

Standard Setting & Compliance Business Plan – Consumer Assurance

1. INTRODUCTION

During the RMAA conference of 2007 the lack of national standards for the evaluation of abattoirs was highlighted as one of the major reasons for uneven playing fields, lack of consumer assurance in red meat and for the increasing tendency by meat retailers to request independent food safety audits to provide safeguards as to the compliance of abattoirs and deboning plants.

The Association has the responsibility, as the role player responsible for applicable meat safety standards at abattoirs, to ensure national standards within this industry.

2. RMAA: CONGRESS RESOLUTION

The congress requested the RMAA to establish and implement a national evaluation system and to seek approval for provision of this system by the Department of Agriculture, Forestry and Fisheries (DAFF).

The Association wishes to develop and implement the system in conjunction with the national and provincial veterinary authorities.

This decision was taken against the background of:

- The current lack of national standard setting by the DAFF as a result of insufficient staffing and the primary responsibility of abattoir related matters to be vested with the provincial veterinary authorities (with the exception of essential national standards).
- An increased number of external retail audits to ensure acceptable standards
- A lack of technical guidelines to the industry for the implementation of meat safety regulations.
- Increased demand by the consumer to be provided with guarantees pertaining to the safety of meat.

3. BACKGROUND TO THE ABATTOIR EVALUATION SYSTEM

The Meat Safety Act (Act no 40 of 2000) requires an abattoir to be managed in accordance with a prescribed hygiene management and evaluation system as part of the essential national standards (section 11 (1) (e)) of the Act.

The abattoir owner is required, in terms of the Red Meat Regulations (Part III, section 49 (e)), to assess the hygiene status of the abattoir by means of the Hygiene Assessment System (HAS) and to provide this information to the provincial executive officer.

Although the provincial executive officer of each province has received the delegated authority to approve a slaughter facility, do routine inspections or issue instructions at abattoirs, it remains a national responsibility to provide for and evaluate the application of essential national standards at abattoirs.

The Red Meat Abattoir Association (RMAA) requested the DAFF to provide for a national evaluation system in 1999 and assisted in the process of the development of the Hygiene Assessment System (HAS) currently provided for in the regulations.

The Hygiene Assessment System has been adopted by the provinces and the standardized documents attached are being used by all the provinces. (See Annexes A and B).

Provinces are required to do an honest evaluation of existing resources, i.e. manpower, equipment, finances etc to determine whether the goals of legislation can be achieved. In those provinces where ample provision exists,

not much more will be required by the scheme and actual capacity building of personnel in standardised evaluation procedures may already have commenced.

Shortage of staff, transport or time allocated to abattoir visits could compromise the success of the scheme and it is assumed that meat safety is probably already compromised and merits urgent attention by certain provinces.

Since standards at all abattoirs are not the same due to provincial variations of standards, all abattoirs should be audited to ensure the quality of their products. The implementation of the Abattoir Rating Scheme will provide a standardised list of rated abattoirs which will simplify the sourcing of meat. This includes verification audits by die NARS Committee.

4. PURPOSE

The purpose of an abattoir audit in terms of the Hygiene Assessment System (HAS) is to evaluate and rate the statutory compliance of the abattoir to the Meat Safety Act and the applicable red meat regulations, on a national basis.

5. DEVELOPMENT

The Association embarked on provincial workshops with DAFF and the workgroup discussing the participation of the national and provincial veterinary authorities with the respective role players.

During 2010 the NARS Committee developed and communicated the SOP and documentation for the implementation of the National Abattoir Rating Scheme (See Attachment A hereto).

Section 11 (1)(e) of the Meat Safety Act, requires that each abattoir must be managed in accordance with a prescribed hygiene management system (HMS), as described in the regulations, and evaluated according to the Hygiene Assessment System (HAS). Provinces are tasked under the Act to enforce this function and the NEO is tasked to audit all provinces to verify that provincial systems are in fact in place to ensure that all abattoirs conform.

Although HAS checklists are kept up to date by a HAS Committee appointed by the NEO, interpretation of the HAS system may vary between provinces and is subject to discretion of the PEO's and their officers. A scheme promoting a scientific approach using uniform and accepted principles, will elevate the HAS system to the level of a reliable evaluation system with nationally uniform standards. The HAS scores thus obtained could then be utilized to rate abattoirs as described in the proposed National Abattoir Rating Scheme (NARS).

Participation of all provinces in the scheme is essential. All high and low throughput abattoirs will be evaluated under the rules of the scheme and those abattoirs achieving a HAS score higher than a present limit, will feature in a provincial rating process. Abattoirs so identified merit being awarded special ratings of gold, silver or bronze. Rated abattoirs will be made known to the meat industry that may then choose their meat suppliers on a more informed basis. The evaluation scores of unsuccessful abattoirs will not be made public. At a further special event that will be arranged by DAFF, the best abattoir for each category in the country will receive a platinum rating.

Standardising HAS auditing capabilities of provincial officers is necessary to standardise HAS auditing at all abattoirs. The scheme proposes that each province appoint a Provincial Rating Committee (PRC) who will monitor officers who do HAS evaluations at abattoirs in their provinces. By interaction between the NARS workgroup and in future the National Abattoir Rating Scheme Committee (NARSC), provincial PRC's and probably the industry, it will be possible to achieve truly uniform standards. The convener or chairperson of each PRC will also serve on the NARSC which will be appointed by DAFF.

The ITCA (VWG) selected a National Abattoir Rating Scheme workgroup to pro-actively inform provinces regarding the intentions of the proposed Abattoir Rating Scheme, what it proposes to establish, what is required of the Provinces. (See Annex C)

This workgroup is tasked to assist Provinces where needed to implement the Scheme once it has been approved and established by the Minister.

Training embarked on by the workgroup:

- Explain the basic operations of the proposed Scheme in full during a presentation and discussion session to Officers from Director Level, where possible, to VPH officers that regularly visit abattoirs. All relevant documents are explained fully and copies of all documents are provided.

- Visit a number of abattoirs with key provincial personnel to explain and practice HAS evaluations in order to standardize the application of the HAS system.

The establishment of a Provincial Rating Committee as required by the Scheme is promoted by the National Abattoir Rating Scheme workgroup in all provinces. Such provincial Committees are essential to test and interview all officers in their provinces to ensure that all officers are capable of performing a HAS evaluation to the same level as their colleagues.

Certain administrative aspects of HAS evaluations and record keeping is explained and hard copy manuals provided. A key administrative function of the Provincial Rating Committee is to analyse the HAS results of their province and select the winning abattoirs in each category.

The proposed National Abattoir Rating Scheme was published of comment – Government Gazette 5 April 2013 Notice 341 of 2013 (No. 36307). The Forum and the RMAA approved of the proposed National Abattoir Rating Scheme (NARS). They also approved the implementation of a scheme to rate abattoirs to their level of compliance to the requirements of the Meat Safety Act and the regulations promulgated there under as measured by the Hygiene Assessment System (HAS).

6. IMPLEMENTATION

The successful implementation of the NARS is dependent on legal compliance by the abattoirs to meeting requirements for meat safety standards and uniform standards of the HAS. Technical standards are provided by the industry to ensure a full understanding of technical and legal aspects related to the compliance of the Meat Safety Act and related legislation.

Internal audits are provided by abattoir management on a monthly basis. Training and technology transfer to responsible persons ensure the proactive identification and correction of non-conformances in preparation of a HAS audit by the department.

The provincial inspector is responsible for the validation of the monthly HAS report by way of his own audit, a sampling evaluation of a particular section of the abattoir at least every three months.

Training

The Association present training to government officials and internal auditors on HMS & HACCP, Audit principles and regulatory requirements to ensure minimum standards.

With the approval of the Department of Agriculture, Forestry and Fisheries: Directorate Animal Health, the Red Meat Abattoir Association (RMAA) will facilitate the provincial audits and audit meetings to provide feedback to the NARS Committee twice a year or as may be required.

Verification Audits (Annex D)

Verification audits are performed when RMAA officials visit abattoirs and verify previous audit findings whether it be from government or from other auditing bodies. These audits are also performed as part of the National Abattoir Rating Scheme (NARS) project. Aspects covered during Verification Audits include: Previous audit scores and findings/ non-conformances (corrective actions that have already been completed is recorded), laboratory sampling program, HMS procedures & records, Ante Mortem & Meat Inspection and a Walk-Through Audit.

The Association will provide a lead auditor(s) as registered at SAATCA and qualified auditors to facilitate/ assist provincial Hygiene Audit Committees to:

- Provide a verification audit at a minimum of 10 % of all abattoirs
- Provide follow-up audits of facilities with critical non-conformances as identified by the provincial inspector which has not been rectified within three months.
- Provide a database of audit results on a quarterly basis to the DAFF
- Provide for independent microbiological verification from time to time as may be required to substantiate audit results.

The lead auditor or his representative shall be accompanied by the provincial inspector and the meat inspector or his representative (may be a supervisor) during these audits.

7. REQUIREMENTS FOR AUDITORS

All inspectors and /or veterinarians, internal auditors responsible for the audits must:

- Have applicable qualifications in meat safety
- Have undergone applicable training in the red meat regulations, hygiene management systems and auditing.
- Have applicable practical experience in this field
- Be equipped with a calibrated light meter and thermometer
- In the case of the lead auditors be registered with SAATCA for this purpose.

8. COSTING (each category includes personnel, transport and accommodation)

Audits & Verifications	R 98 920
Management and facilitation	R 15 990
Provincial and national meetings	R 21 320
Technology Transfer in HAS & HACCP & Auditing	R 67 717
Microbiological verification / Residue Monitoring	R 106 600
Technical standards	R 26 650
Administration (5%)	R 16 850
TOTAL	R 354 047

The Association applies for the funding of **Standard Setting and Compliance for Consumer Assurance** to the amount of R 354 047 per year in order to implement the National Evaluation Scheme for Abattoirs to ensure compliance and standards at red meat abattoirs in the country. This amount will increase by 6 % per annum during the duration of this statutory measure.

Shortages to this budget will be sourced from the industry or possibly the department in view of the decision not to allocate further abattoir contributions to this project. In view of the decision not to extend on functions of this statutory application. The abattoir industry will continue to fund the statutory requirements related to Independent meat inspection, meat classification and meat classification coordination.

In lieu of above the Association requested the committee to consider any discretionary funding which may become available during the duration of the statutory measure, towards this project.

The Association is prepared to present further background or any information as deemed to be necessary to the Committee. Reporting will be provided to the Compliance Committee of the Meat Industry Forum at least twice a year, or as may be required.

Kind regards



DR GERHARD NEETHLING GENERAL MANAGER:
RED MEAT ABATTOIR ASSOCIATION

Annex A - Standard operating procedure for the National abattoir rating scheme Annex B - Hygiene Assessment System Checklist

Annex C – NARS Committee

Annex D – Verification audits document