



**DEPARTMENT OF AGRICULTURE, LAND REFORM  
& RURAL DEVELOPMENT**

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**DIRECTORATE: VETERINARY PUBLIC HEALTH**

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# **NHA-SOP01**

## **STANDARD OPERATING PROCEDURE FOR THE NATIONAL HYGIENE ASSESSMENT SYSTEM (HAS) AUDITS**



DEPARTMENT OF AGRICULTURE, LAND REFORM & RURAL  
DEVELOPMENT

DIRECTORATE VETERINARY PUBLIC HEALTH

**PROCEDURES MANUAL: NATIONAL HAS AUDITS**

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**A PURPOSE:**

The purpose of this manual is to standardize the procedures for assessing all high, low and rural throughput abattoirs in the country to determine the level of compliance based on the results of the Hygiene Assessment System (HAS).

**B SCOPE:**

**1. Field of inspection:**

1.1. High, Low and Rural throughput Abattoirs:

- i. *All Red Meat Abattoirs* (NHA-HAS01)
- ii. *All Poultry Abattoirs* (NHA-HAS02)
- iii. *All Ostrich Abattoirs* (NHA-HAS03)
- iv. *All Rural Red Meat Abattoirs* (NHA-HAS04)
- v. *All Rural Poultry Abattoirs* (NHA-HAS05)
- vi. *All Game Abattoirs (pending promulgation of Game regulations)*
- vii. *All Crocodile Abattoirs (pending promulgation of Crocodile regulations)*
- viii. *All Rabbit Abattoirs (pending promulgation of Rabbit regulations)*

**2. Type of Inspection:**

Statutory compliance promotion and enforcement of the requirements of the Meat Safety Act, 2000 (Act 40 of 2000) and all related Regulations promulgated under the Act.

**C QUALIFICATION, ADDITIONAL TRAINING AND EXPERIENCE OF OFFICIALS:**

1. For the purposes of the audits, HAS audits may only be conducted by the National Department of Agriculture and Provincial Veterinary Public Health (VPH) officials with a letter of competency to conduct HAS audits as issued by his/her PEO. (NHA-ANN01)
2. All Provincial VPH officials must be trained in conducting the Hygiene Assessment System (HAS) audits according to this Standard Operating Procedure (NHA-SOP01).
3. This training may only be conducted by officials with a valid letter of competence issued by the relevant PEO to do HAS audits.
4. The provincial authority must ensure the competency of all VPH officials conducting the HAS audits.

5. The Provincial Veterinary Authority (PVA) must issue a letter of competency; signed by the PEO, to each Provincial VPH official currently conducting HAS audits, stating that he/she is competent to perform HAS audits under this SOP.
6. The competency letter may only be issued after the PVA has assessed the competency of each VPH official according to the audit procedures described in this procedure. (NHA-ANN01)
7. The original letters of competency must be handed to the VPH official conducting HAS audits and copies must be kept by the PVA for auditing purposes.
8. All new VPH officials must be subjected to a total training/supervision period of at least 3 months at all categories of abattoirs. Depending on the level of experience of the official the PVA may either shorten or lengthen the training period to address identified training needs.
9. It is the responsibility of the supervisor of the new official to inform the PVA that the official has completed his/her training period.
10. The PVA must then assess the competence of the new official as described in this SOP before issuing a letter of competency to the official.
11. HAS may preferably be conducted by at least two officials too minimize bias.

#### **D FACILITIES AND INSTRUMENTS:**

1. The following instruments must be used with every HAS audit:
  - a) A digital calibrated thermometer which can accommodate a range of at least  $-30^{\circ}\text{C}$  to  $110^{\circ}\text{C}$ .
  - b) A light meter to measure light intensity of up to 1000 lux.  
(Measuring equipment of the facility or service provider may be used on the day of the audit)
2. Each official/audit team must have a calibrated thermometer on the day of the audit. Each official must have a copy of the Meat Safety Act (MSA) and applicable meat safety regulations which must be available during audits for reference purposes.
3. The reference or serial numbers of the instruments used during a particular HAS audit must be noted on that HAS form in the appropriate space.
4. All instruments referred to in D1 must be recorded in an equipment register.
5. When an instrument is suspected to be defective it should be withdrawn and sent for re-calibration and/or repair or replaced.
6. A master thermometer whereby other instruments are monitored or measured against must be available.
7. A master register must be kept. (NHA-ANN07)
8. Monitoring of instruments should be carried out regularly, as determined by the province.

9. Every official carrying out an abattoir audit must wear full and clean protective clothing as prescribed in the Meat Safety Act and the regulations.

## E METHODS AND PROCEDURES:

### HAS Audit by the Provincial Officials:

1. The HAS audit will be done according to internationally accepted auditing principles:
  - a) The abattoir owner may be notified in advance of the date of the intended audit
  - b) An opening meeting to discuss the objectives of the audit must be conducted at the beginning of the audit.
  - c) The audit must be conducted by using the appropriate checklist
  - d) The HAS checklist and corrective action report must be finalized at the end of the audit.
  - e) A closing meeting to discuss findings of the audit must be conducted at the end of the audit.
  - f) A follow-up inspection to verify corrective actions should be carried out.
2. During the opening meeting the abattoir owner or his/her representative and Hygiene Manager must be invited to join the audit. The hygiene Manager must always be present.
3. The HAS audit should then be conducted using the appropriate HAS checklist according to the category of the abattoir and the species slaughtered.
4. Scores should be allocated according to the conditions prevailing on the day of the audit but also taking into consideration the previous unannounced inspections, including the verified HAS reports done by the abattoir/assignee, and the abattoir's Hygiene Management System records.
5. The HAS is a regulatory compliance audit and not a food safety audit directly:
  - a) Scores should be allocated according to the level of compliance to the regulations applicable to the item being assessed, i.e. if the abattoir is compliant with **every single requirement**; an "EXCELLENT" score should be allocated.
  - b) If **none of the requirements** for that item are met, a "BAD" score should be allocated.
  - c) Allocating "GOOD", "FAIR" or "POOR" scores will depend on the level of compliance to the requirements, keeping in mind that if only 50% of requirements are met, a "FAIR" should be allocated.
  - d) The severity of the non-conformances should not be taken into account when allocating a score; this will be addressed when prioritizing the non-conformances and applying recommended actions below.
6. During the HAS audit the HAS checklist must be completed and all non-conformances should be prioritized as minor, major or critical.
7. The reason/s for not giving full scores should be explained in the comments section of the HAS checklist.
8. The prioritization of the non-conformances must then be indicated in the designated column on the HAS form as follows:
  - a) **mm** = Minor non-conformance
  - b) **M** = Major non-conformance

c) **C** = Critical non-conformance

9. Other non-conformances that do not necessarily impact on the safety of the end product at the abattoir should be prioritized by using the same guidelines as mentioned in E.5. for instance by replacing the wording "*risk to the safety of the product*" with the appropriate activity then it will be a risk to, for example "*humane handling*" in case of the handling of live animals or "*risk to the public and/or environment*" in the case of handling and disposing of waste at the abattoir.
10. All non-conformances prioritized as "*critical*" or "*major*" must be listed as non-conformances on the prescribed corrective action report. Proposed completion dates of corrective actions must be discussed with the owner and Hygiene Manager, but the Provincial Official has the final say in the matter taking into consideration the nature of the non-conformance.
11. The preliminary audit report must be discussed with the owner or his/her representative during the closing meeting
12. The owner or his/her representative must then sign for acknowledgement and commitment on the allocated space on the corrective action report. If the list of non-conformances runs over more than one page, each page should be numbered and signed by the owner.
13. If no major/critical nonconformance are to be listed, the wording "NO MAJOR/CRITICAL NON-CONFORMANCES" must be noted on the corrective action page of the HAS checklist. The owner or his/her representative must also sign this checklist before copies are made.
14. The provincial officials that have conducted the HAS audit must sign on the allocated space on the third page of the checklist before copies are made.
15. After the necessary copies have been made, the completed HAS checklist must then be returned to the owner or Hygiene Manager as soon as possible following the completion of the audit to enable them to carry out the corrective actions.
16. Non-conformances prioritized as critical must be addressed immediately or production must be stopped by issuing an Instruction (NHA-ANN03) until it could be corrected.
17. The completed corrective action reports at the back of the HAS checklist must be signed off by the Provincial VPH official when the non-conformance has been rectified to his/her satisfaction.
18. Corrective actions indicated during previous HAS audits that have not been closed out should be carried over into the current corrective action reports but clearly indicating a reference to the previous audit report. Corrective Action reports should be verified and signed off where applicable during routine inspections between HAS audit and also during follow-up inspections when required.
19. Failure to correct listed non-conformances on the corrective action report may lead to an escalation of the non-conformance and possible serving of an Instruction in terms of Section 10 of the Meat Safety Act.
20. Escalation steps when non-compliances are noted:

STEP	ACTION	ESCALATION
1	Non-conformance noticed	Corrective action report
2	Failure to implement corrective action by completion date	Escalation of priority and / or issue of an Instruction
3	Failure to comply with Instruction	Initiate steps for possible prosecution and/or, initiate steps to withdraw Registration Certificate (Section 9 of the Meat Safety Act)

21. All HAS scores (final and category) must be recorded in the Summary of HAS scores and forwarded to the National Executive Officer on an annual basis.(NHA-ANN04)

#### **F INTERVALS OF HAS AUDITS:**

1. HAS audits should be conducted by VPH officials preferably at quarterly intervals at all abattoirs.
2. A minimum of three audits per abattoir per year must be conducted.

#### **G DOCUMENTATION:**

1. The HAS checklists must be periodically updated by the National HAS Committee. These updates must be communicated to all Provinces for distribution to all inspectors at abattoirs by each Provincial Executive Officer.
2. Only the current version approved by the National Executive Officer must be used during HAS audits.

#### 3. List of documents:

- |      |  |             |
|------|--|-------------|
| 3.1  | Procedures Manual                                    | (NHA-SOP01) |
| 3.2  | Hygiene Assessment System: Red Meat Abattoirs        | (NHA-HAS01) |
| 3.3  | Hygiene Assessment System: Poultry Abattoirs         | (NHA-HAS02) |
| 3.4  | Hygiene Assessment System: Ostrich Abattoirs         | (NHA-HAS03) |
| 3.5  | Hygiene Assessment System: Rural Red Meat Abattoirs  | (NHA-HAS04) |
| 3.6  | Hygiene Assessment System: Rural Poultry Abattoirs   | (NHA-HAS05) |
| 3.7  | Provincial Authority Competency letter               | (NHA-ANN01) |
| 3.8  | Provincial Authority audit checklist                 | (NHA-ANN02) |
| 3.9  | Instruction in Terms of Article 10 of the MSA        | (NHA-ANN03) |
| 3.10 | Summary of HAS scores                                | (NHA-ANN04) |
| 3.11 | National HAS Audit Committee Audit Checklist         | (NHA-ANN05) |
| 3.12 | Impartiality and Confidentiality Agreement           | (NHA-ANN06) |
| 3.13 | Internal verification report for thermometers        | (NHA-ANN07) |
| 3.14 | Master Register                                      | (NHA-ANN08) |
| 3.15 | Meat Safety Act, 2000 (Act 40 of 2000)               |             |
| 3.16 | All applicable Regulations under the Meat Safety Act |             |

These documents form part of this procedure.

#### **H DOCUMENT ROUTES:**

1. Original HAS audit reports must be filed by the province for reference and audit purposes.
2. Copy of the HAS audit report must be sent to the abattoir owner.
3. All other correspondence concerning HAS audits must also be kept on the HAS file of that particular abattoir.

#### **I DATA TRANSFERS:**

When data is transferred from one audit checklist to another, the following verification procedures must be taken to ensure data integrity:

1. When an auditor, upon completion of a HAS audit, transfers the data from the roughly completed form to a new form, he/she must carefully check the transferred data, page by page.
2. The inspector must initial each page of the new form that has been verified, on the right hand bottom corner of each page.
3. All rough forms must also be filed for audit purposes.
4. If the data transfer has been done by a third party, e.g. administration clerk, the inspector that has done the inspection, must then also verify the data transfer by following the above procedure.

#### **J APPOINTMENT OF PROVINCIAL HAS AUDIT COMMITTEE**

The Provincial Executive Officer must appoint experienced VPH Officials to the Provincial HAS Committee and nominate a convener of the committee in writing. The names of the committee members must be formally communicated to the Veterinary Public Health Officials in the province.

#### **K THE RESPONSIBILITIES OF THE PROVINCIAL HAS AUDIT COMMITTEE WILL BE AS FOLLOWS:**

- a) Training and competency verification of Provincial Veterinary Officials on HAS audits.
- b) Perform internal audits on Provincial Veterinary Officials.
- c) Handle appeals concerning audit results.
- d) Carry out competency assessment audits on all current veterinary officials at least once in every two years as well as new officials after completion of the recommended training.
- e) Arranging training on new officials on how to apply HAS.
- f) Prepare audit schedule.
- g) For an audit to be conducted by the provincial HAS committee a minimum of 3 members must be present during the audit.
- h) Prepare annual reports for the PEO.

#### **L NATIONAL HAS AUDIT COMMITTEE (NHAC):**

1. The National Executive Officer must appoint, in writing, an experienced VPH official from Department of Agriculture as the convener of the committee.
2. The National HAS Audit Committee must consist of the convener and at least 5 members nominated from different provinces.
3. A secretary may be appointed to the committee by the convener if deemed necessary.
3. The related abattoir industries may nominate a representative to the National HAS Auditing Committee.
4. The National HAS Auditing Committee must be appointed in writing by National Executive Officer.
5. The responsibilities of the National HAS Auditing Committee will be as follows:
  - a) Setting standard of-Provincial HAS Audit.
  - b) Perform audits on Provincial Veterinary Authorities on the implementation of SOP for National HAS Audits. (NHA-ANN05). Frequency of audits will be determined by the NEO.
  - c) Co-opt replacement members for appointed members in their absence.
  - d) To standardize and update all documents related to the implementation of the Hygiene Assessment Systems (HAS) in provinces, when required.
  - e) Updating HAS documents.

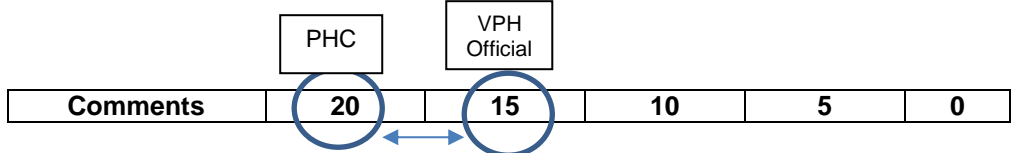
## **M INTERNAL AUDITS BY THE PROVINCIAL AUTHORITIES:**

Two types of internal audits will be performed within the VPH units of each Province:

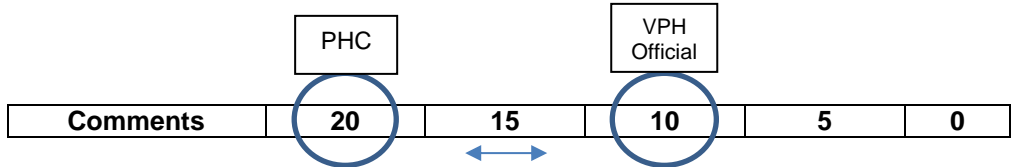
1. Supervisory audits:
  - 1.1 The supervisors of auditing officials must verify compliance with the requirements of this SOP as well as to assess the technical quality of the HAS audits done by the officials at least twice a year.
  - 1.2 HAS audits verified by the supervisor should be signed by him/her on the first page of the HAS checklist.
  - 1.3 All major or critical non-conformances must be recorded and dealt with according to the requirements of this SOP
2. Provincial Veterinary Authority (PVA)
  - a) Audits will be done on all Provincial VPH Officials doing HAS audits.
  - b) All Provincial VPH Officials should be audited at least once in 3 years.
  - c) The purpose of the internal audits will be to ensure that HAS audits in each province are carried out objectively and uniformly according to this procedure.
  - d) The format of the Provincial Veterinary Authority audit will be as follows:



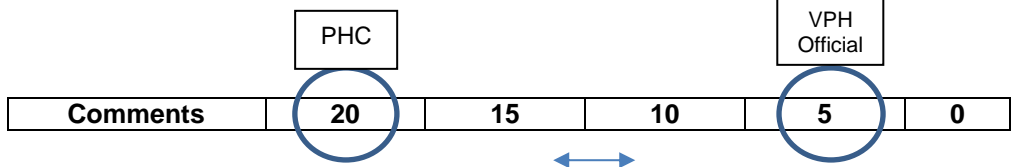
- i. The PVA members as well as the VPH Provincial Official to be audited will perform a HAS audit at an abattoir selected by the Provincial HAS Committee. The scope of the audit is as follows:
  - *Comparative HAS audit at an abattoir*
  - *Audit of records (previous HAS reports) to verify compliance to this procedure e.g. closing out of corrective actions, frequency of audits, current versions of checklists being used and the overall correct usage of documents.*
- ii. The comparative audits (Provincial HAS Audit Committee) will be performed at the same time but independent from each other.
- iii. The results of the two audits will be compared. Previous HAS audits done at that abattoir should also be compared.
- iv. The Provincial HAS Committee must complete the provincial authority (PVA) audit checklist and comment on the outcome of the audit. (NHA-ANN02)
- v. Differences between the HAS scores of the Provincial HAS Committee and the VPH official must be noted on the audit form as follows:
  - *Minor: 1 position (item score) lower or higher than Provincial HAS Committee (max 25% allowed)(PHC – Provincial HAS Committee)*



- *Major: 2 positions (item scores) lower or higher than Provincial HAS Committee (max 3% allowed) (PHC – Provincial HAS Committee)*



- *Critical: 3 positions (item scores) and more lower or higher than Provincial HAS Committee (0% allowed) (PHC – Provincial HAS Committee)*



- vi. The Provincial VPH Official being audited must be allowed to defend his/her marks allocated and if the committee is convinced to accept such mark(s) based on the official's knowledge of the abattoir as provided for by previous HAS audits, the Provincial HAS Committee may accept his/her mark if the decision is unanimous.
- vii. If differences exceed the limits allowed, the reason for this should be determined and applicable corrective actions applied.

**O IMPARTIALITY AND CONFIDENTIALITY:**

1. Each official doing abattoir audits under this procedure must sign the Agreement of Impartiality and Confidentiality (NHA-ANN06)
2. The signed agreements must be kept on file by the Provincial Veterinary Authority for audit purposes.
3. Section 17 of the Meat Safety Act, 2000 (Act 40 of 2000) must also be applied.

## **P COMPLAINTS AND APPEALS:**

1. The owner of an abattoir has the right to lodge an appeal in writing against:
  - a) A particular official(s) doing audit(s) at his/her abattoir.
  - b) The HAS score allocated to his abattoir.
  - c) Any other decision made by officials regarding the abattoir.
2. Any appeal relating to decisions made by officials must be done in writing within 30 days after being informed of the decision to the PEO stating in full the reason(s) for the appeal. (The PEO may assign a committee or individual to address the appeals on his behalf)
3. The PEO may refer the appeal to the Provincial HAS Committee/delegated official to investigate and report back on the outcome of the investigation.
4. Where applicable the HAS score obtained by the Provincial HAS Committee/delegated official will be regarded as the final score.
5. The outcome of the investigation and the resolution of the appeal must be communicated to the complainant within 30 days of receiving the appeal.
6. All complaints or appeals investigated as well as the results must be recorded and kept for audit purposes.
7. Section 18 of the Meat Safety Act, 2000 (Act 40 of 2000) and the applicable Regulations must be applied.

## **N FRAUD PREVENTION AND DETECTION:**

1. The following procedures described in this SOP are aimed at preventing and detecting fraud by officials doing HAS inspections:
  - Signing of the Impartiality and Confidentiality Declaration
  - Supervisory audits by each official's supervisor
  - Audits by the Provincial HAS Committee and NHA Committees
  - Complaints and Appeals procedure

**End**