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

NOV 23 2005

Mr. Nick Coulson
Head, International Animal Health Division
Department for Environment Food & Rural Affairs (DEFRA)
Room 403c
IA Page Street
London
SW1P 4PQ

Dear Mr. Coulson:

The Food Safety and Inspection Service (FSIS) conducted an on-site audit of Great Britain's meat inspection system from May 23 – June 6, 2005. Enclosed is the final audit report. We have attached to the report your letter of 19 October 2005, commenting on the draft final report of the same audit.

We appreciate the actions taken by Great Britain to correct the deficiencies identified during the audit. If you have any questions regarding the FSIS audit, please contact me at my telephone number (202) 720-3781. You may also reach me at my facsimile number (202) 690-4040 or email address sally.white@fsis.usda.gov.

Sincerely,

Sally White JD

Sally White, Director
International Equivalence Staff
Office of International Affairs

Enclosure

Cc:
Besa Kotati, Minister Counselor, American Embassy London
James Hughes, Agricultural Attaché, British Embassy, Washington, DC
Canice Nolan, Agriculture, Fisheries, Food Safety and Consumer Affairs Section
European Commission Delegation, Agric./Consumer Affairs, EU Mission to the U.S.
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Country File

FINAL

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

MAY 23 THROUGH JUNE 6, 2005

Food Safety and Inspection Service
United States Department of Agriculture

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14. CLOSING MEETING

15. ATTACHMENTS TO THE AUDIT REPORT

ABBREVIATIONS AND SPECIAL TERMS USED IN THE REPORT

CCA	Central Competent Authority [Department for Environment, Food and Rural Affairs]
DEFRA	Department for Environment, Food and Rural Affairs
EC	European Commission
FSA	Food Standards Agency
MHS	Meat Hygiene Service
VPHOD	Veterinary Public Health Operations Division (of the FSA)
VMHA	Veterinary Meat Hygiene Adviser
VMD	Veterinary Medicines Directorate
OVS	Official Veterinary Surgeon
FSIS	Food Safety and Inspection Service
VEA	European Community/United States Veterinary Equivalence Agreement
PR/HACCP	Pathogen Reduction/Hazard Analysis and Critical Control Point Systems
RVA	Regional Veterinary Adviser
SSOP	Sanitation Standard Operating Procedures
SPS	Sanitation Performance Standards
E. coli	*Escherichia coli*
Salmonella	*Salmonella* species
Listeria	*Listeria monocytogenes*

1. INTRODUCTION

The audit took place in Great Britain from May 23 to June 6, 2005

An opening meeting was held on May 23, 2005, in London with the Central Competent Authority (CCA). At this meeting, the auditor confirmed the objective and scope of the audit, the audit itinerary, and requested additional information needed to complete the audit of Great Britain's meat inspection system

The auditor was accompanied during the entire audit by representatives from the CCA, the Department for Environment, Food and Rural Affairs, and/or representatives from the regional and district inspection offices, except during the audit of the Laboratory of the Government Chemist.

2. OBJECTIVE OF THE AUDIT

This audit was a routine annual audit. The objective of the audit was to evaluate the performance of the CCA with respect to controls over the slaughter and processing establishments 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, one regional inspection office, two laboratories performing analytical testing on United States-destined product, one swine slaughter/processing establishment, and one cold storage facility.

Competent Authority Visits	Headquarters	1	DEFRA office in London
Competent Authority	Region	1	MHS regional office in York
Competent Authority	Local	2	Establishment Level
Laboratories		2	
Swine slaughter/processing establishment		1	
Cold Storage Facility		1	

3. PROTOCOL

This on-site audit was conducted in four 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 the country's inspection headquarters or regional offices. The third part involved on-site visits to two establishments: one slaughter/processing establishment and one cold storage facility. The fourth part involved visits to two private laboratories. The Tetra Labs Limited was conducting analyses of field samples for the presence of generic *Escherichia coli* (*E. coli*) and *Salmonella*. The Laboratory of the Government Chemist was conducting analyses of field samples for Great Britain's national residue control program.

Program effectiveness determinations of Great Britain's inspection system focused on five areas of risk: (1) sanitation controls, including the implementation and operation of Sanitation Standard Operating Procedures, (2) animal disease controls, (3) slaughter/processing controls, including the implementation and operation of HACCP programs and a testing program for generic *E. coli*, (4) residue controls, and (5) enforcement controls, including a testing program for *Salmonella*. Great Britain's inspection system was assessed by evaluating these five risk areas.

During all on-site establishment visits, the auditor evaluated the nature, extent and degree to which findings impacted on food safety and public health. The auditor also assessed how inspection services are carried out by Great Britain 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 auditor explained to the CCA that their 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; European Commission Directive 96/22/EC of April 1996; and European Commission Directive 96/23/EC of April 1996. These directives have been declared equivalent by FSIS under the VEA.

Second, in areas not covered by these directives, the auditor would audit against FSIS requirements. FSIS requirements include daily inspection in all certified establishments, humane handling and slaughter of animals, the handling and disposal of inedible and condemned materials, species verification testing, and requirements for HACCP, SSOP, testing for generic *E. coli* and *Salmonella*.

Third, the auditor would audit against any equivalence determinations that have been made by FSIS for Great Britain under provisions of the Sanitary/Phytosanitary Agreement.

Currently, Great Britain has an equivalence determination from FSIS regarding their *Salmonella* testing program. These differences can be reviewed under Section 13.2 of this report.

4. LEGAL BASIS FOR THE AUDIT

The audit was undertaken under the specific provisions of United States 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 European Community Directives was also assessed:

- Council Directive 64/433/EEC of June 1964 entitled Health Problems Affecting Intra-Community Trade in Fresh Meat
- Council Directive 96/23/EC of 29 April 1996 entitled Measures to Monitor Certain Substances and Residues Thereof in Live Animals and Animal Products
- Council Directive 96/22/EC of 29 April 1996 entitled Prohibition on the Use in Stockfarming of Certain Substances Having a Hormonal or Thyrostatic Action and of B-agonists

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 following deficiencies were identified during the FSIS audit of Great Britain's meat inspection system conducted in March 2003. A Notice of Intent to Delist (NOID) for inadequate implementation of SSOP was given to one of the two establishments audited.

- One establishment was not adequately documenting daily operational sanitation monitoring (records were maintained once a week only). Another establishment was not maintaining records for pre-operational sanitation.
- One establishment did not have adequate controls in place to prevent the entry of rodents and other vermin in the dry storage room.
- The records documenting on-going verification (such as the calibration of process-monitoring instruments, direct observations of monitoring activities, and corrective actions) were not adequately maintained by the establishment.
- The records were not maintained at the identified critical control point for the monitoring the CCP for zero tolerance for fecal material. The entries were not made at the time the deviation occurred, and did not include the time, signature/initials and corrective actions taken in response to a deviation of critical limits by the responsible establishment employee.

The following deficiencies were identified during the FSIS audit of Great Britain's meat inspection system conducted in April 2004.

- In one establishment the receptacles (plastic bins) used for storing edible products were not conspicuously and distinctively identified. Few of these receptacles were being used for discarded packaging materials in the processing, cut-up and boning rooms.
- In one establishment the Meat Hygiene Service (MHS) inspectors were not palpating swine lungs and livers and were not incising and observing mandibular lymph nodes properly. MHS officials took corrective actions immediately and provided written instructions to those inspectors.
- The Department for Environment, Food and Rural Affairs (DEFRA) of Great Britain had initially adopted the ISO Method 6579 for *Salmonella* testing but the Allied Laboratory Services modified the method in May 2003, without notifying

the DEFRA. Dr. Alistair J Booth, Veterinary Meat Hygiene Advisor of Food Standards Agency (FSA), instructed the laboratory not to use the modified method and to start using the ISO Method 6579 immediately. The DEFRA is in the process of submitting the modified method to FSIS for equivalency determination.

6. MAIN FINDINGS

6.1 Legislation

The auditor was informed that the relevant EC Directives, determined equivalent under the VEA, had been transposed into Great Britain's legislation.

6.2 Government Oversight

6.2.1 CCA Control Systems

The CCA, the Department for the Environment, Food and Rural Affairs (DEFRA), is responsible for trade with countries outside the EU (including the U.S.). DEFRA carries out all communications with FSIS and will communicate official instructions to establishments certified to export to the United States. The International Animal Health Division of DEFRA has a working agreement with the Veterinary Public Health Operations Division (VPHOD) of the Food Standards Agency (FSA). FSA carries out the practical inspections and make recommendations for approval or de-listing to DEFRA, and ensures the correct application of FSIS requirements in the certified establishments. This function is performed by the Veterinary Meat Hygiene Advisors (VMHA) from the VPHOD of the FSA. There are eight VMHA in England, each one covering a specified area of the country. The Working Agreement with DEFRA states that the implementation of FSIS requirements is the responsibility of the VMHA and therefore all communication between DEFRA International Animal Health Division and the VPHOD of the FSA is directed to the VMHA. The Meat Hygiene Service (MHS), an executive agency of FSA, provides government veterinarians and inspectors for "approved" meat and poultry establishments (domestic and exporting) by either direct hiring or through contract services. All officials veterinarians assigned to the two establishments currently certified to export to the United States are on contract to MHS. The Veterinarian contracts are reviewed annually and renewed every three years by FSA. The FSA has the authority to cancel the contracts with veterinarians at any time if it is deemed necessary. The Chief Executive of the MHS reports to the FSA Director of Enforcement and it is agreed that instructions for the establishment's Official Veterinarian (OV) and Regional Veterinary Advisor (RVA), in relation to FSIS requirements, will come directly from the VMHA. The official veterinarians and inspectors report directly to the RVAs, which are stationed throughout Great Britain.

6.2.2 Ultimate Control and Supervision

DEFRA, as the CCA, has the authority to remove establishments from the list of establishments certified to export to the U.S., and refuse the issuance of veterinary health certificates to prohibit exports from taking place. The decision as to whether the

establishment is failing to meet U.S. requirements and the recommendation that de-listing should occur is the responsibility of the VMHA, who would reach his/her decision after considering reports from the OV and the RVA and carrying out an audit of the establishment.

6.2.3 Assignment of Competent, Qualified Inspectors

All veterinarians and meat inspectors working in Great Britain's establishments must be fully qualified in accordance with legislative and instructional requirements. Veterinarians have to attend an intensive two-week training course as well as participate in on-the-job training with experienced veterinarians. Meat inspectors must undergo training in accordance with the requirements of EU Directive 64/433/EEC, Annex III for veterinary auxiliaries (400 hours theoretical and 200 hours practical instructions) and must have passed an examination before being authorized to work in meat establishments. Since the adoption of EU Commission Decision 2001/471/EC requiring the introduction of controls based on HACCP Principles, the MHS has initiated a program of HACCP training for all its employees.

- Training programs for inspectors in PR/HACCP and SSOP system implementation, *E. coli*, *Salmonella*, and *Listeria monocytogenes* testing were conducted since the last audit.

6.2.4 Authority and Responsibility to Enforce the Laws

DEFRA, as the CCA, can remove establishments certified to export to the United States if FSIS requirements are not met. Monitoring of these requirements is carried out by VMHA and RVA from the MHS under the requisite schedule of visits (annually by the VMHA and monthly by the RVA when exports are taking place). Additional visits are carried out as necessary when there are adverse reports from the plant OV. De-listing would be carried out by DEFRA International Animal Health Division on a recommendation from the VMHA.

MHS has the authority and responsibility to enforce the applicable laws relevant to U.S. certified establishments. The Regional Veterinary Advisors (RVAs) are in charge of verifying and evaluating the implementation of the official directives, guidelines and instructions. The following deficiencies were noted:

- In the two establishments audited, the FSIS/EC regulatory requirements were not enforced adequately by the CCA. In the both establishments the Sanitation Performance Standards were not implemented.

6.2.5 Adequate Administrative and Technical Support

During the audit, the auditor found that the CCA has administrative and technical support to operate Great Britain's inspection system and has the resources and ability to support a third-party audit.

6.3 Headquarters Audit

The auditor conducted a review of inspection system documents at the headquarters in London. The records review focused primarily on food safety hazards and included the following:

- Internal review reports.
- Supervisory visits to establishments that were certified to export to the U.S.
- Training records for inspectors and laboratory personnel.
- New laws and implementation documents such as regulations, notices, directives and guidelines.
- Sampling and laboratory analyses for residues and microbiology.
- Sanitation, slaughter and processing inspection procedures and standards.
- Control of inedible and condemned materials.
- Export product inspection and control including export certificates.
- Enforcement records, including examples of control of noncompliant product, and withholding, suspending, withdrawing inspection services from or delisting an establishment that is certified to export product to the United States.

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

6.3.1 Audit of Regional and Local Inspection Sites

Regional Offices

The FSIS auditor reviewed one regional Meat Hygiene Service (MHS) office in York and interviewed the regional director. The purpose of the interview was to review the meat inspection records and determine the level of government oversight and control provided by the regional offices relative to the certified establishments.

The auditor concluded that:

- All relevant regulations, notices, and other inspection documents and records were adequately disseminated from headquarters through the regional offices to the two certified establishments (local inspection sites). This was accomplished by both hard copy and e-mails.
- Copies of all relevant regulations, notices, and other inspection documents and records were maintained at the regional offices.
- POV supervisor was knowledgeable of U.S. import requirements relative to the two certified establishments producing or exporting meat to the United States.
- The regional official demonstrated adequate administrative assistance to ensure that official inspection personnel were assigned to the two certified establishments.
- Records for training programs for inspectors in PR/HACCP and SSOP system implementation, *E. coli*, and *Salmonella* testing were reviewed.

The auditor found that the instructions had been received and implemented by the regional office visited.

Local Inspection Sites (Certified Establishments)

The FSIS audit team reviewed Great Britain's meat inspection records maintained at the local inspection sites certified to produce or export meat to the United States. In addition, the audit team interviewed the senior veterinarians (OVs) at each establishment and their inspection teams, which consisted of veterinary officers, senior meat inspectors and meat inspectors.

The auditor concluded that:

- All relevant regulations, notices, and other inspection documents and records were adequately disseminated from headquarters through the regional offices to the two local inspection sites. This was accomplished by both hard copy and e-mails.
- Inspection personnel demonstrated adequate knowledge of inspection requirements relative to the export and distribution of meat to the United States.

7. ESTABLISHMENT AUDITS

The FSIS auditor visited a total of two establishments. One was a slaughter/processing establishment and one was a cold storage facility. No establishments were delisted by DEFRA.

Specific deficiencies are noted on the attached individual establishment reports.

8. RESIDUE AND MICROBIOLOGY LABORATORY AUDITS

During the laboratory audits, emphasis was placed on the application of procedures and standards that are equivalent to United States' 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.

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 United States samples, the auditor evaluated compliance with the criteria established for the use of private laboratories under the PR/HACCP requirements.

The following laboratories were reviewed:

- The Laboratory of the Government Chemist is a private laboratory, located in Middlesex, which conducts analyses of field samples for Great Britain's national residue control program.

- The Tetra Labs Limited is a private laboratory, located in Grimsby, which conducts analyses of field samples for the presence of *Salmonella* species and generic *Escherichia coli* (*E .coli*)

The findings at the Laboratory of the Government Chemist and the Tetra Labs Limited will be discussed in Section 12 (Residue Controls).

9. SANITATION CONTROLS

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

Based on the on-site audits of establishments, and except as noted below, Great Britain'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, and except as noted below, Great Britain's inspection system had controls in place for water potability records, chlorination procedures, back-siphonage prevention, separation of operations, temperature control, work space, ventilation, ante-mortem facilities, welfare facilities, and outside premises.

9.1 SSOP

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOP were met, according to the criteria employed in the United States' domestic inspection program. The SSOP in the both establishments were found to meet the basic FSIS regulatory requirements. The Sanitation Performance Standards (SPS) were not effectively implemented in both establishments audited.

- Rust was observed on the overhead structure in the cutting room and the carcass coolers. This deficiency was scheduled for correction by the inspection service and establishment officials.
- Dust and cobwebs were identified in the annex used for dry storage.
- Walls needed repair in various areas because inner side was broken or damaged in the annex used for dry storage.
- Establishment employees working in contact with product, food-contact surfaces, and product packaging materials did not adhere to the appropriate hygienic practices by wearing their work uniforms in the toilet rooms of the establishment and then returning to production areas inside the establishment without changing work uniforms.
- In the men's locker room, the separation of street and work clothes was not maintained. Some clean working uniforms were was touching the floor because the hanging racks were too short. Possible cross-contamination was evident.
- A gap was identified between the floor and door seal of a loading dock that was large enough to allow potential entry of pests and other rodents from the outside.

- The bumper cushions around the loading dock were damaged, resulting in an incomplete seal when delivery trucks were backed-up for loading. Approximately two inches of daylight could be seen between the loading bay and the rear of the truck, a space through which rodents or other pests could easily enter.
- The exposed insulation was due to broken wall in some areas and around the emergency exit door in one of the freezers.
- The employees' locker room was unsanitary. Some lockers needed repair because they were dented or rusty.

9.2 EC Directive 64/433

In both establishments, the provisions of EC Directive 64/433 were effectively implemented.

In both establishments, the specific deficiencies are noted in the attached individual establishment reports.

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. The auditor determined that Great Britain's inspection system had adequate controls in place. No deficiencies were noted.

There had been no outbreaks of animal diseases with public health significance since the last FSIS audit. APHIS declared Great Britain free of Rinderpest and FMD effective December 17, 2002, although subject to special export conditions. APHIS also declared Great Britain free of Swine Vesicular Disease.

The importation of beef or beef products into the United States from Great Britain was not allowed at the time of this audit due to the presence of BSE in the United Kingdom.

11. SLAUGHTER/PROCESSING CONTROLS

The third of the five risk areas that the FSIS auditor reviewed was 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 testing program for generic *E. coli* in slaughter establishments.

11.1 Humane Handling and Humane Slaughter

No deficiencies were noted.

11.2 HACCP Implementation

All establishments approved to export meat products to the United States are required to have developed and adequately implemented a HACCP program. Each of these programs was evaluated according to the criteria employed in the United States' domestic inspection program.

The HACCP programs were reviewed during the on-site audit of the slaughter/processing establishment. One establishment was a cold storage facility and was not required to have a HACCP program. The establishment that was required to meet the HACCP program requirements had adequately implemented the HACCP requirements.

11.3 Testing for Generic *E. coli*

Great Britain has adopted the FSIS regulatory requirements for testing for generic *E. coli.*

One of the two establishments audited was required to meet the basic FSIS regulatory requirements for testing for generic *E. coli* and was evaluated according to the criteria employed in the United States' domestic inspection program.

Testing for generic *E. coli* was properly conducted in this establishment and no deficiencies were noted.

11.4 Testing for *Listeria monocytogenes*

Neither of the establishments audited were producing ready-to-eat products for export to the United States and were not required to meet the FSIS requirements for *Listeria monocytogenes* testing. Great Britain is only exporting fresh pork ribs to the United States.

11.5 EC Directive 64/433

In both of the establishments audited, the provisions of EC Directive 64/433 were effectively implemented.

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.

- The Laboratory of the Government Chemist, located in Middlesex (London), is a private laboratory. For all sample analyses, the turn around time limit is 28 days. The lab was meeting this limit 80% of the times instead of 90% as required by the Veterinary Medicines Directorate.

Great Britain's National Residue Control Program for 2005 was being followed and was on schedule.

12.1 FSIS Requirements

Great Britain inspection officials had adequate controls in place to ensure compliance with sampling and reporting procedures and storage and use of chemicals. The methods used for the analyses were acceptable.

12.2 EC Directive 96/22

In the Laboratory of the Government Chemist, the provisions of EC Directive 96/22 were effectively implemented.

12.3 EC Directive 96/23

In the Laboratory of the Government Chemist, the provisions of EC Directive 96/23 were effectively implemented.

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*.

In both establishments, the FSIS/EC regulatory requirements were not adequately enforced by the CCA, which was illustrated by the following findings:

- Rust was observed on the overhead structure in the cutting room and the carcass coolers.
- Dust and cobwebs were identified and the walls needed repair in various areas because inner side was broken or damaged in the annex dry storage room.
- Establishment employees working in contact with product, food-contact surfaces, and product-packaging materials did not adhere to hygienic practices by the wearing of work uniforms in the toilet rooms of the establishment and then returning to production areas inside the establishment without changing work uniforms

13.1 Daily Inspection in Establishments

Inspection was being conducted daily in all slaughter and processing establishments.

13.2 Testing for *Salmonella*

Great Britain has adopted the FSIS requirements for testing for *Salmonella* with the exception of the following equivalent measure(s).

- The establishment takes the samples.

- A private laboratory analyzes the samples.

One of the two establishments audited was required to meet the basic FSIS regulatory requirements for *Salmonella* testing and was evaluated according to the criteria employed in the United States' domestic inspection program. *Salmonella* testing was performed by using the alternative *Salmonella* Testing Method. Great Britain had submitted the alternative *Salmonella* method to FSIS for equivalence determination before the audit. A decision is still pending.

13.3 Species Verification

Species verification was being conducted in those establishments in which it was required.

13.4 Monthly Reviews

During this audit it was found that in all establishments visited, monthly supervisory reviews of certified establishments were being performed and documented as required.

13.5 Inspection System Controls

The CCA had controls in place for ante-mortem and post-mortem inspection procedures and dispositions; restricted product and inspection samples; disposition of dead, dying, diseased or disabled animals; shipment security, including shipment between establishments; and prevention of commingling of product intended for export to the United States with product intended for the domestic market.

In addition, controls were in place for the importation of only eligible meat products from other counties for further processing.

Lastly, adequate controls were found to be in place for security items, shipment security, and products entering the establishments from outside sources.

14. CLOSING MEETING

A closing meeting was held on June 6, 2005, in London with the CCA and by teleconference with a member of the European Commission in Brussels. At this meeting, the primary findings and conclusions from the audit were presented by the auditor.

The CCA understood and accepted the findings.

Manzoor H. Chaudry, DVM
Chief, International Audit Staff

15. ATTACHMENTS TO THE AUDIT REPORT

Individual Foreign Establishment Audit Forms
Foreign Country Response to Draft Final Audit 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
ABP Connect – Cold Storage Limited Corporation Road, King George Dock Hedon Road, HULL HU9 5NF GB	05/27/05	UK2182	Great Britain
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. Manzoor H. Chaudry		[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 SSOPs 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 .	O
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	O
16. Records documenting implementation and monitoring of the HACCP plan.	O
17. The HACCP plan is signed and dated by the responsible establishment individual.	O
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	O
19. Verification and validation of HACCP plan.	O
20. Corrective action written in HACCP plan.	O
21. Reassessed adequacy of the HACCP plan.	O
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	O
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)	O
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	O
34. Species Testing	
35. Residue	O
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
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*	X
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	
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

Establishment # UK2182 Audit Date 05/27/05 Cold Storage

39/51/56 1. A gap identified between floor and door seal of loading dock which was large enough to allow potential entry of pests and other rodents from the outside. 9 CFR 416.2 (2), Dir 64/433 EEC, Annex I, Chapter II (m)

2. The bumper cushions around the loading dock were damaged, resulting in an incomplete seal when delivery trucks were backed-up for loading. Approximately two inches of daylight could be seen between the loading bay and the rear of the truck, a space through which rodents or other pests could easily enter. 9 CFR 416.2 (2), Dir 64/433/EEC, Annex I, Chapter II (m)

3. The exposed insulation was due to broken wall in some areas and around the emergency exit door in one of the freezers 9CFR 417.4 (b), EC Dir 64/433, Chapter III (m)

47/51/58 Employees' locker room unsanitary. Some lockers needed repair because they were dent or rusty 9CFR 417.5 (b) EC Dir 64/433, Chapter III, (3).

61. NAME OF AUDITOR
Dr. F. Choudry & Dr. M. Chaudry

62. AUDITOR SIGNATURE AND DATE
Manzoor H. Chaudry 6/9/05

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
Grampian Country Pork Limited Parliament Street Norton, Malton, North Yorkshire	05/26/05	UK 2060	Great Britain
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. Manzoor H. Chaudry		[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	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

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

60. Observation of the Establishment

Establishment # UK 2060 Dated 05/26/05 Slaughter/processing operation

45/51/56 Rust was observed on the overhead structure in the cutting room and the carcass coolers. This deficiency was scheduled for correction by the inspection service and establishment officials 9 CFR 416.4 (b); EC Dir. 64/433, Chapter III, 3 (c).

46/51/56 1. Dust and cobwebs were identified in the annex used for dry storage.
2. Walls needed repair in various areas because inner side was broken or damaged in the annex used for dry storage 9CFR 417.4 (b), EC Dir 64/433, Chapter III (3)

47/51/56 1. Establishment employees working in contact with product, food-contact surfaces, and product-packaging materials did not adhere to hygienic practices by the wearing of work uniforms in the toilet rooms of the establishment and then returning to production areas inside the establishment without changing work uniforms 9CFR 417.5 (b) EC Dir 64/433, Chapter III, (3).

2. In men's locker room, the separation of street and work clothes was not maintained. Some clean working uniforms were was touching the floor because the hanging racks were too short. Possible cross-contamination was evident 9 CFR 416.5 (b); EC Directive 64/433, Chapter III (3).

61. NAME OF AUDITOR
Dr. Manzoor H. Chaudry

62. AUDITOR SIGNATURE AND DATE
Manzoor H. Chaudry 6/9/05

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Department for Environment
Food and Rural Affairs

Your reference:
Our reference: EXM 1639

(By fax: 00 1 202 690 4040)

Dr Sally White
Director
International Equivalence Staff
Office of International Affairs
USDA FSIS
1400 Independence Avenue
Washington, D.C. 20250

19 October 2005

Dear Dr White

USDA FSIS AUDIT OF MEAT INSPECTION SYSTEM IN GREAT BRITAIN 23 MAY – 6 JUNE 2005

Thank you for your letter of 11 August 2005, which was received at this office on 23 August, enclosing the draft final report of the FSIS audit of our meat inspection system.

We have carried out a review of the report together with colleagues from the Food Standards Agency, the Meat Hygiene Service and the Veterinary Medicines Directorate. In general, we have few comments or objections regarding Dr Choudry's findings, but would like to draw your attention to the following observations in respect of the draft report:

Page 13 – Section 13.5. Inspection System Controls

In section 13.5 of the draft report there is a statement *'with the exception of the deficiency noted in section 11.5'*. However, no deficiencies are listed in section 11.5. of this report. We believe that this statement refers to the 2004 report and that it may have been transposed inadvertently to the 2005 version.

Page 14 – Section 12. Residue Controls

Dr Choudry commented that the target of a 28 day turnaround time for sample analysis at the Laboratory of the Government Chemist (LGC) was achieved for 80% of samples instead of the 90% required by the Veterinary Medicines Directorate. This issue has now been resolved to the satisfaction of the VMD and was due to equipment availability issues at the LGC. LGC did keep VMD advised at the time and set contingency measures in place to manage the situation.

Section 12.1 of the report also contains the sentence *'The methods used for the analysis were acceptable, except in the Reference Laboratory of the Government Chemist'*. I have received an assurance that no reference to this problem was made during or after the audit at LGC, nor during the final meeting at Page Street. I wonder, therefore, if this sentence should be deleted from the 2005 draft report.

Foreign Establishment Audit Checklist – Grampian Country Pork Ltd.

In the checklist for Grampian, Malton, a non-compliance has been recorded at No. 58 (testing for *Salmonella*). No comments regarding the non-compliance are recorded on page 2 of the checklist or in section 13.2 of the report relating to the *Salmonella* testing programme.

We would like to seek clarification whether this non-compliance reflects the fact that a decision on equivalence determination on the revised *Salmonella* testing method is still pending. If this is not the case, we believe that there are no grounds for recording a non-compliance and that the 'X' in No. 58 of the Grampian checklist should be deleted.

Separation of Fresh Meat and Cooked and Cured Products Operations at Grampian Country Pork

Work to ensure separation of the USDA-approved slaughterhouse and cutting areas from the non-approved meat products has been completed. Physical separation has been achieved as far as possible by construction of new walls and barriers. A permanently supervised designated transfer area has been created in the one remaining location where the provision of a permanent barrier would effectively prevent the continued operation of the processing and products areas of the factory. Complete physical separation of the two areas of the factory will be achieved using one-way opening doors located at the transfer area.

FSIS Audit of Great Britain for 2006

We have now received from DG SANCO a copy of the proposed itinerary for the 2006 FSIS Audits of European Union Member States. We look forward to welcoming the FSIS team for the audit of the meat inspection system in Great Britain from 8 March - 24 March 2006.

Once again, we are grateful for the opportunity to comment on the draft report and I look forward to receiving a copy of the final report in due course. If you have any outstanding concerns, I should be grateful if you would contact me.

Kind regards.

Yours sincerely

Nick Coulson

Dr Nick Coulson
Head, International Animal Health Division

cc: Steve Knight, US Embassy, London (by fax: 020 7894 0031)
James Hughes (e-mail: James.Hughes@fco.gov.uk)