United States Department of Agriculture
Food Safety and Inspection Service
Washington, D.C. 20250

Dr. Marc Cornelis
Chief Veterinary Officer
Federal Agency for the Safety of the Food Chain
WTC III – (8th Floor)
Simon Bolivarlaan 30
Brussels, B-1000
Belgium

Dear Dr. Cornelis:

The Food Safety and Inspection Service (FSIS) conducted an on-site audit of Belgium's meat inspection system March 13 to March 20, 2008. Comments from Belgium have been included as an attachment to the final report. Enclosed is a copy of the final audit report.

If you have any questions regarding the FSIS audit or need additional information, please contact me at telephone number (202) 690-5646, by facsimile at (202) 720-0676, or electronic mail at donald.smart@fsis.usda.gov.

Sincerely,

Gary D. Bobstad (for Donald Smart)

Donald Smart
Director
International Audit Staff
Office of International Affairs

Enclosure

cc list:

Geert Criel, Minister-Counselor, Embassy of Belgium, Washington
Canice Nolan, First Secretary, EU Mission to the US, Washington, DC
Steve Huete, Attaché, FAS, US Embassy, The Hague
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Belgium Country File

FSIS:OIA:IAS:DSMART:202-690-5646:Belgium
FINAL AUDIT LETTER November 6, 2008

FINAL REPORT OF AN AUDIT CARRIED OUT IN BELGIUM COVERING BELGIUM'S MEAT INSPECTION SYSTEM

MARCH 13 THROUGH MARCH 20, 2008

Food Safety and Inspection Service
United States Department of Agriculture

TABLE OF CONTENTS

ABBREVIATIONS AND SPECIAL TERMS USED IN THE REPORT

CCA	Central Competent Authority (Federal Agency for the Safety of the Food Chain)
DG	Directorate General
E. coli	*Escherichia coli*
FASFC	Federal Agency for the Safety of the Food Chain
FSIS	Food Safety and Inspection Service
PCU	Provincial Control Unit
PR/HACCP	Pathogen Reduction/Hazard Analysis and Critical Control Point Systems
Salmonella	*Salmonella* species
SSOP	Sanitation Standard Operating Procedures
U.S.	United States
VEA	European Commission/United States Veterinary Equivalence Agreement
VIC	Veterinarian-In-Charge

1. INTRODUCTION

The audit took place in Belgium from March 13 through March 20, 2008.

An opening meeting was held on March 13, 2008, in Brussels with the Central Competent Authority (CCA). At this meeting, the FSIS auditor confirmed the objective and scope of the audit, the FSIS auditor's itinerary and requested additional information needed to complete the audit of Belgium's meat inspection system.

The auditor was accompanied during the entire audit by a representative from the CCA, the Federal Agency for the Safety of the Food Chain (FASFC).

2. OBJECTIVE OF THE AUDIT

This was a routine annual audit. The objective was to evaluate the performance of the CCA with respect to controls over the processing establishment certified by the CCA as eligible to export meat products to the United States.

In pursuit of the objective, the following sites were visited: the headquarters of the CCA, the Provincial Control Unit, one microbiology laboratory, and one meat processing establishment.

Competent Authority Visits			Comments
Competent Authority	Central	1	Brussels
	Provincial	1	Limburg
Meat Processing Establishment		1	Hasselt
Microbiology Laboratory		1	Herstal

3. PROTOCOL

This on-site audit was conducted in three parts. One part involved visits with CCA officials to discuss oversight programs and practices, including enforcement activities. The second part involved an audit of a selection of records in Belgium's inspection headquarters office and Provincial Control Unit office. The third part involved an on-site visit to one external (private) laboratory and one meat processing establishment.

Program effectiveness determinations of Belgium's meat inspection system focused on five areas of risk: (1) sanitation controls, including the implementation and operation of Sanitation Standard Operating Procedures (SSOP) and Sanitation Performance Standards (SPS), (2) animal disease controls, (3) slaughter/processing controls, including the implementation and operation of Hazard Analysis/Critical Control Point (HACCP) systems, (4) residue controls, and (5) enforcement controls. Belgium's inspection system was assessed by evaluating these five risk areas.

During the on-site establishment visit, the FSIS auditor evaluated the nature, extent and degree to which findings impacted on food safety and public health. The FSIS auditor

also assessed how inspection services are carried out by Belgium and determined if establishment and inspection system controls were in place to ensure the production of meat products that are safe, unadulterated and properly labeled.
At the opening meeting, the FSIS auditor explained to the CCA that its inspection system would be audited in accordance with three areas of focus. First, under provisions of the European Community/United States Veterinary Equivalence Agreement (VEA), the FSIS auditor would audit the meat inspection system against European Commission Directive 64/433/EEC of June 1964. This directive has been declared equivalent under the VEA.

Second, in areas not covered by this directive, the FSIS auditor would audit against Food Safety Inspection Service (FSIS) requirements. FSIS requirements include daily inspection in all certified establishments, the handling and disposal of inedible and condemned materials, species verification, and FSIS requirements for HACCP and SSOP programs.

Third, the FSIS auditor routinely audit against any equivalence determinations that have been made by FSIS. The following equivalence determinations have been made for Belgium:

- The use of ISO 11290-1 microbiology testing method for *Listeria monocytogenes* in ready-to-eat products.

- The use of ISO 6579:2002 microbiology testing method for *Salmonella* in ready-to-eat products and swine carcasses.

4. LEGAL BASIS FOR THE AUDIT

The audit was undertaken under the specific provisions of U.S. laws and regulations, in particular:

- The Federal Meat Inspection Act (21 U.S.C. 601 et seq.).

- The Federal Meat Inspection Regulations (9 CFR Parts 301 to end), which include the Pathogen Reduction/HACCP regulations.

In addition, compliance with the following Community Directive was also assessed:

- Council Directive 64/433/EEC of June 1964 entitled Health Problems Affecting Intra-Community Trade in Fresh Meat.

5. SUMMARY OF PREVIOUS AUDITS

Final audit reports are available on FSIS' website at the following address:
http://www.fsis.usda.gov/Regulations_&_Policies/Foreign_Audit_Reports/index.asp

The two most recent FSIS audits of Belgium's meat inspection system were conducted in December 2005 and in February/March 2007.

December 2005 Audit

During the FSIS audit of Belgium's meat inspection system conducted in December 2005, the following deficiencies were identified:

- In the one certified establishment audited, monitoring and verification records of the establishment did not include the time each entry was made.

February-March 2007 Audit

During the audit of Belgium's meat inspection system conducted February 27 through March 5, 2007, no deficiencies were identified.

6. MAIN FINDINGS

6.1 Legislation

The FSIS auditor was informed that the relevant EC Directive, determined equivalent under the VEA, had been transposed into Belgium's legislation.

6.2 Government Oversight

The FASFC has four Directors General (DG): one for Laboratories, one for Corporate Services, one for Control Policy, and one for Control. The DG for Laboratories is divided into internal (Government) and external (private) laboratories. Certain external laboratories are also public laboratories (e.g. universities). The DG for Corporate Services is responsible for human resource management, finance, and legal services. The DG for Control Policy (roughly equivalent to FSIS Office of Policy, Program, and Employee Development) establishes process standards. The DG for Control (roughly equivalent to FSIS Office of Field Operations) carries the responsibility for inspection/audit services and enforcement of process and product standards. This DG for Control is divided into eleven Provincial Control Units (PCU), one for each of the10 Provinces and one for the capital city of Brussels. The DG for Control also has two Coordinators, one for the Flemish-speaking (northern) half of the country and one for the French-speaking (southern) half. These Coordinators supervise the Heads of the PCU and ensure uniform distribution and implementation of the DG for Control Policy among the 11 PCU.

There are three Sectors under each PCU, each of which has a Sector Head. The three Sectors are:

1. Primary Production, responsible for live animals up to and including slaughter (areas of responsibility include animal welfare, animal disease, and controls of antibiotics and other veterinary pharmaceuticals) before sale in the markets.

2. Fabrication and Transformation (Processing), responsible for food (including meat processing), production of animal feed, and production of fertilizers and pesticides.
3. Distribution, responsible for markets and restaurants.

6.2.1 CCA Control Systems

When the management of an existing establishment wishes to become eligible to export to the U.S., the manager makes an application to the PCU. A Provincial Official Inspector conducts an administrative and technical inquiry and submits a report of the results to the Chief of the PCU, who, in turn, makes a recommendation to the DG Control Headquarters on the basis of the report. The final approval for U.S.-export certification is the responsibility of DG Control. To qualify for eligibility to export to the U.S., an establishment must first meet EC requirements and must be eligible to produce for inter-community trade. If there is any question regarding the full eligibility of the establishment, a headquarters official from DG Control - Transformation may visit the premises on-site before a final approval is granted.

Communications regarding FSIS requirements are transmitted directly by the agricultural section of the U.S. Embassy in The Hague, Netherlands, to the Head of FASFC International Affairs (the Counselor General, DG Control Policy). This information is then transmitted, as well as other official guidelines and instructions that are issued by DG Control Policy, to the DG for Control. DG Control forwards them by e-mail and through the mail service to the Head of the PCU. The latter, in turn, provides them immediately to the Veterinarian-In-Charge (VIC).

To maintain U.S. certification, an establishment must be in compliance with a detailed audit of FSIS requirements. Officials from the PCU conduct the annual certification audit, periodic supervisory reviews, and ensure FSIS requirements continue to be met. If any of the requirements are not met, the PCU correlates with DG Control to determine if U.S. eligibility should be revoked.

6.2.2 Ultimate Control and Supervision

The VIC, of the establishment audited, is a full-time FASFC (Civil Service) employee, and provides inspection coverage of other establishments. There are also two contract FASFC (Assigned) veterinarians. They alternate inspection coverage with the VIC. They have had inspection training similar to that of the VIC, including official courses in HACCP and SSOP.

The National Implementation and Coordination Unit (NICU) provides oversight to ensure uniform distribution and implementation of DG Control Policy among the 11 PCUs by means of a comprehensive audit and inspection review program with established checklist, system controls, including reporting documents, system for analyzing data collected, and distribution of reports at all levels.

6.2.3 Assignment of Competent, Qualified Inspectors

Applicants wishing employment in the FASFC must pass a civil service examination. Specific additional examinations are prepared and required for veterinarians. The responsibility for the hiring of veterinarians and other inspection employees lies with the Minister of Public Health. The hiring process is conducted by Selor, a separate agency. The hiring of assigned/contract veterinarians is organized by the PCUs. Universities which offer a veterinary medicine curriculum, must offer public health courses and test accordingly. Both federally recruited and assigned/contract veterinarians must perform on-the-job training with an experienced official inspector. DG Corporate services maintain the Center for training and Development and offers targeted courses for official veterinary inspectors.

Both full-time and assigned/contract government employees are prohibited by law from performing any private, establishment-paid tasks at an establishment in which they perform official inspection duties. For full-time government employees, this is regulated in the law of February 4, 2000, "Creation of the Federal Agency for the Safety of the Food Chain." A private-practice veterinarian may be hired as a part time or contract government employee, but may not perform any private, establishment-paid tasks in any establishment in which he/she has official duties, nor may he have any additional conflicts of interest. This is regulated by the Royal Decree of December 19, 2002.

6.2.4 Authority and Responsibility to Enforce the Laws

Belgium law dated February 4, 2000; "Creation of the Federal Agency for the Safety of the Food Chain." grants the FASFC legal authority and responsibility to enforce Belgium meat inspection law. The Belgium Royal Decree dated May 16, 2001 describes the organizational structure of the FASFC. Third country specific export requirements, including U.S. requirements, are documented in the "Manual of Country Specific Export Requirements." The FASFC Instruction IB US 03 of September 2007 provided updated requirements for export of meat products to the U.S.

The VIC, as well as all other authorities in the chain of command up to DG Control, has full regulatory authority from retention of product up to and including suspension of operations.

6.2.5. Adequate Administrative and Technical Support

The Royal Decree dated April 15, 2005 constitutes the legal base to approve the external private laboratories but also the public laboratories. The five internal laboratories of the FASFC are also approved by this Royal Decree.

The Belgium Organization for Accreditation (BELAC) is the official accreditation body for accreditation of laboratories and is placed under the responsibility of the Federal Public Service for Economic Affairs.

Ongoing accreditation audits are conducted about every 18 months by a joint audit team comprised of representatives from BELAC and DG for Laboratories.

The government verification testing samples collected in the eligible establishment are submitted to an external private laboratory for analysis. The CCA had not requested an equivalence determination from FSIS concerning the use of private laboratories for analysis of official samples.

6.3 Headquarters Audit

The FSIS auditor conducted a review of inspection system documents. This records review was conducted at the headquarters office of FASFC in Brussels, at the Provincial Control Unit for Limburg office in Hasselt, and at the FASFC inspection office located in the establishment audited. The records review focused primarily on food safety hazards and included the following:

- Internal review reports.
- Supervisory visits to the establishment that was certified to export to the U.S.
- Training records for inspectors.
- Label approval records.
- New laws and implementation documents such as regulations, notices, directives and guidelines.
- Laboratory accreditation and audit procedure.
- Sampling and laboratory analyses for microbiology.
- Sanitation, slaughter and processing inspection procedures and standards.
- Control of products from livestock with conditions such as tuberculosis, cysticercosis, etc., and of inedible and condemned materials.
- Export product inspection and control including export certificates.
- Enforcement records, including examples of intended legal action and criminal prosecution.

No concerns arose as a result of the examination of these documents.

7. ESTABLISHMENT AUDITS

The FSIS auditor audited the only meat processing establishment that was eligible to export meat products to the U.S. The establishment was not delisted and did not receive a Notice of Intent to Delist.

8. LABORATORY AUDITS

During laboratory audits, emphasis is placed on the application of procedures and standards that are equivalent to the U.S. requirements.
Residue laboratory audits focus on sample handling, sampling frequency, timely analysis data reporting, analytical methodologies, tissue matrices, equipment operation and printouts, detection levels, recovery frequency, percent recoveries, intra-laboratory check samples, and quality assurance programs, including standards books and corrective actions. No residue laboratories were audited.

Microbiology laboratory audits focus on analyst qualifications, sample receipt, timely analysis, analytical methodologies, analytical controls, recording and reporting of results, and check samples. If private laboratories are used to test U.S. samples, the FSIS auditor evaluates compliance with the criteria established for the use of private laboratories under the FSIS Pathogen Reduction/HACCP requirements.

The following microbiology laboratory was reviewed:

Quality Partners S.A., an external (private) laboratory in Herstal, was performing microbiological analyses on product eligible for export to the U.S. This laboratory was performing analyses of ready-to-eat products for Listeria monocytogenes and Salmonella as required. This laboratory was also performing species identification testing through a subcontracted laboratory ECCA laboratory in Ghent.

The laboratory ECCA in Ghent is a BELAC accredited and FASFC approved laboratory however the ELISA method being used to identify species proteins had not received technical accreditation from the accrediting authorities.

9. SANITATION CONTROLS

As stated earlier, the FSIS auditor focuses on five areas of risk to assess Belgium's meat inspection system. The first of these risk areas that the FSIS auditor reviewed was Sanitation Controls.

Based on the on-site audit of the establishment, Belgium's inspection system had controls in place for SSOP programs, all aspects of facility and equipment sanitation, the prevention of actual or potential instances of product cross-contamination, good personal hygiene and practices, and good product handling and storage practices.

In addition, Belgium's inspection system had controls in place for water records, chlorination procedures, back-siphonage prevention, separation of operations, temperature control, work space, ventilation, welfare facilities, and outside premises.

9.1 SSOP

The establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOP were met, according to the criteria employed in the U.S. domestic inspection program. The SSOP program in the establishment was found to meet the basic FSIS regulatory requirements. No deficiencies were observed.

9.2 EC Directive 64/433

In the establishment, not all of the provisions of EC Directive 64/433 were effectively implemented. As of January 1, 2006, Directive 64/433/EC on hygiene in meat processing plants has been repealed and replaced by:
-Regulation (EC) No. 852/2004 of the European Parliament and of the Council of 29 April 2004 on the hygiene of foodstuffs;

-Regulation (EC) No. 853/2004 of the European Parliament and of the Council of 29 April 2004 laying down specific hygiene rules for food of animal origin.
These rules are currently in negotiation by the U.S. and EU committee for veterinary equivalence but have not been adopted into the VEA.

The specific deficiencies are noted in the attached individual establishment report.

10. ANIMAL DISEASE CONTROLS

The second of the five risk areas that the FSIS auditor reviewed was Animal Disease Controls. These controls include ensuring adequate animal identification, control over condemned and restricted product, and procedures for sanitary handling of returned and reconditioned product.

No Belgian slaughter facilities were certified as eligible to export to the U.S. at this time. No deficiencies were observed during the review of records at the central office in Brussels or during the on-site audit of one processing establishment.

11. SLAUGHTER/PROCESSING CONTROLS

The third of the five risk areas that the FSIS auditor reviews is Slaughter/Processing Controls. The controls include the following areas: ante-mortem inspection procedures, ante-mortem disposition, humane handling and humane slaughter, post-mortem inspection procedures, post-mortem disposition, ingredients identification, control of restricted ingredients, formulations, processing schedules, equipment and records, and processing controls of cured, dried, and cooked products.

The controls also include the implementation of HACCP systems in all establishments and implementation of a generic *Escherichia coli (E. coli)* testing program in slaughter establishments.

11.1 Humane Handling and Slaughter

No Belgian slaughter facilities are certified as eligible to export to the U.S at this time.

11.2 HACCP Implementation

All establishments approved to export meat products to the U.S. are required to have developed and adequately implemented HACCP programs. These programs are evaluated according to the criteria employed in the U.S. domestic inspection program.

The HACCP program was reviewed during the on-site audit of the establishment. The establishment management had adequately implemented the HACCP requirements. No deficiencies were observed.

11.3 Testing for Generic *Escherichia coli*

No Belgian slaughter facilities were certified as eligible to export to the U.S. at this time. Therefore, the establishment was not required to meet the FSIS regulatory requirements for generic *E. coli* testing.

11.4 Testing for *Listeria monocytogenes*

The processing establishment audited had previously produced ready-to-eat products (pork shoulders and picnic hams) for export to the U.S. and currently this same establishment is not exporting any products to the U.S. This product was fully cooked in hermetically-sealed plastic pouches with no post-lethality exposure to the environment; therefore the establishment was not required to have a *Listeria* testing program as FSIS requires in 9 CFR 430.4. Even though the establishment is not currently producing ready-to-eat products, the CCA is required to conduct finished product testing on the same or similar product. Finished product testing is limited to "non-risk based testing" for *Listeria monocytogenes* as mandated by FSIS Directive 10,210.1 Amendment 6, which requires product testing of three times per year. (Ready-to-eat products are required to be tested for both *Listeria monocytogenes* and *Salmonella.*) No deficiencies were observed.

11.5 EC Directive 64/433

In the establishment audited, the provisions of EC Directive 64/433 were effectively implemented. No deficiencies were observed.

12. RESIDUE CONTROLS

The fourth of the five risk areas that the FSIS auditor reviewed was Residue Controls. These controls include sample handling and frequency, timely analysis, data reporting, tissue matrices for analysis, equipment operation and printouts, minimum detection levels, recovery frequency, percent recoveries, and corrective actions.

No Belgian slaughter facilities were certified as eligible to export to the U.S. at this time. All meat products eligible for export to the U.S. are imported from eligible establishments in the Netherlands.

12.1 EC Directive 96/22

No Belgian slaughter facilities were certified as eligible to export to the U.S. at this time. Residue testing of incoming product is performed in the country of origin.

12.2 EC Directive 96/23

No Belgian slaughter facilities were certified as eligible to export to the U.S. at this time. Residue testing of incoming product is performed in the country of origin.

13. ENFORCEMENT CONTROLS

The fifth of the five risk areas that the FSIS auditor reviewed was Enforcement Controls. These controls include the enforcement of inspection requirements and the testing program for *Salmonella* species.

13.1 Daily Inspection in Establishments

Inspection was being conducted daily in the processing establishment audited on all days on which U.S.-eligible product was produced.

13.2 Testing for *Salmonella* in Raw Product

No Belgian slaughter facilities were certified as eligible to export to the U.S. at this time. Therefore, the establishment was not required to meet the FSIS regulatory requirements for *Salmonella* testing of raw product.

13.3 Species Verification

At the time of this audit, Belgium was required to test product for species verification. Species verification testing was being conducted through a subcontracting arrangement by a laboratory that did not have a technical accreditation from the Belgian accrediting agency for the specific analytical methodology used.

13.4 Periodic Supervisory Reviews

During this audit, periodic supervisory reviews of the establishment audited were being performed and documented as required.

13.5 Inspection System Controls

The CCA had controls in place for restricted product, shipment security, including shipment between establishments, and prevention of commingling of product intended for export to the U.S. with product intended for the domestic market.

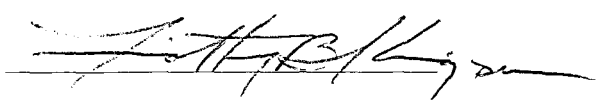
In addition, controls were in place for the importation of only eligible meat from other counties for further processing, security items, shipment security, and products entering the establishments from outside sources.

14. CLOSING MEETING

A closing meeting was held on March 20, 2008, in Brussels with the CCA. At this meeting, the preliminary findings and conclusions from the audit were presented by the FSIS auditor.

The CCA understood and accepted the findings.

Timothy King, DVM
Senior Program Auditor



15. ATTACHMENTS

Individual Foreign Establishment Audit Form
Foreign Country Response to the Draft Final Report

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
N.V. Vleeswarenfabriek Deko Kiewitstraat 177 Hasselt 3500	03/19/08	B156	Belgium
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Timothy King, DVM		[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. *The HACCP plan is signed and dated by the responsible establishment individual.*	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	O
28. Sample Collection/Analysis	O
29. Records	O
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	O
31. Reassessment	O
32 Written Assurance	O

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	O
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	X
39. Establishment Construction/Maintenance	X
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. *Condemned Product Control*	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	X
52. Humane Handling	O
53. Animal Identification	O
54. Ante Mortem Inspection	O
55. Post Mortem Inspection	O
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	X
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

Date: 03/19/08 Est #: B156 (N.V. Vleeswarenfabriek Deko [P/CS]) (Hasselt, Belgium)

38/51/56 A) During operational sanitation inspection, in the packaging storage area an overhead door leading to the exterior of the establishment was observed which did not seal sufficiently to exclude the entry of rodents or insects into the establishment. [Regulatory references: 9 CFR 416.2(b)(3) and EC 64/433 Chap. I(3)]

B) During operational sanitation inspection, several areas around the exterior of the establishment had accumulations of used equipment, barrels, and debris which interfered with inspection and could act as harborages for pests. [9 CFR 416.2(a) and EC 64/433 Chap. I(3)]

39/51/56 During operational sanitation inspection, in the packaging storage area it was observed that pallets of packaging materials and unused equipment were arranged in a way that interfered with the adequate inspection of the area. [9 CFR 416.2(a) and EC 64/433 Chap. I(10)]

61. NAME OF AUDITOR

Timothy King, DVM

62. AUDITOR SIGNATURE AND DATE

3/19/08

Federal Agency
for the Safety
of the Food Chain

United States Department Of Agriculture
Food Safety and Inspection Service
Mr. Donald Smart
Director, International Audit Staff
Office of International Affairs
Washington, DC
20250

Via DHL

Contact :	Dr. Sofie Huyberechts			
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Your letter from	Your reference	Our reference	Enclosures	Date
April 16, 2008	Form 2630-9 (6/86)	PCCB/S4/SHS/230517		01/07/2008

Subject : **FSIS on-site Audit of Belgium's meat inspection system/ March 13 through March 20, 2008/ *comments report***

Dear colleague,

Concerning the Food Safety and Inspection Service (FSIS) conducted on-site audit of Belgium's meat inspection system from March 13 through March 20, 2008, you will find below the comments of the Belgian authority regarding the information in the audit report:

1) Page 1, the title:

   "Draft Final Report of an Audit carried out in Belgium covering Belgium's meat inspection system; March 13 through March 20, 2007 "
   The following correction should be made: "March 13 through March 20, 2008 "

2) Page 12, point 9.2 EC Directive 64/433

   From January 1, 2006 Directive 64/433/EC on hygiene in meat processing plants is repealed and replaced by:
   - Regulation (EC) No 852/2004 of the European Parliament and of the Council of 29 April 2004 on the hygiene of foodstuffs;
   - Regulation (EC) No 853/2004 of the European Parliament and of the Council of 29 April 2004 laying down specific hygiene rules for food of animal origin.

If there are any questions, please feel free to contact the office of International affairs.

Yours sincerely,

Ir. H. DIRICKS
Director general

Cc: Dr. J.M. DOCHY, Director general, DG Control
Ir. G. De Poorter, Director general, DG Laboratories
Maréchal, EU COM, DG Sanco, Rue Froissart 101, 1040 Brussel

.be