
3 Agriculture: Meat Inspection Program

Summary

The meat inspection program includes two key activities to help ensure the safety of meat (both unprocessed and processed) sold in the province: the inspection of all animals slaughtered, and the audits of facilities such as slaughterhouses and meat processing plants. Animal inspections are completed as required. However, the Department of Agriculture is not doing an adequate job of managing the facility audit process. As a result the audit process is not sufficiently effective in mitigating all public safety risks associated with the slaughtering and processing of meat.

The majority of the findings and recommendations in this Chapter relate specifically to the facility audit process. We believe the process lacks fundamental elements necessary to help ensure its effectiveness. We found facility audits are not being completed at the monthly frequency required by management. We are concerned that appropriate action is not being taken by inspectors to ensure deficiencies are corrected in a timely manner. Management are not providing appropriate policy guidance to inspectors in many important areas including conducting, reporting, and following up facility audits, and rating the seriousness of deficiencies. We believe that the lack of procedural guidance has resulted in inconsistencies in practices.

Management do not have sufficient information to adequately monitor and oversee program operations. Management do not know whether audit processes are operating as designed and are effective in managing risks. For example, management do not know whether required facility audits are conducted and whether identified deficiencies are addressed in a timely manner. There is no quality assurance process in place to help ensure inspectors are performing all their regulatory responsibilities appropriately.

Overall, enforcement of the program, with respect to facilities, is weak and needs improvement.

3 Agriculture: Meat Inspection Program

Background

AGRICULTURE: MEAT INSPECTION PROGRAM

- 3.1 The Food Safety section of the Food Protection and Enforcement division of the Department of Agriculture administers the Nova Scotia meat inspection program. The program's objective is to ensure that meat slaughterhouses and processing plants produce products that are safe for human consumption. The Meat Inspection Act and regulations provide the regulatory framework under which slaughterhouses and meat processing plants must operate. The program regulates certain aspects of the meat production and processing industry through a series of animal inspections and facility audits.
- 3.2 A licence is required for a business to slaughter animals and process meat and meat products. Responsibility for meat inspection within the province is shared by the federal and provincial governments. The Nova Scotia meat inspection program is responsible for all meat slaughtered and sold within the province. The federal government is responsible for inspecting all meat that crosses provincial and international boundaries.
- 3.3 Facilities licensed under the provincial meat inspection program are not permitted to slaughter animals unless a provincial meat inspector is present. The animals slaughtered must be inspected to ensure the meat is safe for human consumption. In addition, facility audits are completed to assess compliance with legislation and to ensure facilities maintain an environment that promotes meat safety such as the sanitary condition of the plant. Meat inspectors visit certain facilities (those that slaughter animals) on a regular basis to conduct inspections of the slaughtering process and complete periodic audits of the facility. Other facilities which are only meat processing plants (do not slaughter animals) are visited periodically to conduct audits.
- 3.4 There are currently 14 meat inspectors in the program. They are responsible for monitoring 28 slaughterhouses and 14 meat processing plants. The meat inspection program regulates the processing of a number of different types of animals including hogs, poultry and cattle but does not include fish processing. During 2010, 132,848 animals were slaughtered in the facilities monitored by the program. Not all facilities are open for slaughtering every day. During 2010, slaughterhouses were open an average of 66 days per year.

Audit Objectives and Scope

- 3.5 In the spring of 2011 we completed a performance audit of the meat inspection program. The audit was conducted in accordance with Sections 18 and 21 of the Auditor General Act and auditing standards established by the Canadian Institute of Chartered Accountants.
- 3.6 The purpose of this audit was to determine whether safety risks to the general public associated with the slaughtering and processing of meat are adequately managed by the Department under the meat inspection program. We are not providing a conclusion on whether meat inspected under the program is safe for human consumption.
- 3.7 The objectives of this audit were to determine whether the Department:
- has adequate management processes and information to ensure they are effectively and efficiently managing their responsibilities related to slaughterhouses and meat processing plants; and
 - is adequately monitoring and enforcing operator compliance with legislation and policies in slaughterhouses and meat processing plants.
- 3.8 Generally accepted criteria consistent with the objectives of this audit do not exist. Audit criteria were developed specifically for this engagement using both internal and external sources. Criteria were accepted as appropriate by senior management of the Department.
- 3.9 Our audit approach included interviews with management and staff; documentation and observation of systems and processes; testing of inspection and facility audit processes and procedures; and examination of legislation, policies, and any other documentation deemed to be relevant. Our testing period was primarily April 1, 2009 to December 31, 2010 but we did go beyond this period for prior and subsequent facility audits in some cases.

Significant Audit Observations

Animal Inspections

Conclusions and summary of observations

Inspectors are inspecting all animals slaughtered as required by legislation.

- 3.10 *Inspections* – Legislation requires that a provincial meat inspector be present at facilities when animals are slaughtered. Inspectors oversee the slaughter and perform inspections of animals both before and after slaughter to determine if the meat is suitable for human consumption. Based on our examination of relevant documentation as described in the Program Management section of this Chapter, we found that inspectors are present at facilities when animals are slaughtered.
- 3.11 *Use of veterinarians* – According to the regulations, there are certain circumstances during an inspection process in which a veterinarian should be involved in the decision of whether meat is safe for human consumption. These regulations were passed in 1990 and management said they are outdated. As a result, there are inconsistencies between the regulations and the program policies and procedures.

Recommendation 3.1

Department of Agriculture management should update the regulations to reflect the current operating procedures of the Nova Scotia meat inspection program.

Monitoring of Facilities and Enforcement

Conclusions and summary of observations

The Department is not adequately monitoring slaughterhouses and meat processing plants including ensuring legislative compliance. Although we acknowledge that inspectors are regularly present in some of the facilities, this does not negate the need for adequate facility audits. We noted a number of areas where improvements are required. Facility audits are not being completed at the monthly frequency required by management. We are concerned that appropriate action is not being taken by inspectors to ensure deficiencies are corrected in a timely manner. Sufficient policy guidance has not been provided to inspectors in many important areas. These areas include conducting, reporting, and following up facility audits, as well as assessing the nature and seriousness of deficiencies. We believe that the lack of procedural guidance to inspectors has resulted in inconsistencies in practices.

- 3.12 *Lack of operational policies and procedures for facility audits* – Management have not developed policies and procedures supporting key aspects of the facility audit process. Policies and procedures are important to ensure inspectors are aware of what is required and to ensure there is a consistent approach. The following paragraphs describe several areas in which policy and procedure development is required.
- 3.13 *Assessing seriousness of operational deficiencies* – There is no policy in place to guide inspectors in assessing and rating the seriousness of operational deficiencies identified during facility audits. Inspectors are required to assign a severity rating to each deficiency identified during an audit. Ratings include: 1 (minor), 2 (must be corrected immediately), or 3 (discontinue use until corrected). Based on interviews with inspectors, higher numbers mean more severe deficiencies. Ratings are assigned based on the inspector’s judgment. The seriousness of deficiencies should be an important consideration in deciding when deficiencies must be addressed and how quickly follow-up should occur.
- 3.14 Of the 133 deficiencies examined during our testing, we noted 11 deficiencies from seven reports, with no severity rating. If ratings are not assigned, the facility may not have an adequate understanding of the seriousness of the deficiency and may not correct it in a timely manner.
- 3.15 There was no evidence in the audit reports to support consistent ratings. For example, what appeared to be the same cleaning deficiency was assigned a 2 on one audit report versus a 1 on a subsequent audit report for the same facility. Without additional details, it is not possible to assess if the difference in rating was justified based on the extent of cleaning required or if the rating was inconsistent. If inspectors are using a rating which appears to be inconsistent based on a previous audit report, they should document the rationale for the rating used.

Recommendation 3.2

Department of Agriculture management should develop and implement a policy to guide inspectors in assigning and documenting severity ratings for deficiencies.

- 3.16 *Compliance dates* – Currently there is no requirement that inspectors provide a compliance date for the correction of deficiencies noted in audit reports. In addition, no guidance is provided to aid inspectors in determining the appropriate amount of time for a deficiency to be corrected. A compliance date would help ensure that owners correct deficiencies in a timely manner. Management indicated that inspectors may provide some compliance dates verbally. According to inspectors, a rating of 3 means that a deficiency would have to be corrected immediately so a date would not be required for

this rating. We examined a sample of 133 deficiencies and found that 126 did not have compliance dates documented. 62 of these deficiencies were rated a 2 and 49 were rated a 1.

Recommendation 3.3

Department of Agriculture management should require inspectors to provide a compliance date for addressing all deficiencies.

Recommendation 3.4

Department of Agriculture management should develop guidance for inspectors to use when assigning compliance dates to deficiencies.

3.17 *Follow-up of deficiencies* – Ensuring deficiencies identified are appropriately addressed in a timely manner is critical to the effectiveness of the facility audit process. There is no policy regarding when inspectors should follow up deficiencies. The timing is left to the judgment of inspectors. Inspectors interviewed were consistent in stating that the timing of follow-up should depend on the severity of the deficiency.

3.18 There is no requirement for inspectors to document when they follow up deficiencies, the results of the follow-up, and when the deficiency was corrected. The current practice is to assume that if a deficiency is not identified on a subsequent audit, then the deficiency was corrected. However, it is not known when the deficiency was followed up and when it was actually corrected. Inspectors interviewed indicated that they follow up deficiencies but were inconsistent in whether they document the correction of a deficiency.

3.19 There was no evidence of follow-up on any of the 133 deficiencies in our sample. For eight of these deficiencies, the subsequent audit report noted the deficiencies were corrected but not whether these were completed in a reasonable amount of time. The documentation of follow-up and correction dates would allow management to monitor the timeliness of follow-up and correction of deficiencies. It would also highlight repeat deficiencies that may exist. Delays in correcting deficiencies could potentially impact the quality of meat and meat products.

Recommendation 3.5

Department of Agriculture management should develop and implement a policy respecting the timing of inspector follow-up of deficiencies identified during audits. The policy should include documentation requirements such as when follow-up is performed, the results, and when deficiencies are corrected.

3.20 *Enforcement* – If deficiencies are not corrected, inspectors have the authority to withhold inspection services until compliance is achieved. In more severe cases, the administrator of the program can suspend or revoke a facility’s licence and there is the option of prosecution. The meat inspection program does not have the authority to issue summary offence tickets for noncompliance. This authority could be beneficial in dealing with noncompliance for deficiencies which legislation requires to be corrected but which may not be serious enough to suspend operations.

Recommendation 3.6

Department of Agriculture management should take the steps required to obtain the authority to use other enforcement tools such as tickets when deficiencies are not corrected.

3.21 There is no policy outlining when inspectors should take enforcement action and which options to use based on severity or other factors. For example, if there is a minor deficiency which is not corrected, it may require enforcement even though it is minor. Management indicated that rather than using enforcement measures, the focus in the program is to work with facilities and educate them to achieve compliance since this is consistent with the practice encouraged by the Meat Inspection Act.

3.22 We are concerned that inspectors are not taking appropriate action to ensure deficiencies are corrected in a timely manner. During our audit we reviewed a sample of 133 deficiencies. The following is a summary of some key findings from our testing.

- Of the 133 deficiencies examined, 11 of these had been repeated in two or more consecutive audit reports.
- Three of the 11 deficiencies were assigned a rating of 2 which is a more serious deficiency. These deficiencies were included in two consecutive audit reports. The time between the two reports ranged from 3.5 months to 18 days.
- Eight of the 11 deficiencies were assigned a rating of 1.
 - Five of these deficiencies remained unresolved for 12 months or more. One of these five deficiencies remained unresolved over four audit reports for approximately 2.5 years. This is discussed further below.
 - One deficiency assigned a rating of 1 remained unresolved over three audit reports which covered 3.5 months.
 - Two deficiencies remained unresolved over two audit reports; one report covered approximately 2.5 months and the other report covered 1.5 months.

- 3.23 Although these deficiencies were identified in consecutive audits, no enforcement action was taken when the deficiencies went uncorrected.
- 3.24 Currently there is no way to determine whether deficiencies identified are being addressed in a timely manner. We believe that for many of the deficiencies noted in the audit reports we examined, the longer the deficiencies remain without being corrected the greater the potential risk to food safety.
- 3.25 Included in the 11 deficiencies discussed above was one case in which the same deficiency was identified on four consecutive facility audit reports over a period of approximately 2.5 years. Although the deficiency was not corrected inspectors did not take further action to achieve compliance. While the deficiency had a rating of 1 which is considered minor, it was reported as a violation of the Meat Inspection Act and there should be an expectation that issues will be fixed in a reasonable amount of time. We believe the length of time that this deficiency remained outstanding would warrant further action, including enforcement if necessary. Failure to use enforcement measures reduces the incentive for facilities to take prompt action to correct deficiencies that could potentially impact the safety of meat.
- 3.26 The audit process is not effective in ensuring compliance with the Meat Inspection Regulations. We found 21 of 133 deficiencies in which the same deficiency was identified on consecutive audit reports. Due to the length of time between the audits, we were unable to determine whether the deficiency was not corrected or if it was fixed but the same issue reoccurred before the next audit was conducted. The majority of these deficiencies related to the cleanliness and sanitary condition of the facility. The fact that a deficiency has reoccurred in a subsequent audit, even if it was corrected after the last audit, is a significant issue. Many facilities are not taking meat safety as seriously as they should.
- 3.27 There is no requirement to document enforcement actions taken. Management feel they would be aware of any enforcement actions. However, with no documentation there is no way to know with certainty what, if any, enforcement action was taken.

Recommendation 3.7

Department of Agriculture management should develop and implement a policy respecting the enforcement action to be taken when deficiencies are not addressed by the compliance date. The policy should include requirements for documentation of actions taken when deficiencies are not corrected.

- 3.28 *Frequency of audits* – The regulations do not outline the frequency of slaughterhouse and meat processing plant audits nor is there a documented policy. The facilities licensed under the program do not necessarily operate year round. Some facilities may operate several times a week while others may only operate a few times a year. Management and inspectors indicated there is an informal policy of completing monthly audits when a facility is operating.
- 3.29 We examined the frequency of audits conducted at the 28 slaughterhouses licensed under the meat inspection program during our audit period (April 2009 to December 2010). We found that none had an audit during every month in which they operated. Although we acknowledge that inspectors would have a regular presence in slaughterhouses while inspecting animals during slaughtering this does not negate the need for facility audits.
- 3.30 The following are some key findings from our testing of slaughterhouse audits.
- Four slaughterhouses had no audits from April 2009 to December 2010. One slaughterhouse operated for all 21 months, two operated for seven months, and one operated for five months.
 - 24 slaughterhouses were identified for which at least one audit was conducted but all required monthly audits during the time the slaughterhouses operated were not completed.
 - Eight of 24 slaughterhouses operated between six and 11 consecutive months without an audit.
 - Three of 24 slaughterhouses operated for 12 or more consecutive months without an audit.
- 3.31 The meat inspection program does not track when meat processing plants operate. However, management indicated that 10 of the 14 meat processing plants would have been operating on a monthly basis. We found none of these 10 plants had an audit conducted in every month they were operating as required. The following is a summary of some key findings from our testing.
- All ten plants had at least one audit of the 21 required monthly audits; five of these plants did not have between 11 and 15 required audits. The remaining five plants did not have 16 to 20 required audits.
 - Of the ten plants, where at least one audit was completed, five plants had six or more consecutive months without an audit and two of these plants operated for 13 or more consecutive months without an audit.
- 3.32 Although the informal policy is to complete audits during the months of operations, both management and the inspectors interviewed indicated the

frequency of audits should be determined based on assessed risk. Factors to consider when assessing risk should include the frequency of operations, whether ready-to-eat products are being processed, previous audit results, and history of addressing operational deficiencies.

- 3.33 If audits are not completed at the appropriate frequency, conditions which may result in the contamination of meat and meat products may not be properly identified.

Recommendation 3.8

Department of Agriculture management should complete a risk assessment to determine and document the required frequency of audits of slaughterhouses and meat processing plants. Management should take steps to ensure that audits are conducted as required.

- 3.34 *Water testing* – The Meat Inspection Regulations require each facility to have a supply of potable hot and cold water. A water supply that is free of contamination and at the correct temperature and pressure is very important to maintaining a sanitary facility. The Department does not have a policy concerning water testing such as frequency, required tests, and the process to be followed if contamination is discovered. Management have an undocumented policy of testing the water of provincially-licensed facilities at least once a year with the goal of testing twice a year. We examined a sample of 26 facilities during 2010 and found noncompliance with the undocumented policy and inconsistencies in water testing frequency. There were four facilities in which no water tests were conducted during 2010. For 18 facilities the water was tested once during the year, while water was tested twice during the same period for four facilities.

Recommendation 3.9

Department of Agriculture management should develop and implement a policy outlining the frequency of water tests, specific tests to be conducted, and the process to be followed if the water needs to be treated. Management should take steps to ensure the policy is being followed.

- 3.35 *Facility sanitation* – The regulations refer to requirements for facilities to be kept sanitary but do not further define what is required by inspectors to assess whether facilities are sanitary. Currently, the sanitary condition of a facility is based on a visual assessment and the judgment of an inspector. The program does not require inspectors to perform bacteria testing to detect possible contamination that is not visible. This is a greater risk at meat processing plants that produce ready-to-eat products. Testing for bacteria is required in Ontario's and Alberta's provincial meat inspection programs.

- 3.36 We understand management plan to require facility owners to test for bacteria. Inspectors would then examine the results of testing and conducting their own testing based on a risk analysis.

Recommendation 3.10

Department of Agriculture management should develop and implement a policy for bacteria testing including the frequency of testing required.

- 3.37 *Documentation of audit results* – There is inadequate documentation supporting the extent or completeness of audits conducted as well as whether appropriate actions are taken to ensure the timely correction of deficiencies reported. Improved documentation would reduce the risk of items being missed, help ensure consistency among inspectors, and provide evidence that the audits conducted were adequate. It would also provide a basis for management to review audit activities. The following paragraphs describe several areas in which documentation needs to be improved.
- 3.38 *Audit coverage* – The deficiencies identified during an audit are documented in an audit report. The report does not note which equipment or areas were examined within the facility so there is no way to confirm that inspectors have covered all policy and regulation requirements. The audit report does provide a list of possible deficiency areas to use when classifying deficiencies identified. This may be helpful as a reminder of areas to look at but should be expanded to include details of what to look for in those areas. For example, the list includes sanitation and equipment but does not provide details of what to look for regarding these items. The audit report should include an inspector’s signature verifying that they have examined all required areas and that deficiencies noted in the audit report have been discussed with the owner/staff.
- 3.39 *Documentation of compliance dates* – The audit report does not include a section for inspectors to document the date by which deficiencies must be corrected. It does include a note indicating “*Items identified above indicate violations of the Nova Scotia Meat Inspection Act and Regulations. The deficiencies identified must be corrected as indicated. Failure to correct the identified items in the specified time periods may result in legal actions.*” However, no time period is provided and action is not always being taken. Documentation of compliance dates, as well as the consequences of not meeting the deadline, are necessary to ensure facilities understand the severity of deficiencies and an appropriate timeline for correction. Establishing compliance dates will enable management and inspectors to better track the correction of deficiencies.
- 3.40 *Deficiency on subsequent audit report* – If a deficiency has reoccurred in a subsequent audit, this should be noted on the audit report even if it was

corrected from the last audit. In these instances, facilities are not taking meat safety as seriously as they should and this information will be useful when assessing the frequency of audits for these facilities.

Recommendation 3.11

Department of Agriculture management should take steps to ensure the following are documented in audit reports or supporting files:

- items examined in each area of the facility;
- inspector signoff indicating all required areas have been examined, deficiencies noted, and discussed with responsible facility owner/staff;
- a compliance date for each deficiency reported;
- consequences of not meeting compliance dates; and
- identification of reoccurring deficiencies.

3.41 *Qualifications of staff* – There are four minimum requirements related to meat safety for permanent meat inspectors. These include a diploma in animal science, food science or equivalent training; a food safety professional designation; recognized training in food processing and meat inspection procedures; and a certification in advanced food safety programs. We tested the qualifications of several permanent meat inspectors and found they have the minimum requirements for the position as established by the Department.

Program Management

Conclusions and summary of observations

Department management do not have adequate processes to ensure they are effectively and efficiently managing their responsibilities related to slaughterhouses and meat processing plants. Management do not have sufficient information to know whether audit processes are operating as designed and are effective in managing identified risks. For example, management do not know whether required facility audits are being conducted or whether significant deficiencies identified have been corrected in a timely manner. There is no quality assurance process in place to help verify that inspectors are ensuring compliance with legislation, inspection and audit activities comply with Department policies and procedures, and that policies and procedures are being applied consistently by inspectors. Management have adequate information to know that inspectors are present during the slaughtering of animals as required.

3.42 *Background* – The meat inspection program’s electronic management information system is AMANDA. Information about animals inspected

is entered into the system including the date of inspections, the facility, the inspector, number of animals slaughtered, portions condemned and the reason, inspector travel time to and from the plant, and the time the inspector was at the facility. AMANDA also includes the names of all facilities which are licensed as slaughterhouses or meat processing plants. Management use the information from AMANDA to produce monthly slaughter statistics which the Department is required to submit to the federal government. Management may create ad hoc reports as required such as meat that has been condemned.

- 3.43 *Inspector attendance during slaughtering* – The senior meat inspector creates weekly inspection schedules matching the availability of inspectors to the dates of slaughtering activities provided by the slaughterhouses. Inspectors provide information on the dates and slaughterhouses where they completed inspections. This information is compared to the inspection schedules supporting whether inspections were completed as scheduled.
- 3.44 *Audits of facilities* – The results of facility audits by inspectors are documented on a paper audit report and filed with the senior meat inspector. No information from the audit reports is entered into AMANDA. Although management have indicated that they review individual audit reports, we believe that this is insufficient to adequately monitor audit activities. Management’s informal policy is for audits of slaughterhouses and meat processing plants to be conducted each month if there are slaughtering or processing activities during the month. Management do not have readily available information to assess whether audits are being conducted as required. In our detailed testing of audit activities, we found that audits are not being completed as required. This was discussed earlier in this Chapter.
- 3.45 Management do not receive summary information on the results of audits conducted such as audit dates, deficiencies identified and when they are to be corrected, follow-up action, enforcement action, when or if deficiencies were corrected, and historical information on deficiencies within or among facilities. This information would help management to determine if policies and procedures are being followed, help ensure consistency among the inspectors, and help ensure risks are adequately addressed.
- 3.46 Management indicated it is their intention to require that inspectors begin entering information from audit reports into AMANDA. Staff have begun to enter information from older audit reports to test the system’s capabilities. When this Chapter was written, management had not identified any standard management reports that they would want from AMANDA.

Recommendation 3.12

Department of Agriculture management should determine their operational information needs including audit and inspection activities, and with the aid of AMANDA ensure the information is collected and available.

3.47 *Inspector time reports* – Meat inspectors are not required to submit weekly time reports detailing key activities completed each day and the hours involved. They are required to submit their travel time and time spent at a plant each day but the plant time could include time for inspections, audits or other tasks if there is some idle time between inspections. We also found that the inspectors were not always submitting the travel and plant time as required.

3.48 If complete data was submitted, it would provide valuable information for monitoring the activities and performance of inspectors as well as aid in the development of performance standards. There is no information available on activities other than inspections and audits. There is incomplete data available to analyze whether time spent on inspections or audits is reasonable.

Recommendation 3.13

The Department of Agriculture should ensure inspectors submit detailed time reports and the information provided from those reports should be used for resource and performance management.

3.49 *Monitoring staff performance* – Staff performance evaluations are not being completed on a regular basis; none were completed during our audit period. We reviewed a sample of seven inspectors and found that five had never had an appraisal; one has had three or four appraisals in the past 24 years; and one has had three appraisals in the past 14 years. Performance evaluations are necessary to ensure that staff are meeting desired performance expectations including recognition of good performance as well as identifying and addressing areas in which staff require development. The Department needs to develop a process for ongoing monitoring and evaluation of staff performance. This should include establishing performance expectations and targets, regular monitoring by management, and annual performance assessments.

Recommendation 3.14

The Department of Agriculture should implement a system to regularly monitor and assess staff performance.

3.50 *Quality assurance process* – Management do not have a quality assurance process in place. A quality assurance process is a set of planned and

systematic actions to provide confidence that a system is performing as required. This process should cover key aspects of the program including, on a sample basis, regular review of audit reports; observations of slaughtering inspections and audits completed; and assessment of deficiency severity and follow-up. Although management told us that audit reports are reviewed and facilities are periodically visited, we believe, as supported by the findings in this Chapter, that a more rigorous and comprehensive process is required. This process would provide management with additional assurance that all regulations are being monitored for compliance, policies and procedures are being consistently followed, and that inspectors are using appropriate professional judgment, especially with respect to deficiency ratings and follow-up.

Recommendation 3.15

The Department of Agriculture should implement a quality assurance process which includes key operational activities.

- 3.51 *Complaints* – The meat inspection program does not have a policy outlining how complaints received related to the operation of slaughterhouses and meat processing plants should be documented, investigated and resolved. The Department of Agriculture has a database, AMANDA, in which complaints can be entered, including the process to be followed to reach a resolution. A search of the database indicated no complaints were received related to provincially-licensed slaughterhouses or meat processing plants but during our testing of audit results, three complaints were found in facility files that had not been entered in AMANDA. There was little information in the files concerning how the complaints were investigated and resolved. Without an established complaint process, there is a risk that complaints which could lead to the production of unsafe meat or meat products may not be adequately investigated.

Recommendation 3.16

Department of Agriculture management should develop and implement a policy related to the documentation and investigation of meat safety complaints.

Response: Department of Agriculture

The Nova Scotia Department of Agriculture appreciates the opportunity to respond to the Auditor General's findings with regard to the Nova Scotia Meat Inspection program.

We are pleased that the Auditor General has identified that a core element of the meat inspection system, animal inspections, is being completed as required. In addition, we are pleased the qualifications of our permanent meat inspection staff are acknowledged by the Auditor General.

The Nova Scotia Department of Agriculture manages food safety risks in meat plants by using a multiple barrier approach. This approach recognizes that utilizing many strategies to manage risk in a facility is the optimum way to provide the best level of public health protection. Specifically in Nova Scotia, meat safety using our multiple barrier risk management is achieved through activities in five subject areas: facility design and approval; facility equipment; education; acute intervention and operational practices. We have significant involvement in all these subject areas. This involvement includes; regulatory and policy implementation, providing food safety expertise to plants, providing direct funding to plants to improve food safety, documenting interventions which eliminate threats to public health, determining trends from the documentation, providing continual education to our staff and to plant operators and ensuring the utilization of current technology.

The effectiveness of our program is measured by outcome. Meat coming from a provincially inspected meat plant has never been implicated in a food born illness in Nova Scotia. The Department is confident that our meat inspection program is effective in providing health protection to Nova Scotians but we are always looking to improve our program and enhance our processes.

The Department has reviewed the specific recommendations of the Auditor General. We believe that implementation of all these recommendations will strengthen our meat inspection program. The following is the Department's response to each recommendation.

Audit Response Recommendations

Recommendation 3.1

Department of Agriculture management should update the regulations to reflect the current operating procedures of the Nova Scotia meat inspection program.

Management has drafted updated regulations which reflect the current operating procedures of the program. These updated draft regulations will be reviewed in

light of the Auditor General's recommendations and considered for implementation by the Department prior to December 31, 2012.

Recommendation 3.2

Department of Agriculture management should develop and implement a policy to guide inspectors in assigning and documenting severity ratings for deficiencies.

Recommendation 3.3

Department of Agriculture management should require inspectors to provide a compliance date for addressing all deficiencies.

Recommendation 3.4

Department of Agriculture management should develop guidance for inspectors to use when assigning compliance dates to deficiencies.

Recommendation 3.5

Department of Agriculture management should develop and implement a policy respecting the timing of inspector follow-up of deficiencies identified during audits. The policy should include documentation requirements such as when follow-up is performed, the results, and when deficiencies are corrected.

Management will enhance and consolidate existing tacit and written policies into a policy manual which will address recommendations to deal with concerns of severity ratings for deficiencies, compliance dates and follow up inspections. This manual will be completed by September 2012.

Recommendation 3.6

Department of Agriculture management should take the steps required to obtain the authority to use other enforcement tools such as tickets when deficiencies are not corrected.

Management will examine the possible use of additional enforcement tools to address deficiencies not serious enough to suspend operations of a meat plant. This review will be completed by June 2012.

Recommendation 3.7

Department of Agriculture management should develop and implement a policy respecting the enforcement action to be taken when deficiencies are not addressed by the compliance date. The policy should include requirements for documentation of actions taken when deficiencies are not corrected.

Management will develop written policy to be included in a policy manual which will include requirements for the documentation of actions taken when deficiencies are not corrected. This manual will be completed by September 2012.

RESPONSE:
DEPARTMENT OF
AGRICULTURE

Recommendation 3.8

Department of Agriculture management should complete a risk assessment to determine and document the required frequency of audits of slaughterhouses and meat processing plants. Management should take steps to ensure that audits are conducted as required.

Management will undertake immediately a risk assessment process aimed at establishing a science and risk based inspection approach for slaughterhouses and meat processing plants. This approach currently exists in the restaurant inspection program and will be used as the basis to respond to this recommendation, effective December 31, 2011.

Recommendation 3.9

Department of Agriculture management should develop and implement a policy outlining the frequency of water tests, specific tests to be conducted and the process to be followed if the water needs to be treated. Management should take steps to ensure the policy is being followed.

Recommendation 3.10

Department of Agriculture management should develop and implement a policy for bacteria testing including the frequency of testing required.

Management will enter into discussions immediately with the Nova Scotia Department of Environment to determine the appropriate sampling frequency and testing parameters to ensure potable water at slaughterhouses and meat plants is available and documented.

Recommendation 3.11

Department of Agriculture management should take steps to ensure the following are documented in audit reports or supporting files:

- ***items examined in each area of the facility;***
- ***inspector signoff indicating all required areas have been examined, deficiencies noted, and discussed with responsible facility owner/staff;***
- ***a compliance date for each deficiency reported;***
- ***consequences of not meeting compliance dates; and***
- ***identification of reoccurring deficiencies.***

Management will begin immediate review of the existing audit format and update the audit report form to include items listed in the recommendation.

Recommendation 3.12

Department of Agriculture management should determine their operational information needs including audit and inspection activities, and with the aid of AMANDA ensure the information is collected and available.

Management will begin examining the capabilities of our AMANDA data base to provide operational information related to enhancing audit and inspection activities before December 31, 2011.

Recommendation 3.13

The Department of Agriculture should ensure inspectors submit detailed time reports and the information provided from those reports should be used for resource and performance management.

Management will establish a detailed time activity report for use by inspectors and management by December 31, 2011.

Recommendation 3.14

The Department of Agriculture should implement a system to regularly monitor and assess staff performance.

Management will regularly monitor and assess performance of staff through use of a performance appraisal process. This will be initiated January 2012.

Recommendation 3.15

The Department of Agriculture should implement a quality assurance process which includes key operational activities.

Management will develop a quality assurance process for the meat inspection program identifying key operational activities by June 2012.

Recommendation 3.16

Department of Agriculture management should develop and implement a policy related to the documentation and investigation of meat safety complaints.

Management will immediately implement a policy related to documenting and investigation of complaints concerning provincial meat plants.

RESPONSE:
DEPARTMENT OF
AGRICULTURE