</td>
<td>DAFM</td>
<td>DAFM</td>
<td>DAFM</td>
<td>PCL</td>
<td>DAFM</td>
</tr>
<tr>
<td>PPPs – residues</td>
<td>DAFM</td>
<td>DAFM</td>
<td>DAFM, FSAI</td>
<td>PCL</td>
<td>PCD, FSAI</td>
</tr>
<tr>
<td>Animal welfare</td>
<td>DAFM</td>
<td>DAFM</td>
<td>DAFM, LA, SFPA</td>
<td>CVRL</td>
<td>CVRL, FAWAC</td>
</tr>
<tr>
<td>Plant health</td>
<td>DAFM</td>
<td>DAFM, CUSTOMS</td>
<td>DAFM, CUSTOMS</td>
<td>CPL</td>
<td>CPL</td>
</tr>
<tr>
<td>Quality labelling</td>
<td>DAFM</td>
<td>DAFM/FSAI/HSE</td>
<td>DAFM/FSAI/HSE/SFDA / LA</td>
<td>HSE</td>
<td>DAFM/FSAI</td>
</tr>
</tbody>
</table>

**Source:** European Commission, Directorate for Health and Food Audits and Analysis, DG SANTE (2017a) (*NSAI for recognition of mineral waters*)
4.1.3. Food Safety Authority Ireland (FSAI)

The FSAI was established through the Food Safety Authority Ireland Act 1998 and acts as an independent science-based regulatory enforcement agency for food safety. It is the competent authority with overall responsibility for the enforcement of food legislation in Ireland and is the national agency responsible for ensuring that foods produced, distributed and marketed in Ireland are safe to eat. The Department of Health is the parent department of the FSAI.

The FSAI launched a strategy document in 2016 setting out a new vision, mission, values and strategic goals and objectives for 2016 – 2018 (FSAI, 2016) to further foster a partnership approach, working collaboratively with those in the food safety community. At the same time the FSAI underwent re-structuring. There are five administrative divisions: Corporate Affairs, Enforcement Policy, Audit and Investigations, Risk Management and Regulatory Affairs, and Food Science and Standards (FSAI, 2018).

The FSAI’s mission statement is as follows: “protect consumers by leading a collaborative food safety community to continuously raise food standards and create a culture of excellence” (FSAI, 2016)

The responsibility for enforcement of food legislation continues to be managed through contractual arrangements (service contracts) between the FSAI and a number of competent authorities involved in the enforcement of food legislation. The FSAI performs a key function in co-ordinating the implementation of food legislation and is responsible for the co-ordination of food control activities within and between competent authorities, determining inter-agency supervisory arrangements and ensuring consistency of enforcement. The FSAI is directly responsible for the enforcement of some legislation. The majority of food legislation is enforced by competent authorities who thus carry out controls under service contract to the FSAI.

Thus, food legislation is enforced by the FSAI via a network of 33 official agencies through the service network programme. The FSAI monitors and reports on these activities and seeks continuous improvement and accountability through a programme of regular audits. Enforcement is complemented by awareness campaigns, practical advice and guidance for the food industry.

In addition, the FSAI engages with the food industry to encourage compliance and to make food businesses aware of their responsibilities. In this regard the FSA has established four industry fora whereby certain sectors of the food industry can raise pertinent issues and gain important information from the Authority.

The FSAI manages food incidents and emergencies and is the co-ordinating body for food alerts and withdrawals. It is the national contact point for the EU Rapid Alert System for Food and Feed (RASFF) in Ireland, the International Network of Food Safety Authorities of the World Health Organisation and the Food Fraud Network. The work also involves tackling food crime which involves collaboration with a number of external bodies including Revenue – Irish Tax and Customs service, An Garda Siochána and the competent authorities with a role in official controls for food safety (FSAI, 2016)

Other roles undertaken by the FSAI

- Direct involvement in control activities including audits, inspections, certification, investigation of food incidents and monitoring and surveillance
- The provision of scientific and technical support to competent authorities and industry via the publication of reports, guidance notes, codes of practice and information leaflets.
• Contributing to the risk assessment process
• Provision of training for officials in competent authorities
• Chairs working groups to progress issues in relation to official controls specific to a competent authority or inter-agency working groups as appropriate
• Data management in relation to official food control data.

4.1.4. FSAI Enforcement activities and Service contracts
The FSAI enforces food legislation through a service contract mechanism in conjunction with various official agencies. Details of the commercial service contracts (in place for a minimum of three years) are available on the FSAI website. A number of these were renewed in 2016. Where appropriate, the official agencies have been confirmed as competent authorities in clause 2 of their service contracts. The aim of the service contract is to ensure the effective and consistent enforcement of food-law through a risk-based approach and accountability of each competent authority in enforcing food legislation. The service contracts detail the contracted services required, the service levels and reporting requirements and procedures and each competent authority provides the FSAI with an annual service plan detailing how the required objectives will be fulfilled.

In 2016, just over 49,404 businesses (a slight increase on the previous year, although the distribution of which was similar to the previous five years) were under the supervision of official agencies under contract to the Authority. Of the registered food businesses inspected about 92% were inspected by the Health Service Executive; 5% by Sea-Fisheries Protection Authority; 2% by DAFM and 1% by local authorities. Those food businesses which carry out activities that present the greatest potential risk to human health are prioritised for inspection. Over recent years there has been a decline in inspections with an increasing focus on thorough audits of food safety management systems in larger businesses and those presenting a greater risk to the public health (FSAI, 2017).

The FSAI is responsible for the co-ordination of food control activities within and between competent authorities, determining inter-agency supervisory arrangements and ensuring consistent enforcement of horizontal legislation across the different competent authorities involved in the official control of food. It communicates with the competent authorities involved in food controls through regular liaison meetings and has established an extranet service called Safety Net, which allows for the sharing of information between competent authorities involved in food controls. The effectiveness of the application of horizontal legislation is assessed through FSAI audits and Directorate for Health and Food Audits and Analysis, DG SANTE audits.

The Authority’s Scientific Committee undertook a review of the Irish official controls system (FSAI, 2015) which made thirteen recommendations to strengthen the system. As such the FSAI formed a cross-agency group to identify and implement enhancements in the official control system in future years. The EU review of legislation on official controls, on which political agreement was reached in 2016 and compliance with its requirements will be mandatory from 2019 (2018 for certain provisions) will guide this activity. A new enforcement policy was drafted and expected to be agreed in 2017 following consultation with other official agencies.

The national controls system audit by the European Commission (2017c) identified only minor issues which were being resolved.
**Department of Agriculture Food and Marine (DAFM)**

DAFM carries out official controls in accordance with legislative requirements, the requirements of the service contract with FSAI, DAFM business plans and sampling plans.

**Health Service Executive (HSE)**

The HSE was established under the Health Act 2004 and is part of the Department of Health. The FSAI has a service contract with the HSE to provide the following food control services:

- Environmental health services (EHS) which are organised nationally (an Assistant National Director is supported by four regional Chief Environmental Health Officers) and locally by principal environmental health officers. Services provided include inspection of relevant food premises; food sampling to ensure compliance; management of food alerts and outbreaks; compliance building and education measures. HSE is responsible for import controls on products of non-animal origin.

- Food safety laboratory services, which consist of a network of laboratories comprising three Public Analyst Laboratories (PAL) responsible for physical/chemical analysis of food samples and six Official Food Microbiology Laboratories (OFML) responsible for the microbiological testing of foodstuffs (Dublin PAL is a seventh OFML as it undertakes microbiology testing), analyse samples taken during official controls by environment health officers. All of these laboratories are accredited to EN ISO 17025 on ‘General requirements for the competence of testing and calibration of laboratories’. Each has local management structures in place. These laboratories analyse samples taken during official controls to support inspection, as part of monitoring and surveillance programmes or as part of the investigation of an outbreak, incident, food alert or consumer complaint.

- Public health medical services which participate in multi-disciplinary investigating, managing and controlling outbreaks of foodborne disease.

**Local authorities**

The FSAI has contracts with 25 individual local authorities which are multipurpose bodies responsible for an extensive range of services, including veterinary services. Local authorities come under the auspices of the Department of Housing, Planning and Local Government. The majority of local authorities have a local structure involving a County Manager, a Director of Services, the County Veterinary Officer, temporary veterinary inspectors and administrative support. Local authority veterinary officers are normally employed directly by local authorities.

Local authorities use the FSAI centralised official agency premises inspections (OAPI) database to record information regarding their official control responsibilities. This database collates local and regional data for all local authorities.

**Sea Fisheries Protection Authority (SFPA)**

The SFPA was established in 2006 to enforce national and EU regulations on sea-fisheries conservation and seafood safety. DAFM is the SFPA’s parent authority.

The SFPA has port offices around the coast including in the main fishing ports.

The SFPA, DAFM Import Control Division, Marine Institute and relevant laboratories agree an annual plan for sampling fishery products and other seafood at the Border Inspection Posts (BiPs) in Dublin Port and Shannon Airport. The sampling plan covers microbiological and chemical sampling and analysis.
**Marine Institute (MI)**
The Marine Institute established in 1991 provides analytical, technical and advice services to the SFPA and DAFM (FSAI). DAFM is the parent department of the MI.

**National Standards Authority of Ireland**
The NSAI provides certification to nationally / internationally recognised standards for processes and services. It also has responsibility for the enforcement of legislative requirements in relation to the recognition and exploitation of natural mineral waters bottled in Ireland and official controls on the production, distribution and import of food contact materials.

### 4.1.5. FSAI and Memoranda of understanding

In addition, the FSAI has a Memorandum of Understanding with the following organisations who have a role in food safety but are not involved specifically with the enforcement of food legislation:

**Environmental Protection Agency – Office of Radiological Protection (EPA-ORP)**
The ERA-ORP carries out extensive monitoring of radioactivity in the food chain and the environment in fulfilment of its statutory obligation under the Radiological Protection Act, 1991. It also is the responsible authority in relation to granting of food irradiation licences to irradiation facilities.

**Revenue Customs Service**
Customs are involved with FSAI, DAFM and HSE in relation to the import controls of products of non-animal origin and food contact materials subject to emergency measures and increased official controls and certain products of non animal origin subject to increased controls (pesticide monitoring) and in addition in relation to food fraud and counterfeit food.

Customs are involved with DAFM in relation to the import of live animals from third countries and products of animal origin (POAO) from third countries at BiPs. All products require inspection by DAFM before released into free circulation.

**Loughs Agency**
The Loughs Agency is responsible for sampling commercially caught, grown and / or harvested shellfish in the Foyle and Carlingford areas.

**safefood**
An updated MoU was signed with safefood in 2016. Both agencies share the common goal of protecting consumers’ health and consumer’s interests in the area of food safety.

**Bord Iascaigh Mhara**
Bord Iascaigh Mhara helps to develop the Irish Seafood Industry by providing technical expertise, business support, funding, training and promoting responsible environmental practice.

### 4.1.6. Other agreements

Although not in the form of a service agreement the FSAI has a Memorandum of Understanding with the Food Standards Agency (Northern Ireland). FSAI undertakes close cooperation and collaboration with the Food Standards Agency in Northern Ireland. This is
supported by the MoU which is designed to ensure rapid and effective co-operation in the event of a food incident and common enforcement matters in both jurisdictions.

4.1.7. Laboratories
Details of approved laboratories are available on the FSAI website.
Laboratories offer a range of analytical services and fall into one or more of the following categories: National reference laboratory; Official laboratory; Other (specialist) laboratory; Private laboratory. Laboratories used for official controls are accredited to EN ISO 17025.

4.1.8. Crisis Management
The FSAI has an internal crisis management plan, the protocol for which was updated in 2014, which links to the EU plan and to the contingency plans in the relevant competent authorities. The crisis plans are in place at national and regional level for dealing with crisis incidents, large scale food safety incidents and outbreaks of food-related disease.

4.2. Legislation
The legal foundation of food law in Ireland is The Food Act as amended, which is in line with Regulation (EC) No. 178/2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety.

Food legislation is defined in the Food Safety Authority Act 1998 (FSAI Act) to include the Acts, Statutory Instruments and the EC regulations set out in the First schedule of that Act in so far as they relate to food safety and hygiene. Each piece of Irish legislation giving effect to specific EU food safety legislation also has enforcement powers appropriate to the EU legislation.

Ireland has a Multi-Annual National Control Plan (MANCP). The current version initially covered the period 2012 – 2015 and was subsequently extended to 2016 and again to 31 December 2017. No new MANCP has been published. The current version is available from the FSAI (and DAFM) websites (FSAI, 2012). This details the controls in place for food, feed, animal health, animal welfare and plant health. Controls are risk-based and are intended to protect the public, animal and plant health and consumer interests in a manner which does not impose unnecessary burdens on the food and feed business operators.
5. **DIRECTORATE FOR HEALTH AND FOOD AUDITS AND ANALYSIS, DG SANTE**

**KEY FINDINGS**

- Employing approximately 170 staff, the Health and Food Audits and Analysis Directorate, DG SANTE is based in Grange, Co. Meath, Ireland;
- Its role is to support the Commission in ensuring that European Union legislation on food safety, animal health, plant health and animal welfare is properly implemented and enforced;
- A multi-annual work programme is developed in line with key Commission strategic priorities. This is organised by projects and the associated programme of audits and analysis;
- The Health and Food Audits and Analysis Directorate fulfils this role by undertaking audits (approx 250 year) and fact-finding missions of Member States, acceding and candidate countries and other third countries; reporting its findings; making recommendations for improvements; requesting action plans to address any shortcomings; following up to ensure implementation of its recommendations and the verification of corrective actions;
- The Health and Food Audits and Analysis Directorate reports help identify immediate threats and contribute to the development of European Union policy and the development and implementation of effective controls in the area of food safety, animal health, plant health and animal welfare;
- The Health and Food Audits and Analysis Directorate informs interested stakeholders, including the consumer, by making its reports freely accessible via the DG SANTE website;
- The Health and Food Audits and Analysis Directorate also contributes to the training of enforcement staff.

This chapter provides an overview of the Directorate-General for Health and Food Safety (DG SANTE) and in particular its Directorate on Health and Food Audits and Analysis. This directorate has recently changed its name to reflect the expansion of its tasks having previously been known as the European Food and Veterinary Office (FVO). Whilst the standard operational procedures remain as previously in 2016 the areas of focus continue to be adjusted according to assigned priorities.

### 5.1. **Introduction**

The European Commission’s Directorate-General for Health and Food Safety (DG SANTE) is responsible for EU policy on food safety and health and for monitoring the implementation of related laws. The Directorate on Health and Food Audits and Analysis carries out audits, inspections, fact-finding missions and related non-audit activities aimed at ensuring that EU legislation on food safety, animal health, animal welfare, plant health and some areas of human health is properly implemented and enforced. Since 2002 the Directorate on Health and Food Audits and Analysis has been based in Grange, Co. Meath, Ireland.

Approximately 170 staff from most EU Member States work in the Directorate on Health and Food Audits and Analysis including inspectors (who participate regularly in on-the-spot
inspection missions), management and support staff. Inspectors are typically veterinarians, agronomists and similarly qualified specialists.

5.2. Role of the Directorate General (DG) for Health and Food safety

The European Commission is responsible for ensuring that European Union legislation on food safety, animal health, plant health and animal welfare is properly implemented and enforced. The Directorate on Health and Food Audits and Analysis plays a major role in fulfilling this task and works to assure effective control systems and to evaluate compliance with EU standards within the EU, in acceding and candidate countries to assess their preparedness for joining the EU and in third countries in relation to their exports to the EU.

**Figure 5: Organisation chart of the Directorate on Health and Food Audits and analysis within DG SANTE**

Source: DG SANTE organisation chart 01/02/2018 (European Commission, 2018)

5.3. Mission of the Directorate on Health and Food Audits and Analysis

- Check on compliance with the requirements of EU food safety and quality, animal health and welfare and plant health legislation within the European Union and on compliance with EU import requirements in third countries exporting to the EU,
- Contribute to the development of European Union policy in the food safety, animal health and welfare and plant health sectors,
• Contribute to the development and implementation of effective control systems in the food safety, animal health and welfare and plant health sectors,
• Inform stakeholders of the outcome of its audits and inspections.

5.4. **Methods adopted**

• Conducting targeted audits / fact finding missions
• Fact finding missions are organised in areas where the Commission needs to complete its knowledge about the operation of legislation on the ground; the results of these missions provide input into the review or development of legislation.
• Individual audit reports on the findings and making recommendations
• Following up on corrective actions
• Overview reports
• Desk based analyses to obtain a thorough overview of a topic, identify potentially problematic areas and prioritise audits

5.4.1. **Audits (inspections / missions)**

Audits are carried out under the general provisions of European Union legislation and in particular Articles 45 and 46 of Regulation (EC) 882/2004 of 29 April 2004 on official controls performed to ensure the verification of compliance with feed law, animal health and animal welfare rules as amended and, for plant health, Articles 21 and 27(a) of Council Directive 2000/29 on the protective measures against the introduction into the Community of organisms harmful to plants or plant products and against their spread in the Community.

Audits verify the effectiveness of national control systems for enforcing the relevant European Union standards in the fields of food safety animal health and welfare and plant health. Each audit may be on specific sectors or all sectors. Since 2007, and subject to Article 45 of Regulation (EC) No 882/2004 The Directorate on Health and Food Audits and Analysis has also undertaken general audits which are intended to give an overall view of the operation of official controls at national level. In recent years increased emphasis has been placed on the need for Member States to ensure that official controls are risk based and are conducted with appropriate frequency.

DG Health and Food Safety establishes a multi-annual audit and analysis programme in line with key Commission strategic priorities. The work programme of DG Health and Food safety is then organised in project areas which have defined objectives, scope, outputs and timeframes. Initially desk based analyses may be conducted to provide an overview of the topic, identify possible problematic areas and prioritise audits or fact-finding missions.

Within each project the programme of audits is developed each year in consultation with other Commission services and with Member States after a careful consideration of factors,

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2 Regulation (EC) 882/2004 has recently been reviewed and will, after a transition period, be replaced by Official Controls Regulation (EU) 2017/625. The Regulation was published in the Official Journal of the European Union on 7 April 2017 and entered into force on the 27 April 2017. The new rules will gradually become applicable with the main application date being 14 December 2019. The scope of the new Regulation has been extended and will now cover official controls to verify compliance with food and feed law, animal health and welfare, plant health and animal-by products rules. There are also new provisions to enhance transparency of official controls and increase Competent Authorities’ accountability to consumers and operators. The new controls are also intended to reduce the number of items of legislation, provide a more effective and transparent system of controls along the chain and have simpler science and risk based rules.
most notably risk but also legal requirements, trade and policy considerations. It builds on a multi-annual plan that is reviewed annually to make sure it is up-to-date and focuses on the areas of highest risk. The aim of the audit and analysis strategy for 2016 – 2019 (European Commission, 2017d) is to achieve a high level of coverage of the priority areas identified by DG Health and Food Safety as requiring scrutiny as to the level and effectiveness of control and enforcement measures. This in turn allows weaknesses and the corresponding corrective measures to be identified and taken up with the relevant authorities.

A particular focus of the planned audit and analysis work is on the following Commission and DG Health and Food Safety objectives:

- **Tackling antimicrobial resistance (AMR)** – DG Health and Food Safety has highlighted this area as a key challenge in its Strategic Plan 2016 – 2020 (European Commission, 2016a). Actions implemented in the EU include harmonised legislation on AMR monitoring in food and animals and continuing assessment of AMR monitoring programmes (as required by Decision 2013/652/EU on the monitoring and reporting of antimicrobial resistance in zoonotic and commensal bacteria, as well as its project on the prudent use of antimicrobial veterinary medicinal products in food producing animals.

- **Better preparedness, prevention and response to human health, animal and plant health threats**

- **Safe and sustainable food and feed production systems**

- **Ensuring effective implementation of EU food legislation**

- **Ensuring a sustainable food production that improves the welfare of animals**

- **Effective, efficient and reliable controls** – to ensure that Member state’s control systems are effective, efficient and reliable. Activities include audits and fact-finding missions on specific horizontal requirements of Regulation (EC) No 882/2004 and the systematic follow up of audit recommendations to ensure that Member States and non-EU countries implement the actions necessary to correct identified short comings in addition the Better Training for safer Food (BTSF) programme provides the opportunity to discuss common problems identified during the assessment work and to exchange good and best practice between countries.

- **Identification of unnecessary legislative burden for food business operators or national authorities e.g. by exploring synergies with applicable private standards in the food and feed sectors.**

The programme for 2017 consisted of 55 projects with audit and desk-based control activities. The outcome of the projects will be summarised in overview reports which also form the basis for a discussion with Member States of common problems identified and best practices to share.

The work programme is distributed to Member States and published in advance on the DG Health and Food Safety website (European Commission, 2017d). Priority areas and countries are identified in the programme and reviewed mid-year (when a revised programme is published).

56% of all projects were to be conducted in Member States (or deal with Member States); 20% with non-EU countries and 24% with both Member States and non-EU countries.

The 55 projects comprise of 212 audits corresponding to approximately 5,000 auditor days on the ground.
Table 6: Projects on audit and analysis in 2017, by main topic area

<table>
<thead>
<tr>
<th>Project</th>
<th>Audits</th>
<th>Fact finding missions</th>
<th>Desk-based</th>
<th>Percent (%) of Projects</th>
</tr>
</thead>
<tbody>
<tr>
<td>Health</td>
<td>3</td>
<td>1</td>
<td>2</td>
<td>7</td>
</tr>
<tr>
<td>Animal health and zoonoses</td>
<td>4</td>
<td>1</td>
<td>2</td>
<td>18</td>
</tr>
<tr>
<td>Animal welfare</td>
<td>2</td>
<td>1</td>
<td>0</td>
<td>18</td>
</tr>
<tr>
<td>Plant health</td>
<td>3</td>
<td>2</td>
<td>1</td>
<td>10</td>
</tr>
<tr>
<td>Food safety</td>
<td>10</td>
<td>6</td>
<td>6</td>
<td>40</td>
</tr>
<tr>
<td>Food quality</td>
<td>1</td>
<td>0</td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>Genetically modified organisms</td>
<td>1</td>
<td>0</td>
<td>0</td>
<td>2</td>
</tr>
<tr>
<td>Feed and animal by-products</td>
<td>1</td>
<td>1</td>
<td>0</td>
<td>4</td>
</tr>
<tr>
<td>Import controls and import/export support systems</td>
<td>2</td>
<td>2</td>
<td>2</td>
<td>7</td>
</tr>
<tr>
<td>Horizontal issues, follow-up and BTSF training</td>
<td>2</td>
<td>2</td>
<td>2</td>
<td>11</td>
</tr>
<tr>
<td>Total</td>
<td>29</td>
<td>16</td>
<td>10</td>
<td></td>
</tr>
<tr>
<td>Percent (%) of activity</td>
<td>53</td>
<td>18</td>
<td>29</td>
<td></td>
</tr>
</tbody>
</table>

Source: European Commission, 2017d

Table 7: Audits and fact-finding missions planned for 2017, by main topic area

<table>
<thead>
<tr>
<th>Audit programme for 2017</th>
<th>Number</th>
<th>% of visits</th>
</tr>
</thead>
<tbody>
<tr>
<td>By subject</td>
<td>Audit</td>
<td>Fact finding</td>
</tr>
<tr>
<td>Health</td>
<td>7</td>
<td>7</td>
</tr>
<tr>
<td>Animal health and zoonoses</td>
<td>17</td>
<td>8</td>
</tr>
<tr>
<td>Animal welfare</td>
<td>11</td>
<td>1</td>
</tr>
<tr>
<td>Plant health</td>
<td>21</td>
<td>10</td>
</tr>
<tr>
<td>Food safety</td>
<td>59</td>
<td>23</td>
</tr>
<tr>
<td>Food quality</td>
<td>13</td>
<td>6</td>
</tr>
<tr>
<td>Genetically modified organisms</td>
<td>2</td>
<td>0</td>
</tr>
<tr>
<td>Feed and animal by-products</td>
<td>1</td>
<td>9</td>
</tr>
<tr>
<td>Import controls and import / export support systems</td>
<td>11</td>
<td>0</td>
</tr>
<tr>
<td>Horizontal issues, follow-up and BTSF training</td>
<td>15</td>
<td>7</td>
</tr>
</tbody>
</table>

Source: European Commission, 2017d

Audits comprise 74% of all visits and fact-finding missions 26%.
Whilst priorities are assigned by area and sector there are also a number of cross-sectoral priorities.

**Figure 6: Audits and fact-finding missions planned for 2017, by country**

5.4.2. Reporting

Various types of reports are produced

- Audit reports – set out findings, conclusions and recommendations to a country’s competent authority to deal with any shortcomings revealed during the inspections. The competent authority of the country visited is able to comment on the draft report.

- Overview reports – identify what is working, or not, in relation to the enforcement of controls (and the interpretation of legislation). They also form the basis for meetings with member State experts in the framework of the BTSF programme to discuss common problems identified and to exchange best practice.

- Country profiles – constitute an overview of a country’s control systems, progress on recommendations and a compilation of key information.

- Special reports – on a specific theme provide an overview of a series of inspections, e.g. traceability, import controls, animal welfare.

- The Directorate on Health and Food Audits and Analysis Annual report – since 2009 annual reports have been incorporated into the European Commission reports on the overall operation of official controls in the Member States. The latest report was published in 2013.

5.4.3. Follow up and enforcement

Following receipt of the report the competent national authority is requested to present an action plan to the Directorate on Health and Food Audits and Analysis on how it intends to address, or has addressed, any shortcomings. Together with other Commission services, the Directorate on Health and Food Audits and Analysis evaluates this action plan and systematically monitors its implementation through a number of follow-up activities such as general review missions, follow-up inspections and requests for written reports. In the case of persistent problems high-level meetings are held between the Commission and the
authorities concerned. As a last resort, legal action may be taken under EU law by the Commission to ensure that Member States meet their obligations under European Union law.

In the case of an immediate threat to the consumer, animal or plant health being identified emergency measures may be taken. These may include legal action to prevent trade or imports of animals, plants of their products.

5.5. Summary
In summary the Directorate on Health and Food Audits and Analysis reports provide meaningful independent information on how a country’s national control systems have been performing in the areas covered by its audits during the reporting period. They also highlight areas where the Commission may need to consider amending existing legislation, developing new controls or policies.

All the Directorate on Health and Food Audits and Analysis reports are available on the DG SANTE website and are accessible to the public.

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3 During 2009-2010 the Commission launched infringement proceedings against Greece due to persistent failure to comply with a range of important components of EU food safety legislation and issued reasoned opinions against Spain and Italy.
6. CURRENT FOOD SAFETY ISSUES

**KEY FINDINGS**

- The food industry is responsible for placing safe food on the market and for ensuring that consumers are not misled;
- Food incidents, of varying severity, do occur;
- Following the horsemeat incident in 2013 subsequent incidences of food fraud have been very varied in nature;
- Of the reported food fraud incidences in 2016 the main category was that of Mislabelling – Composition and the main product categories concerned were meat, fish, fats and oils;
- Many food recalls relate to labelling issues e.g. the presence of undeclared allergens;
- Antimicrobial resistance and hence the incidence of microbiological and zoonotic infections are of concern;
- Campylobacteriosis was the most commonly reported zoonosis;
- Other aspects of food safety including microbiological and chemical contamination and animal welfare continue to require attention and surveillance;
- Such incidents inform developments and improvements to food control.

All food business operators are required to ensure that foods they produce or supply satisfy the requirements of food law and that they can verify that such requirements are met. Amongst the requirements are that the labelling, advertising and presentation of food must not mislead consumers with respect to the safety or the authenticity of food. In addition, traceability must be established and detailed records kept.

Food incidents however do occur which can be restricted to the local or national level or can, on occasion, affect the food chain throughout the EU. The resolution of such incidents tests the food control system but ultimately leads to improvements by identifying weaknesses and areas that require additional attention, including the need for renewed guidance, training or the introduction of, or amendment to, legislation.

A summary of recent food safety incidents that have occurred in Ireland, and in the EU, are given below.

**6.1. Food authenticity**

The investigation into the adulteration of foods containing beef with horse meat, that occurred in 2012 / 2013 and the follow up actions have been documented and the details reported in the earlier 2013 and 2016 reports (European Parliament, 2013, 2016) and therefore is not discussed in further detail here.

The incident did however raise concerns specifically in relation to the traceability of meat ingredients and products entering the food chain; fraudulent mislabelling where consumers were being misled and to the issue of food fraud more generally.

Subsequent actions undertaken are summarised below
6.1.1. Food Fraud Task Force

The horse meat incident highlighted the difficulty for Member States’ competent authorities to communicate efficiently with their counterparts in other Member States for the purposes of ensuring enforcement in cases of violations having cross-border impact. Food Fraud Contact Points were established to handle specific requests for cross-border cooperation in cases of food fraud (suspected intentional and/or economically motivated violations). These still communicated however via conventional means. The Rapid Alert System for Food and Feed (RASFF) was established as a reporting system for incidents potentially affecting public health. The horse meat incident was not initially considered to be a food safety issue and so fell outside the scope of the RASFF system and therefore, at that time, there was no easy mechanism for the reporting of other incidents outside the scope of RASFF.

6.1.2. Europe

The European Commission established a special working group of Member States, in which Interpol participated, to deal with issues associated with food fraud and to strengthen cooperation between Member States in tackling fraudulent practices in the food chain – the Food Fraud Network (FFN). One of the key initiatives was the development of the Administrative Assistance and Cooperation system. This is an IT network, like RASFF, to provide a structured communication system through which Member States could communicate for the timely detection and investigation of food crime cases in the food chain. It is accessible via the internet, including via mobile devices.

The Administrative Assistance and Cooperation system was launched on 18 November 2015. After an initial trial period with specialised liaison groups working on fraudulent activities it was also made available in 2016 to other liaison bodies working on any other non-conformances within the scope of the Official Controls. Thus, the Administrative Assistance and Cooperation system and RASFF work in synergy to maintain EU standards for food and feed. The EU FNN consists of contact points in each of the Member States and the Commission and in the latter half of 2016 this was extended to include Switzerland, Norway and Iceland. Similarly, the FNN was also extended to include additional liaison bodies to those in the Administrative Assistance and Cooperation system.

243 cases were exchanged in the Administrative Assistance and Cooperation system in 2016 and the majority of these in the third quarter.

Four key operative criteria are used to identify whether a case relates to food fraud or non-compliance: Violation of EU law; Intention; Economic gain; Deception of customers. Cases meeting all four criteria are considered to be food fraud.

156 cases in 2016 were considered to be food fraud. The category of violation with the most number of reported cases was that of Mislabelling – Composition and the product category mostly concerned was meat (28) and subsequently fish and fish products (22); fats and oils (20).

Of those cases requesting administrative assistance but which were not food fraud related the category of violation with the most reported cases was the use of an unapproved treatment / process (23); mislabelling – composition (20) and document issues (17). The main product category was dietetic foods, food supplements, fortified foods (16) (European Commission, 2016b)

Whilst the RASFF system recorded 110 notifications in the category related to adulteration / food fraud it comments that the majority of these are most likely not food fraud. The main reasons given in this category were health certificate issues; illegal import and document issues. Four however were considered serious.
6.1.3. Ireland

FSAI established, and chairs, a National Food Fraud Task Force consisting of representatives from national agencies involved with enforcement, including DAFM, Local authorities, An Garda Síochána, the Health Products Regulatory Authority, Food Standards Agency Northern Ireland and the Revenue and Customs Agency. It is an advisory group acting as a communications, coordination and networking group where intelligence can be shared at national and international level. In addition it raises awareness, improves mechanisms for monitoring and surveillance and training for enforcement officers and those whose roles would not be primarily working with food.

In 2016 the FSAI was involved in 34 investigations where breaches of food law or food fraud were suspected. The outcome of the investigations resulted in enforcement and criminal proceedings being taken against offenders. Food fraud investigations were varied and included:

- Illegal slaughter and cutting of meat
- Sale of meat on social media though an unregistered source
- Breaches on protected Designation of Origin
- Mislabelling of meat and poultry
- Protected disclosure from a food laboratory
- Fatality from the consumption of methanol
- Illegally description and sale of wine as prosecco
- Misleading sale of craft beers and counterfeit wine.

One notable case in the mis-labelling of meat related to six offences of falsely declaring Irish origin of beef imported from Poland, Lithuania or Germany; the application of false Irish slaughter and cutting plant codes used on packaging labels and having an inadequate beef traceability plan. The company concerned was fined and contributed to costs (FSAI, 2017).

6.2. General food safety concerns

6.2.1. Rapid Alert System for Food and Feed (RASFF)

The RASFF system records incidents associated with food and feed. As previously, the main hazard categories associated with food incidents (352 notifications) are typically microbiological (pathogenic microorganisms, mostly in food of animal origin) or chemically related (RASFF, 2016a). A number of recalls however are associated with mislabelling often in relation to the presence of undeclared allergens.

The number of notifications made by Ireland decreased slightly from 20 in 2014 to 16 in 2016, the majority (6) relating to pathogenic microorganisms and the main product category dietetic foods, food supplements and fortified foods. (RASFF, 2016a) The main hazard categories notified by Ireland related to aflatoxins, labelling and the presence of Listeria and Salmonella (RASFF, 2016b).

Ireland was the originating country in 41 notifications between 2016 – 2018 of which 11 related to the presence of pathogenic microorganisms in bivalve molluscs and related products, all of which were classed as serious (Norovirus (6), Escherichia coli (1); Shellfish poisoning (4)); Meat and meat products (10) (presence of E. coli or mislabelling); fish and fish products (4); 4 milk and milk products (all serious; Listeria monocytogenes) (RASFF portal)
6.2.2. Food businesses – Local inspections

Sixty-nine Enforcement Orders (including 64 Closure Orders, one Improvement Order and four Prohibition Orders) were served on food businesses in Ireland for breaches in food safety legislation in 2017, declining by over a third (35%) compared to 2016 (106). Enforcement Orders are served on food businesses only when a serious risk to consumer health has been established or where there are a number of ongoing serious breaches of food legislation. The types of recurring food safety issues that lead to Enforcement Orders are: evidence of rodent infestation and rodent droppings; failure to maintain temperatures of foodstuffs; filthy conditions; unsuitable food storage facilities and improper or lack of water facilities. Four closure orders were issued in January 2018.

6.2.3. Microbiological issues

Microbiological foodborne illness remains a concern throughout Europe, especially with the increasing incidences of antimicrobial resistance.

According to the Health Protection Surveillance Centre (HSPC, 2018), in 2016, whilst there were outbreaks of infectious intestinal disease where food was a possible source of transmission these represented a small percentage of the whole (13 outbreaks; 2.6%). Those microorganisms reported as associated with foodborne transmission in 2016 included Acute infectious gastroenteritis (4), Campylobacteriosis (2), Salmonellosis (3), Shigellosis (1), Typhoid (1) and VTEC (3).

In 2014 of all reported food-borne outbreaks in human cases in the EU 20 were reported in Ireland. 134 individuals were involved, resulting in five hospitalisations and zero deaths. The incidence in Ireland was 0.44 per 100,000 compared to an EU average of 1.04 (ECDC, 2015).

Salmonellosis

In Europe there was a slight increase in Salmonella food-borne disease outbreaks reported in 2016 (4,786) in comparison with 2015 (4,362 outbreaks), but the figure is similar to the average number of outbreaks in the EU during 2010–2016. Confirmed human illness cases due to Salmonella had been decreasing since 2008 but are reported to be on the rise, with S. Enteritidis\(^4\) causing one in six food-borne disease outbreaks in 2016. Salmonella bacteria were the most common cause of food-borne outbreaks (22.3%), an increase of 11.5% compared to 2015. They caused the highest burden in terms of numbers of hospitalisations (1,766; 45.6% of all hospitalised cases) and of deaths (10; 50% of all deaths among outbreak cases). Salmonella in eggs continued to present the highest risk target/food combination (1,882).

Ireland however reported one of the lowest rates with a decreasing trend from 2008 – 2016. There was however an increasing trend between 2012-2016 of S. Enteritidis (ECDC, 2017).

Campylobacteriosis in humans

Campylobacter, the most reported food-borne pathogen in humans, was detected in 246,307 people in the EU in 2016, an increase of 6.1% compared with 2015.

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\(^4\) Salmonella enteritidis is the Salmonella serotype responsible for most salmonellosis cases and Salmonella food-borne outbreaks. It had been declining constantly since 2007 when the EU surveillance began and control measures in poultry were implemented.
Despite the high number of cases, fatalities were low (0.03%). Levels of \textit{Campylobacter} are high in chicken meat. Ireland was one of 14 countries reporting significantly increasing trends of Campylobacteriosis between 2008 and 2016, although there was no significant change between 2012-2016 (ECDC, 2017).

Campylobacteriosis is also the most common cause of bacterial food poisoning in Ireland with over 2250 laboratory confirmed cases each year since 2013 (DAFM, 2017c). The bacteria are found in cattle, pigs and poultry although poultry is considered to be the most important source of infection in humans. A campylobacter stakeholder group (farmer-growers, processors, retailers with participation by FSAI, Safefood, Bord Bia, DFAM to provide advice on relevant issues,) has been established to ensure that best practises for the control of campylobacter are adopted and implemented. In an initial baseline study carried out in 2008 (EFSA, 2010) the estimated prevalence for campylobacter in broiler batches was 83.1% and 98.3% in broiler carcasses. (This compared to levels of 75.3% and 86.3% respectively in the UK) Following this the FSAI undertook a review and produced a list of recommendations, although it is reported that many of them have not yet been auctioned (Campylobacter Stakeholder Group, 2017).

\textbf{Plant health}

Microbiological contamination is also of concern in relation to plant health (Primary producers, food of non-animal origin) and shortfalls in this area were identified in a recent Directorate on Health and Food Audits and Analysis audit in March 2016 (see section 6.2.8)

6.2.4. Antimicrobial resistance

Antimicrobial resistance\(^5\) (AMR) has been identified as a global health threat thus the use of antimicrobial agents has come under scrutiny at both EU and national level and, including those used in animal welfare.

Accordingly, DAFM and DOH have launched a National Action Plan on Antimicrobial Resistance which is designed to help with compliance with EU rules when they are implemented (DAFM, DOH 2017; DAFM, 2017c). Under the DAFM/DOH ‘One Health’ strategy a committee has been established to reduce the level of bacterial infections on farms and to ensure antimicrobials are used appropriately (DAFM, 2017c).

6.2.5. Animal diseases

Ireland has a favourable animal health status and is free of many diseases. DAFM published a new National farmed animal health strategy in 2017 which sets out the goals, objectives and strategies for animal health. There are 6.7 million cattle; 4.6 million sheep; 1.5 million pigs; 10 million poultry; 250,00 horses as well as farmed shellfish and finfish and 80% of agricultural output is animal based. Zoonotic diseases are those that are transmitted to man by domestic or wild animals either through direct contact, the environment (including via living animals) or food. Animal welfare is therefore of strategic importance both economically and in protecting human health. The proposed strategy proposes a ‘One

\(^5\) Antimicrobial resistance refers to the ability of micro-organisms to survive in the presence of an antimicrobial agent that in the past was sufficient to kill the micro-organism. The use of antimicrobials in farm production systems has the potential to contribute to the development of antimicrobial resistance in humans as animals and humans are exposed to the same bacteria, and are treated with essentially the same group of antibiotics (DAFM reports 2017)
Health’ and ‘prevention is better than cure’ strategy for interdisciplinary collaboration on health of humans and animals (DAFM, 2017d)

Ireland is free of Brucellosis in sheep, pigs and cattle. There has been no outbreak of Brucellosis in cattle since 2006 and Ireland obtained Official Brucellosis Free (OBF) status in July 2009. As such the testing has been significantly tailed back and there was no Brucellosis Round test in 2015.

Ireland is one of ten Member States yet to achieve officially tuberculosis free (OTF) status and in 2016 received EU co-financing for eradication programmes. National controls and co-financing programmes are in place. It reported an incidence level of 2.9% which is reported to be stable (4,047 – 2016, 4,002 – 2015) (ECDC, 2017). DAFM has set a target for eradication by 2030 and a Tuberculosis Forum is to be developed as part of the overall Farmed Animal Health and Welfare Strategy (DAFM, 2017d).

Bovine Spongiform encephalopathy (BSE) sparked a major food scare that, at the time, led to the formation of FSAI. More recently, although occasional cases do occur (one each in 2017, 2015, 2013 for example) the rate and level of BSE has continued to fall. In May 2008 Ireland was officially recognised as a country with a controlled risk for BSE from the OIE (DAFM, 2017e).

There are also more recent animal diseases including Avian influenza which is present in the EU where there have been outbreaks in poultry and captive birds. In Ireland no outbreaks of Avian influenza were confirmed in poultry although cases were detected in wild birds in 2016/2017 and may be introduced again in the 2017/2018 migratory season (DAFM 2017c).

In addition, there is co-operation with the Northern Ireland administration on animal health issues sharing information at local and national levels on disease control and surveillance and in combating illegal movement of animals and animal products (DAFM 2017c).

6.2.6. Veterinary Medicines and National Control Plan

The incidence of illegal residues in food has been very low for several years. New EU regulations governing veterinary medicines and medicated feedingstuffs are currently under discussion but the proposed amendments are reported not to present a problem for Ireland. Changes to the reporting requirements of EFSA from 1st January 2018 under the National Residue Control Plan will however require major business process and ICT changes to current systems. Work has been going on for some time as well as liaison with state and external laboratories on required changes to their systems (DAFM, 2017c).

6.2.7. Alerts and recalls

The issuing of food alerts and food allergen alerts reflects the seriousness of food incidents, some of which have the potential to cause serious harm to consumers.

Over 3,400 consumer complaints were handled by the FSAI’s Advice Line in 2017, with over a third of those relating to complaints of unfit food. Overall there was an increase of 6% on the number of complaints reported in 2016, whilst the number of complaints relating to the non-display of allergen information increased significantly at 42%. A considerable increase was also noted among complaints relating to incorrect information on food labels at 17%.

All complaints received by the FSAI in 2017 were followed up and investigated by food inspectors.
In 2016 thirty nine (24 in 2017) food alerts were issued – the highest number of food alerts in ten years. Whilst the examples varied widely the 39 food alerts resulted in either product recalls or withdrawals from the Irish market for the following reasons:

- Presence of a foreign body
- Presence of pathogens
- Chemical contamination

In addition, 28 food allergen alerts (30 in 2017) were issued in 2016 with milk, soybeans, eggs and nuts being the allergens most frequently incorrectly labelled/declared in 2016.

The authority dealt with 554 food incidents and consequently a total of 67 food alerts and food allergen alerts were issued in 2016 (FSAI, 2017).

6.2.8. Outcome of Directorate on Health and Food Audits and Analysis audits

Food incidents can be exacerbated by the complexity and length of today’s food supply chain which indicates the need for robust control systems and mechanisms and the need to adapt these in the light of current and previous events.

Ireland has been the subject of a number of Directorate on Health and Food Audits and Analysis audits which resulted in a number of recommendations being made to deal with any shortcomings revealed during the audits. An administrative follow-up audit was conducted in Ireland in 2016 (European Commission, 2017) and subsequently revised based on information received since then from the Irish authorities.

15 audits were conducted during the period 2010 - 2015 plus three general follow up audits. A total of 142 recommendations were put forward of which action has been taken in 118 cases, 16 were closed for other reasons, five are in progress and four remain where there has been no progress. Those that are in progress or where no action has been taken all relate to food of animal origin and predominantly to bivalve molluscs. The main issues identified that still require to be addressed by the Irish authorities include:

- Production and labelling of minced meat
- Live bivalve molluscs – Ensure that decisions in accordance with EU legislation are taken when live bivalve mollusc health standards for microbiological contamination and the presence of biotoxins in scallops are exceeded and that those exceeding the limits are not put on the market.
  
  (This and four other recommendations relating to bivalve molluscs and scallops are being followed up by another Commission service).
- Raw milk calculation of geometric average of raw milk

Follow up of these continues with the Authority and the official agencies.

Subsequent audits and fact-finding missions conducted during 2016 and 2017 for which reports are available have made additional recommendations in relation to:

- Genetically modified organisms where the main shortcoming identified was the lack of laboratory capacity which limits the number of samples that can be analysed and

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6 Recommendations classified as “In progress” or “Action still required” are not considered to require any immediate specific legal or administrative action on part of the Commission. These recommendations remain the subject of monitoring to assess progress. Similarly, the number of such recommendations does not, in itself, indicate the responsiveness of the Competent Authorities or the seriousness of the problems.
the scope of the analysis. As a result potentially non-compliant food may reach the market place.

- Seeds for sprouting – Enforcement actions following the identification of non-compliance were not effective
- Organic production – No effective supervision of controls, high risk operators are not necessarily targeted with additional controls, controls of labels and traceability insufficient, laboratories are not accredited by the CA proving an unreliable basis for enforcement, delayed notification of irregularities to the CA and lack of a national catalogue to ensure harmonised enforcement of organic rules.

Other audit reports conducted during this time, whilst including recommendations, also commented:

"The competent authorities have procedures in place to verify the effectiveness of official controls and carry out audits in order to detect non-compliances and implement timely corrective actions" (Document checks at borders)"

"The system of official controls covered by the scope of this audit have put audit arrangements in place largely addressing the requirements of Article 4(6) of Regulation (EC) 882/2004 and generally taking into account the guidelines in Commission Decision 2006/677/EC. These auditing arrangements provide credible, reliable audit results". (Auditing)

The competent authorities are supported by a well-functioning network of adequately staffed and equipped laboratories”. (Microbial safety)

A previous general follow up audit (2015) had concluded that ‘all competent authorities met could demonstrate that ‘they were capable of identifying issues undermining the effectiveness of official controls and of taking actions to address these issues and thus had measures in place which implemented the requirements of Article 8(3)(a) and (b) of Regulation (EC) No 882/2004’.
7. POSSIBLE ISSUES FOR DISCUSSION WITH THE IRISH COMPETENT AUTHORITIES

**Food fraud**
- ‘Food fraud’ is not defined in legislation but involves those violations of food law which are motivated by the intention to obtain an undue benefit and so can be expected to be driven by market conditions (shortage, price for example). What methods are used to identify those products which may be potential targets of food fraud and have any such been identified?
- Food fraud continues to be an issue for the food and drink industry. Issues of food fraud are varied. What procedures have been amended or specific actions taken following the horse meat incident and how do these help to ensure the integrity of the food chain?
- What challenges may diversification of export and import markets have in relation to food safety?
- Is the reported increase in food alerts a cause for concern? If so why and how are those concerns being addressed?

**Ireland – Control structure**
- What progress has been made in transposing the requirements of the new official control regulations – Regulation (EU) 2017/625?
- Have any potential problems been identified in the implementation of these new official control regulations and if so how will these be addressed?
- Will the implementation of the new official control regulations require any reorganisation of or re-allocation of responsibilities within the current food control system? If so what impact may this have?
- In their strategy and review documents both DAFM and FSAI have referred to reduced staff levels, reorganisation and the requirement to deliver the national food control programme with an improved level of service and reduced resources. What assessment has been undertaken of these changes and is the current control system adequately resourced to ensure continued food safety?
- The control system involves a number of agencies, which may themselves be undergoing change. How is this monitored to ensure that their contracted competencies are not affected?
- Following recent incidences of cybercrime and ransomware and since modern systems and reporting mechanisms (e.g. RASFF, TRACES, FFN) rely on computerised and electronic systems what procedures are in place to ensure cybersecurity and resilience in the event of such an attack?

**Directorate for Health and Food Audits and Analysis**
- What is the status of actions relating to outstanding recommendations following Directorate for Health and Food Audits and Analysis audits.
8. REFERENCES


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• European Commission, (2016e) Directorate on Health and Food Audits and Analysis 2016 Final report of an audit carried out in Ireland from 23 February to 02 March 2016 in order to evaluate the system of official controls relating to the microbial safety of primary production of food of non-animal origin DG(SANTE) 2016-8734 MR

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- ISO International Standards Organisation EN ISO 17025 General requirements for the competence of testing and calibration laboratories
- Rapid Alert System for Food and Feed (RASFF) http://ec.europa.eu/food/food/rapidalert/index_en.htm
- Rapid alert system for food and feed (RASFF) portal https://ec.europa.eu/food/safety/rasff/portal_en
- Regulation (EU) 2017/625 of 15 March 2017 on official controls and other official activities performed to ensure the application of food and feed law, rules on animal health and welfare, plant health and plant protection products http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32017R0625

(All links accessed during February 2018)
NOTES
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