

Chapter 2.10

Inspection and Attendance

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1. Official Veterinarian Attendance

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1.1 Introduction

1.1.1 Objective

This document sets out guidance to enable Veterinary Advisors to identify **slaughterhouses** and **game handling establishments (GHEs)** that may be eligible for low-capacity designation. This would enable the plants to benefit from less Official Veterinarian (OV) attendance, with PMI conducted under the responsibility of an OV or by an OV.

1.1.2 Legislation

Article 7 of Commission Delegated Regulation 2019/624 allows PMI to be carried out under the responsibility of the OV (i.e. the OV not being in plant during PMI) on the basis of a Risk Assessment (RA) if the plant operates discontinuously and has a low throughput (TP). However, an OV should still be inspecting the plant every operational day (amongst other conditions).

Also, if the plant is both discontinuous and with a low TP (according to set thresholds), Article 13 of Commission Implementing Regulation 2019/627 allows PMI to be delayed by a maximum of 24 hours from slaughter or arrival of game carcasses in the AGHE providing that there are sufficient storage facilities within the establishment and an OV undertakes the PMI.

1.2 Attendance general issues

1.2.1 Definitions

Discontinuous slaughter activities – activities do not take place continuously (i.e. all day, every day). only during part of the working day or during the whole working day but not on each working day of the week.

Low Capacity slaughterhouse/ Game Handling Establishment- means premises designated by the competent authority on the basis of a risk analysis and in which slaughter takes place only during part of the working day or takes place during the whole working day but not on each working day of the week.

Full time attendance – the OV is required to be continuously present at the premises throughout operations that require OV presence (i.e. ante and post-mortem inspection).

For the purposes of attending a low capacity establishment, EU regulations permit reduced OV presence on the basis of a risk assessment which shall cover public health, animal health and welfare considerations.

1.2.2 Business Agreements

The Business Agreement (BA) meetings between FSS and Food Business Operators (FBOs) capture the service requirements for official controls. This guidance will help assess these service requirements and best options for delivery.

BAs must capture the premises designation arrangements agreed with the FBO, with all other relevant Business information in the comments section of the BA template. FSS Operations Managers (OMs) should also capture any other possible flexible start/finish times of the OVs. Following discussions, the OM will complete the BA and send it to the FBO within 5 working days accompanied by a covering letter of what was discussed and agreed.

1.2.3 Inspection tasks

The OV must be allowed sufficient time to carry out the inspection tasks required by Regulation 2017/625.

In relation to attendance for PMI being carried out under the responsibility of the OV, Regulation 2019/624 Article 7 states the following criteria to be met:

- the slaughter or game-handling activities are carried out in a low-capacity slaughterhouse or game-handling establishment which slaughters or handles:
 - (i) less than 1 000 livestock units per year; or
 - (ii) less than 150 000 poultry, lagomorphs and small wild game per year;

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- the establishment concerned has sufficient facilities to store meat with abnormalities separately from other meat until the official veterinarian can inspect the meat with abnormalities in person;
- the official veterinarian is present in the establishment at least once a day, including regularly during slaughter activities;
- the competent authority has put in place a procedure to assess on a regular basis the performance of official auxiliaries in these establishments, including:
 - monitoring individual performance;
 - verifying documentation on inspection findings and comparing it with the corresponding carcasses;
 - checks of carcasses in the storage room;
- a risk analysis has been carried out by the competent authority, taking at least account of the following elements:
 - the number of animals slaughtered or handled per hour or per day;
 - the species and class of animals slaughtered or handled;
 - the throughput of the establishment;
 - the historical performance of slaughter or handling activities;
 - the effectiveness of any additional measures in the food chain taken to guarantee the food safety of animals intended for slaughter;
 - the effectiveness of the hazard analysis and critical control point (HACCP)-based procedures;
 - audit records;
 - the competent authority's historical records of ante-mortem and post-mortem inspections.

1.2.4 Risk Assessment

Regulation 2019/624, Article 7 describes the criteria and conditions for the performance of PMI under the responsibility of the OV referred to in Article 18(2)(c) of Regulation 2017/625.

In order for the Approved Game Handling Establishments (AGHEs) or Slaughterhouses (SH) to benefit from PMI by OAs (still require daily OV attendance) or the derogation of PMI within 24 hours from arrival, the establishment needs to be designated as '**low capacity**' and handle fewer than 1,000 Livestock Units (LSU) or fewer than 150,000 poultry, lagomorphs and small wild game per year. Seasonal establishments within this throughput threshold will also have the possibility of being designated as 'low capacity'.

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Designations will be carried out by or as delegated by the VAs.

To designate an establishment as low capacity a **risk assessment** needs to be carried out. This will be conducted by an OV, VA or Vet Auditor.

The template can be found at [Annex 1](#).

For the purpose of the assessment FSS will agree a date with the FBO to conduct the visit.

The following areas will be assessed to designate as low capacity:

- Available facilities to store meat with abnormalities for the OV to further inspect;
- TP;
- Working pattern;
- Historical performance;
- Effectiveness of HACCP;
- Audit records;
- Previous records of AMI and PMI findings;
- OV presence arrangements;
- PMI arrangements;
- Procedures in place to assess performance of OA/OVs.

Please note: 'Under the responsibility of the OV' means that the OV assigns the performance of post-mortem inspection to an OA without the need for the OV to be present at the establishment during the performance of this task.

Delayed PMI can only be carried out by the OV (Regulation 2019/627, Article 13).

1.3 Designation as low capacity

1.3.1 FBO role

FBOs wishing to apply for the designation need to discuss their eligibility with their FSS OV in the first instance during FSS-FBO team meetings, and they will then escalate it to the VA who will discuss it with OMs. A formal assessment will be triggered by the VA and the process described in the next section will be followed.

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1.3.2 VA/OV role

Process for Low Capacity plant assessments to establish OV Attendance (PMI by OAs or Delayed PMI by an OV)	
1	VA/ OV agrees a date with the FBO and visits the premises to carry out the assessment.
2	VA/ OV provides the FBO with an indication of the outcome of the assessment.
3	VA/ OV completes the Assessment form and includes their recommendation (either authorising the reduced OAs attendance / delayed PMI by an OV, not authorising it, maintaining a previous authorisation or removing a previous authorisation) and any relevant comments following discussion with the FBO in the box provided in Section 5 of the Assessment form.
4	VA/ OV informs the Head Veterinarian in the first instance, then the Area Operations Manager (OM) / Head of Operational Delivery (HOD) about the recommendation, in writing (a copy of the Assessment/Post-assessment form should also be provided).
5	If changes are required to the pattern of attendance or BA, the OM discusses the attendance requirements with the VA, notifies the FBO, agrees the date for implementation and reviews the Business Agreement (BA). OM informs the VA & relevant field staff of the new agreed BA, including the date to start implementation.
6	VA/ OV updates the date for implementation in the assessment form, files a copy of the completed Assessment form in the establishment folder on SharePoint and sends a copy to the Approvals mailbox (Approvals@fss.scot) for monitoring purposes. Establishment Database to be updated with the outcome.
7	Four weeks after implementation, VA/ OV reviews initial form. If the authorisation is removed, the VA/ OV will reflect this in the relevant section of the Assessment form and will follow steps 4 to 6. If the post-implementation assessment is favourable the VA/ OV will follow only step 6 and also inform the Head Veterinarian.
8	Going forward, VA/ OV reviews the assessment once a year from the implementation date or when triggered due to changes in the establishment (for example: significant changes in operating hours, poor audit outcome,

drop in hygiene or animal welfare standards, changes to operational procedures, increase on throughput etc.).

1.3.3 Appeals

Appeals by the FBO against the actions of the OM with regards the BA should be made through the Business Agreement appeal system, as detailed in the charging guide.

1.4 Monitoring establishments designated as low capacity

1.4.1 Monitoring

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

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

As part of FSS monitoring, the VAs and Vet Auditors are required to carry out three types of assessments:

1. on-going annual review – this will be done for the low capacity designated establishments at the time of the VA/OV annual reality check.
2. **triggered assessment – to be carried out by the VA/Vet Auditor/OV, if there is evidence that an establishment no longer fulfils the criteria to maintain the designation (based on audit outcome, compliance history or changes to operational procedures) following the intervention protocol process as per Chapter 7; the VA/OV should complete the assessment form and upload it to the local SharePoint site.**

1.4.2 Assessment of performance of official auxiliaries

The performance of OAs deployed in establishments designated as low capacity should be regularly assessed by the OV as follows:

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

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

1.5 Review/ Removal of Low Capacity designation

1.5.1 Review

The low capacity designation can be reviewed if the VA/OV identifies during routine monitoring sufficient evidence that requirements for low capacity may no longer be met. Following a risk assessment, the VA can recommend increasing the level of attendance (including complete withdrawal of designation). In those cases the VA/OV should follow the process steps below.

Note: The OV hours will be reviewed at each Business Agreement meeting.

1.5.2 Process steps

The table below details process steps that should be followed during the review of low capacity designation by the VA:

Process steps	
1.	Outcome of VA/OV assessment or monitoring indicates that the requirements for low capacity designation are not met.
2.	OV discusses the outcome of the visit and evidence gathered with the relevant VA
3.	VA informs the OM, HV and HOFO about the recommendation to increase attendance, or withdraw low capacity designation, in writing
4.	OM notifies FBO and agrees BA
5.	VA updates the Establishments Database

1.5.3 Appeals

Appeals by the FBO against the decision of the OM should be made through the Business Agreement appeal system.

2. PIA System

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2.1 Introduction

This section outlines a standardised process to assess suitability of poultry slaughterhouses to use Poultry Inspection Assistants (PIAs) to carry out official control duties. Details of the process to authorise individuals as PIAs can be found in Chapter 10 – Operational training.

2.2 Legislation

Regulation 2017/625 Article 18, Paragraph 3 states that Competent Authority may, on the basis of a risk analysis, allow slaughterhouse staff to assist in the performance of tasks relating to the official controls referred to in paragraph 2 in establishments slaughtering poultry or lagomorphs, or, in establishments slaughtering animals of other species, to carry out specific sampling and testing tasks relating to such controls, on certain conditions.

2.3 Assessment arrangements

FSS must demonstrate that it has a standardised and robust system in place to assess those premises wishing to move from a OA to a PIA system. This is known as an Establishment Permit Assessment that can be found at [Annex 3](#).

The FBO will have to demonstrate an effective food safety management system (FSMS) for the OV to make a favourable recommendation to the Vet Advisor, for approval.

FSS is responsible for carrying out a risk assessment on those premises wishing to implement a PIA system, to confirm that they have a robust HACCP-based FSMS in place. This is done through the “Establishment Permit Assessment”, for further information about it, go to [Section 2.5](#) in this chapter.

2.4 Roles and responsibilities

2.4.1 Head Veterinarian

The Head Veterinarian (HV) is the owner of this process, with the Veterinary Advisors (VA) having responsibility for all technical aspects.

2.4.2 Operations Manager

The decision making process will take place at a business area level. OMs, with the ultimate support of the HOFO, will manage operational implications and will determine timescales for introduction of any changes, in consultation with the FBO and Vet Advisors. Human resources colleagues will provide support on staffing issues.

2.4.3 Veterinary Advisors

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

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

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

The VA will also carry out the establishment assessments or provide advice to the OM/HOD on the best course of action if technical issues arise.

2.4.4 Approvals Team

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

2.4.5 Official Veterinarian

The Official Veterinarian (OV) is responsible for PIA assessments and constant monitoring of their performance. Where PIA performance is found to be inadequate, the OV should record the findings on the form PIA PM-1 at [Annex 2](#).

2.5 Establishment permit assessment

2.5.1 Introduction

The "Establishment Permit Assessment" will be carried out at each plant requesting the use of PIAs (PIA 4 at [Annex 3](#)). There are three different scenarios:

- Plants using OAs wishing to move to PIA system – the assessment is based on previous FBO compliance. Provided there is sufficient evidence of an effective FSMS based on HACCP principles, following the favourable recommendation by the OV and VA approval, a PIA system can be implemented. For more information [please refer to section 2.10](#)
- Plants approved to use PIA system wishing to move to new premises or changing ownership – FSS may permit, on a case by case basis, the introduction of the PIA system in the new establishment, based on compliance of previous premises/FBO and evidence gathered during the re-approval process. The method of assessment will be tailored to each plant. For more information please [refer to section 2.11](#)
- Newly approved establishments with no previous history of PIA systems in place - the assessment requires the FBO to provide evidence of an effective FSMS based on HACCP principles which in this case will be assessed part of the approval process

In order to ensure a consistent approach, for those premises already using PIAs, assessments must also be completed on their suitability to continue with PIA systems. This is known as an establishment monitoring assessment. This assessment should be based on FBO food safety management systems, PIA performance and capability of the PIAs to address hygienic and process issues. The required establishment PIA

assessment is separate to the approval assessment that will already have been completed in poultry slaughterhouses. For more information please go to [Section 2.6](#) in this chapter.

2.5.2 Notify OM

An FBO should make a request to transfer to a PIA system to the OM, who should inform the VA at the earliest opportunity. The OM will need to consider staffing implications and impact on existing FSS staffing at the premises.

2.5.3 VA action

The VA must visit the establishment and complete relevant parts of the 'Assessment of PIA systems in poultry slaughterhouses' PIA 4 form ([Annex 3](#)). A technical decision is required on whether the necessary systems are in place. This assessment should be completed in accordance with deadlines established by the Vet Advisors and OM (in consultation with the FBO).

2.5.4 Suitable outcome

In this instance the OM and VAs will discuss timescales and operational management of the process with the FBO.

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

2.5.5 Unsuitable outcome

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

After the further assessment has been completed, the VA should notify the FBO and OM of the outcome and email a copy of the completed PIA 4 form to the Approvals Team for information and filing. The Approvals Team should update the central record of assessed establishments and send a copy of the report to the FBO.

2.5.6 Appealing the outcome of a refused establishment permit assessment

Where the FBO does not agree with the Vet Advisor decision, they may appeal to the Head Veterinarian (HV). The HV is responsible for appointing a VA from a different area as an Investigating Officer.

The Investigating Officer will have 14 days to gather the required evidence, conduct the investigation and submit a report with findings and conclusions to the HV.

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

Upon completion of the investigation the HV will advise the FBO of the outcome of the appeal in writing.

2.6 Establishment monitoring assessment

2.6.1 Monitoring

Following the implementation of the PIA system, in order to ensure a consistent approach, assessments must continue to be completed regularly on the establishment's suitability to benefit of PIA systems. This is known as the "Establishment Monitoring Assessment".

The establishment monitoring assessment will be recorded in the same form for Establishment Permit Assessment (PIA 4 in [Annex 3](#)) but selecting the option for an FBO that is already using the PIA system.

This assessment should be based on the effectiveness of the implementation of the FBO's FSMS, PIA performance and capability of the PIAs to address hygiene and process issues.

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

At least one plant assessment should be carried out by VAs per year.

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

Where the VAs already has a good knowledge of the establishment, it may be possible to complete the monitoring assessment as a desktop exercise, in consultation with the establishment OV.

2.6.2 Suitable outcome

The establishment is considered suitable to continue with its PIA system. In this instance, the Vet Advisors will complete the establishment assessment PIA 4 form at

[Annex 3](#) and discuss their findings and decision with the FBO, also informing the OM of the outcome. A copy of the PIA 4 form should be sent to the Approvals Team.

2.6.3 Minor deficiencies outcome

The establishment has minor deficiencies that must be addressed to allow the FBO to continue using PIA systems. The VAs should advise the FBO in writing on corrective actions that are considered necessary to ensure that the PIA inspection system can continue. The Vet Advisors should also agree a reasonable timescale for the completion of such actions.

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

2.6.4 Major deficiencies outcome

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

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

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

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

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

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

The OM will need to consider operational implications, and should liaise with their HOD and VA as appropriate. A copy of the PIA 4 form should be emailed to the Approvals Team

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

2.7 Withdrawal of establishment PIA permit

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

1. VA communicates to the FBO the deficiencies identified during the monitoring assessment and provides a timeframe for rectification. All identified issues and non-compliances have to be communicated to the local FSS management (OM, HOD, HV) at the same time.
2. VA is required to reassess the establishment within the agreed timeframe to evaluate improvement.
3. VA must communicate the outcome of the second assessment to the FBO and confirm the suitability of the PIA system or recommend to the HV the withdrawal of establishment PIA authorisation if the observed improvement was not satisfactory.
4. Findings of the reassessment and recommendation made by VA must be discussed within the local FSS OMT. Sufficient evidence supporting the recommendation should be presented to the HV.
5. HV assesses the evidence and advises the FBO and the local FSS team in writing of his decision.

2.8 Hybrid PIA/FSS systems

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

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

2.9 TUPE considerations

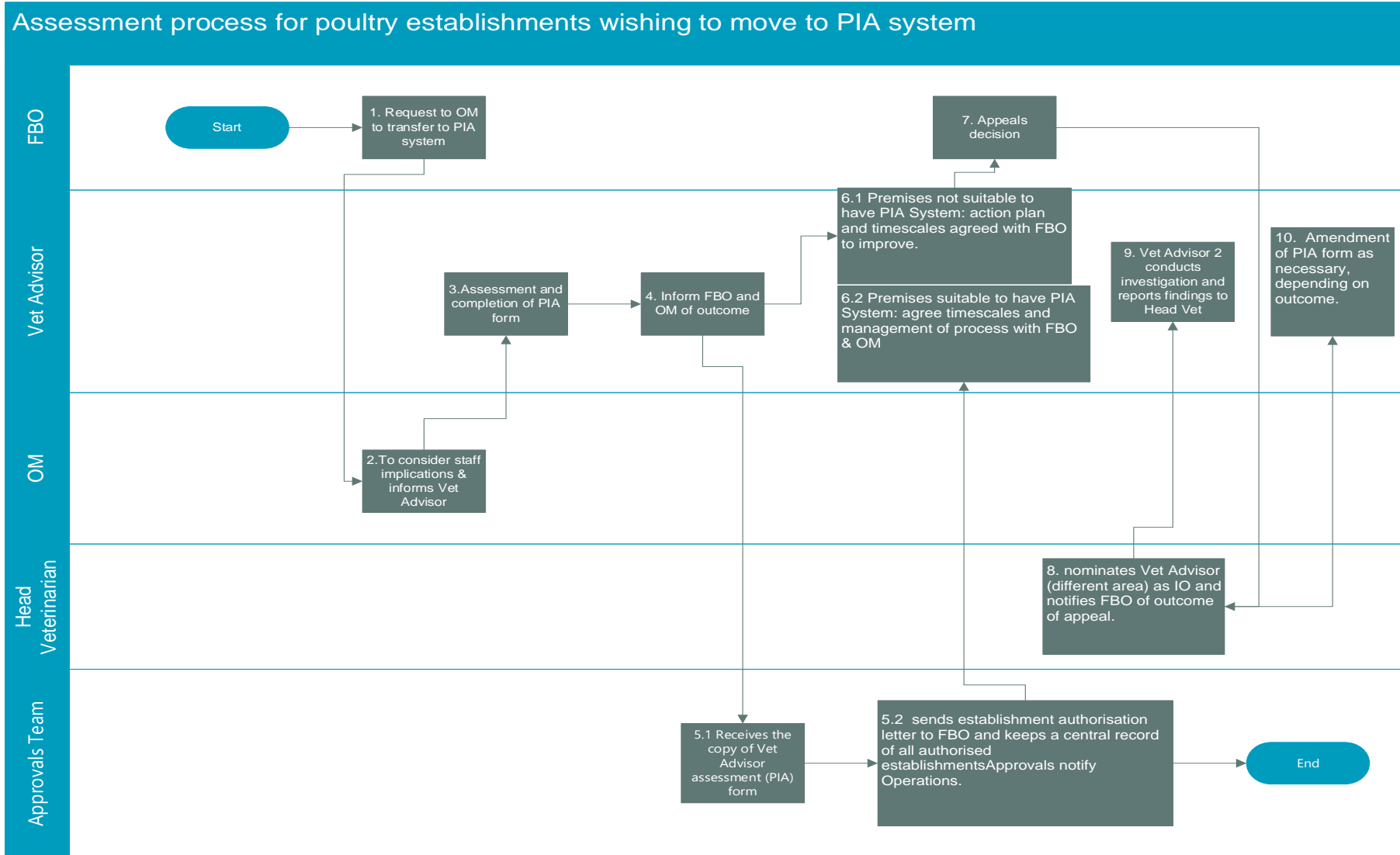
The Transfer of Undertakings (Protection of Employment) (TUPE) 2006 Regulations preserve employees' terms and conditions when a business or undertaking, or part of one, is transferred to a new employer. FSS has received legal advice that the transfer from FSS OAs to PIA systems (or reverse) could be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

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

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

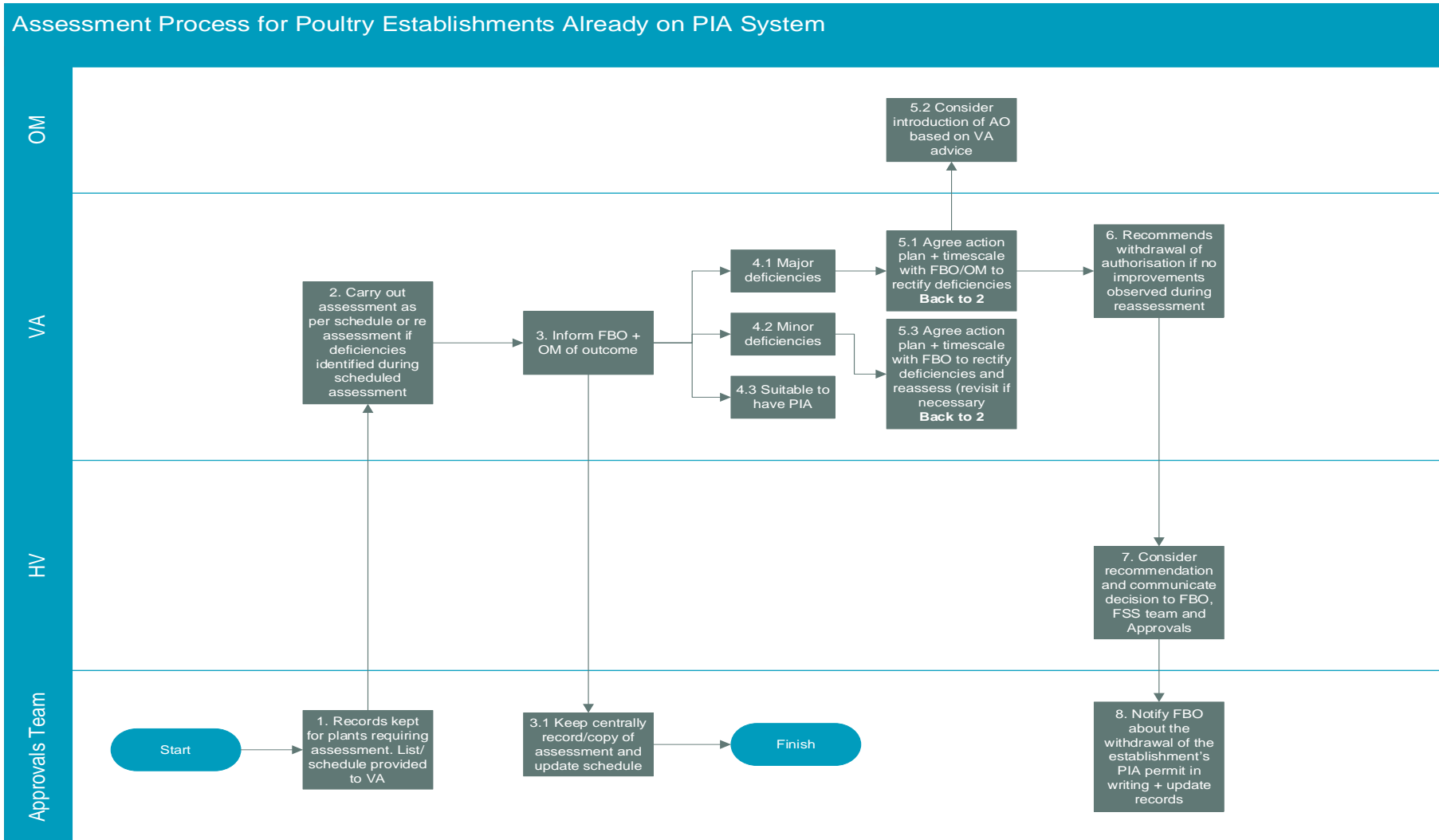
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2.10 Assessment process for poultry establishments wishing to move to PIA system



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2.11 Assessment process for poultry establishments already on the PIA system



3. Annexes

- Annex 1 Low Capacity Designation Risk Assessment
- Annex 2 PIA performance monitoring (PIA PM-1)
- Annex 3 PIA – assessment of PIA systems in poultry slaughterhouses (PIA 4)