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

Mr. Patrick J. Rogan
Chief Veterinary Officer
Department of Agriculture and Food and Rural Development (DAFRD)
Kildare Street
Dublin 2
Ireland

MAR - 3 2009

Dear Mr. Rogan:

The Food Safety and Inspection Service (FSIS) conducted an on-site audit of Ireland's meat inspection system May 13 through May 29, 2008. Comments from the government of Ireland have been included as an attachment to the final report. Enclosed is a copy of the final audit report. We apologize for the delay in the submission of this report

If you have any questions regarding the FSIS audit or need additional information, please contact me at telephone number (202) 205-3873, by facsimile at (202) 720-0676, or electronic mail at manzoor.chaudry@fsis.usda.gov.

Sincerely,

/s/ Manzoor H. Chaudry
Manzoor Chaudry, DVM
Deputy Director
International Audit Staff
Office of International Affairs

Enclosure

FINAL REPORT OF AN AUDIT CARRIED OUT IN THE REPUBLIC OF IRELAND COVERING THE REPUBLIC OF IRELAND'S MEAT INSPECTION SYSTEM

MAY 13 THROUGH May 29, 2008

Food Safety and Inspection Service
United States Department of Agriculture

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ABBREVIATIONS AND SPECIAL TERMS USED IN THE REPORT

CCA	Central Competent Authority, the Department of Agriculture, Fisheries and Food (DAFF)
CVO	Chief Veterinary Officer
DAFF	Department of Agriculture, Fisheries and Food
E. coli	*Escherichia coli*
FSIS	Food Safety and Inspection Service
HACCP	Hazard Analysis and Critical Control Point Systems
NOID	Notice of Intent to Delist
RSVI	Regional Superintending Veterinary Inspector
RVO	Regional Veterinary Officer
Salmonella	*Salmonella* species
SPS	Sanitation Performance Standards
SSOP	Sanitation Standard Operating Procedure(s)
SVI	Superintending Veterinary Inspector
SSVI	Senior Superintending Veterinary Inspector
SVO	Senior Veterinary Officer
SVS	State Veterinary Service
TVI	Temporary Veterinary Inspector
VEA	European Community/United States Veterinary Equivalence Agreement
VI	Veterinary Inspector
VPHIS	Veterinary Public Health Inspection Service

1. SUMMARY

1.1 Description/Eligibility

This report summarizes the outcome of the audit conducted in the Republic of Ireland from May 13 through May 29, 2008. This was a routine audit. The Republic of Ireland is eligible to export meat products to the United States. Between January 1, 2007, and April 30, 2008, the Republic of Ireland exported more than 6.7 million pounds of meat products to the United States, of which 2.1 million pounds were reinspected at US ports of entry (POE). A total of 67,836 pounds were rejected at POE; no rejections were for food-safety concerns. The activities of the current audit appear in the table below.

1.2 Comparison of the Current Audit and the Previous Audit

		05/13-05/29, 2008	06/01-06/13, 2007
Levels of Government Oversight Audited			
	Headquarters	1	1
	Regional	2	1
	Establishment Level	3	1
Laboratories Audited			
	Microbiology	1	1
	Residue	2	2
Establishments Audited			
	Slaughter/processing	2	1
	Processing	1	0
	ID Warehouses	0	0
Enforcement Actions Initiated			
	NOID	1	0
	Delistment	0	0
Risk Area Findings		(3 Ests. audited)	(1 Est. audited)
	Sanitation Controls (SSOP, SPS)	3	1
	Animal Disease Controls	0	0
	Slaughter/Processing (PR/HACCP)	3	0
	Residue Controls	2	0
	Microbiology Controls	0	0
	Inspection/Enforcement Controls	3	0
	Generic *E. coli* testing	1	0
	General Labeling	1	0

2. INTRODUCTION

The audit took place in the Republic of Ireland from May 13 through May 29, 2008. An opening meeting was held on May 13, 2008, in Dublin with the Central Competent Authority (CCA). At this meeting, the auditor confirmed the objective and scope of the audit, the auditor's itinerary, and requested additional information needed to complete the audit of Ireland's meat inspection system.

The auditor was accompanied during the entire audit by representatives from the CCA, the Department of Agriculture, Fisheries and Food (DAFF), and/or representatives from the regional and local inspection offices.

3. OBJECTIVE OF THE AUDIT

This was a routine audit with special emphasis on humane handling and slaughter of livestock. 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.

4. 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, regional, and local government offices. The third part involved on-site visits to two swine slaughter establishments and one meat processing establishment. The fourth part involved visits to two government residue laboratories and one private microbiology laboratory.

Program effectiveness determinations of Ireland's inspection system focused on five areas of risk: (1) sanitation controls, including the implementation of Sanitation Standard Operating Procedures (SSOP) and Sanitation Performance Standards (SPS), (2) animal disease controls, (3) slaughter/processing controls, including the implementation of Hazard Analysis and Critical Control Point (HACCP) programs, (4) residue controls, and (5) enforcement controls. Ireland'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 Ireland 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 under the VEA.
Second, in areas not covered by these directives, the auditor would audit against FSIS requirements. These include daily inspection in all certified establishments, humane handling and slaughter of livestock, the handling and disposal of inedible and condemned

materials, species verification, and FSIS's requirements for HACCP, SSOP, and testing for generic *Escherichia Coli (E. coli)/Enterobacteriaceae* and *Salmonella* species (*Salmonella*).

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

Currently, Ireland has adopted FSIS requirements for *Salmonella* testing performed in conjunction with pathogen reduction standards, with the following exceptions:

- Private laboratories analyze the samples.
- Establishment employees collect the samples for *Salmonella*.
- ISO 6579:2002 method is used to detect *Salmonella*.

In addition, FSIS has determined that analysis of *Enterobacteriaceae* and Total Viable Count in lieu of testing for generic *E. coli* is acceptable for all EU exporting countries.

5. 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, April 29, 1996, entitled "Measures to Monitor Certain Substances and Residues Thereof in Live Animals and Animal Products."
- Council Directive 96/22/EC, April 29, 1996, entitled "Prohibition on the Use in Stockfarming of Certain Substances Having a Hormonal or Thyrostatic Action and of ß-agonists."

6. 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 last two FSIS audits of Ireland were held May 25 through June 15, 2005, and June 1 through June 13, 2007.

The following findings were reported during the 2005 FSIS audit:

- Three establishments had not fully implemented SSOP requirements.

- One establishment was shipping swab samples for *Salmonella* analysis to a private laboratory in Wexford, which was not approved to handle United States-eligible samples.

The following findings were cited in one establishment during the 2007 FSIS audit:

- Pieces of fat, meat scraps and grease were observed on several meat-contact areas (a conveyor belt, a cutting board and a knife holder) in the cutting room during pre-operational sanitation inspection.

- Several deep cuts were observed on the conveyor belt for edible product in the meat cutting room during operational sanitation inspection.

7. MAIN FINDINGS

7.1 Legislation

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

7.2 Government Oversight

7.2.1 CCA Control Systems

The Central Competent Authority (CCA), the Department of Agriculture, Fisheries and Food (DAFF), is responsible for direct oversight of Ireland's export meat inspection system, farm animal health and welfare, and for safety of foods of animal origin, including the control of residues. The primary responsibility is vested with the Minister of Agriculture, Fisheries and Food. The State Veterinary Services (SVS) of the DAFF advise the Minister on matters of animal health and disease, zoonoses, and public health as they relate to food and products of animal origin.

Ireland's meat inspection system is organized on three levels: Central, regional, and local.

The first level is the central office (headquarters) in Dublin. The Chief Veterinary Officer (CVO) and a management team of Senior Veterinary Officers (SVO) are based in the Agriculture House. The SVOs consist of a Deputy CVO, two Senior Superintending Veterinary Inspectors (SSVI), and five Superintending Veterinary Inspectors (SVI). The Deputy CVO is in charge of the Veterinary Public Health Inspection Service (VPHIS).

The second level encompasses six Regional Veterinary Public Health Inspectorate Regions (Northeast, Northwest, Southeast, Southwest, East, and South). Each regional office is under the supervision of a Regional Superintending Veterinary Inspector (RSVI) who oversees the implementation of veterinary controls in meat establishments under his/her jurisdiction, and reports directly to headquarters.

The Veterinary Offices located in each of the United States-certified establishments form the third level of control. Each office has a Veterinary Inspector (VI) who is in charge of inspection activities in the establishment. The VI has direct supervision over all other inspection personnel assigned to the certified establishment, including Temporary Veterinary Inspectors (TVI) and Technical Agricultural Officers (TAO).

7.2.2. Ultimate Control and Supervision

The VPHIS of DAFF has ultimate control over the slaughtering of livestock and production of food products derived from animals.

The RSVI and the VI oversee the maintenance of eligibility to export to the United States. They have the authority, under Ireland's legislation, to enforce the necessary requirements to export to another country. Their duties also include initiating investigations into failure on the part of an establishment to meet the standards of the importing country and prohibit exports if appropriate.

The VI in certified establishments performs the daily supervision of establishment activities. The VI reports directly to the RSVI who performs the periodic supervisory reviews.

All inspection personnel assigned to the establishments certified to export meat to the United States are full-time government employees receiving no remuneration from either industry groups or establishment personnel.

7.2.3 Assignment of Competent, Qualified Inspectors

The CCA is responsible for the initial hiring, training, and payment of inspection personnel.

Slaughterhouses and meat processing establishments are supervised by VIs who are permanently located in all the larger slaughter and processing establishments. VIs are responsible for ante and post-mortem inspection, verification of sanitation and HACCP programs, inspection of structural and hygiene standards, controls for animal welfare, and animal identification. There are 66 VIs within VPHIS.

There are approximately 705 private veterinary practitioners who serve as TVIs. They carry out meat inspection duties (ante and post-mortem inspection) in slaughterhouses.

Temporary Veterinary Inspectors, before being engaged, must undergo a period of on-the-job training under the supervision of the full-time VI. The TVIs are under direct supervision of the VIs.

There are approximately 247 Technical Agricultural Officers who assist the VI in duties other than ante and post-mortem inspection activities. All TAOs are trained in the specifications of the Food Hygiene Regulations, microbiology, and HACCP.

The FSIS requirements are distributed by e-mail or hardcopy from DAFF headquarters to the regionally-based SVI and VIs. All FSIS requirements are on an internet site which is readily available to Ireland's inspection personnel.

7.2.4 Authority and Responsibility to Enforce the Laws

The DAFF has the legal authority and the responsibility to enforce all FSIS requirements. The VI and other qualified in-plant inspection personnel are authorized to enforce European Commission legislation and the United States import requirements. Through legal process in the courts, DAFF has the authority to suspend and/or delist the United States-certified establishments to prevent the export of non-conforming product.

VIs have been given the necessary authority, under national legislation S.I. No. 910 and EU Regulations, to take appropriate enforcement actions in the case of non-compliance or breaches of the regulations. Criminal prosecution is specified in legislation.

Non-compliances are categorized according to the risk to the consumer:

- Major non-compliances are those which constitute serious and immediate threats to public health. In these cases, the VI may suspend production or prohibit the use of all or part of the establishment or equipment until the risk has been eliminated.
- Minor (Category 2) non-compliances are deficiencies deemed to pose potential threats to public health. In these cases, the VI serves a notice requiring the owner or person in charge of the establishment to correct the deficiencies within a specific time scale.
- Minor (Category 3) non-compliances do not pose threats to public health.

The VI can suspend an United States-certified establishment for non-compliance. Delistments are done at headquarters in consultation with the CVO, the Deputy CVO, and the SSVI.

7.2.5 Adequate Administrative and Technical Support

The CCA has the resources and ability to support a third-party audit and has adequate administrative and technical support to operate Ireland's meat inspection system.

Administration, development, coordination, and the formation of rules and regulations take place at DAFF headquarters in Dublin.

7.3 Headquarters and Veterinary Public Health Regional Offices Audit

The auditor conducted a review of inspection system documents at DAFF headquarters in Dublin. The auditor also interviewed inspection officials in Waterford and Limerick Veterinary Public Health Regional Offices for the purpose of determining the level of government oversight, supervisory structure, and to review records pertinent to the United States certified establishments. The records review focused primarily on food safety hazards and included the following:

- Government oversight documents, including organizational structure.
- Periodic supervisory visits.
- Training programs and personnel records of training.
- Requirements for employment and payment records of inspection personnel.
- New laws and implementation documents such as regulations, notices, directives, and guidelines.
- Assignment of inspectors, staffing, and inspection coverage of the United States certified establishments.
- Inspection records and enforcement actions such as withholding, suspending, or withdrawing inspection services from or delisting an establishment certified to export product to the United States.
- Organization of the country's laboratory system.
- Microbiology and residue sampling and laboratory analyses.
- Export product inspection and control including export certificates.
- Sanitation, slaughter and processing inspection procedures and standards.
- Control of inedible and condemned materials.
- Funding of Ireland's inspection program.

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

8. ESTABLISHMENT AUDITS

The FSIS auditor visited two swine slaughter establishments and one meat processing establishment. While no establishments were delisted, one establishment received a Notice of Intent to Delist (NOID) from the CCA. The NOID was issued for deficiencies concerning SSOP, HACCP, generic *E. coli* testing methodology, and post-mortem inspection procedures.

This establishment may retain certification for export to the United States provided that all deficiencies reported during the audit are corrected within 30 days of the date the establishment was reviewed.

Specific deficiencies are noted in the attached individual establishment checklists.

9. RESIDUE AND MICROBIOLOGY LABORATORY AUDITS

During laboratory audits, emphasis is 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, and intra-laboratory check sample 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 sample programs.

Two government residue laboratories and one private microbiology laboratory were audited:

1) The Ashtown Research Central is a semi-state residue laboratory, located in Dublin, which conducts analyses of field samples for Ireland's national residue program. This laboratory has received ISO Standard 17025 accreditation.

The following findings were reported:

- The sample reception book did not include all the required information as written in the quality control manual.
- The official standards book for preparation of stock solution did not contain the signature or date of verification by the responsible supervisor.
- A standard preparation calculation sheet did not include the date or signature of the analyst making the calculation.
- Cross-outs and overwrites were not initialed or dated by the person making the correction.

2) The DAFF Pesticide Control Laboratory is a government laboratory, located in Kildore, which conducts analyses of field samples for Ireland's national residue monitoring program. This laboratory has received ISO Standard 17025 accreditation.

The following findings were reported:

- Hand-written information on a print-out did not include the date or the signature of the person entering the information.
- Cross-outs and overwrites were not initialed or dated by the person making the correction.

3) Enfer Micro Laboratories Ltd. is a private laboratory, located in Clonmel, which conducts analyses of field samples for the presence of *Salmonella* species and generic *E. coli*. This laboratory has received ISO Standard 17025 accreditation. No deficiencies were reported.

10. SANITATION CONTROLS

As stated earlier, FSIS auditors focus on five areas of risk to assess an exporting country's meat 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, Ireland'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 practices, and good product handling and storage practices.

In addition, Ireland's inspection system had controls in place for light, back-siphonage prevention, temperature control, ante-mortem facilities, ventilation, plumbing and sewage, water supply, dressing rooms/lavatories, welfare facilities, outside premises and condemned product control.

10.1 Sanitation Standard Operating Procedures (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 all three establishments were found to meet the basic FSIS regulatory requirements, with the following deficiencies:

- In two establishments, meat product residues and/or unidentified black color particles from the previous day's production were observed on plastic interlock conveyors in the cutting room. The conveyors were ready to use for the day's production of food products.
- In one establishment, several white color plastic tubs used to transport meat products were identified with product residues from the previous day's production.
- In one establishment, documentation of corrective actions taken in response to deficiencies identified during pre-operational and operational sanitation did not include all three parts of the corrective actions.
- In one establishment, neck and jowls of contaminated hog carcasses (on the detain line) were contacting employees' work platforms in the slaughter room. In one establishment, an establishment employee was handling edible products without washing or sanitizing her hands after touching nonfood contact surfaces in the processing room.

Specific deficiencies are reported in the attached individual establishment checklists.

10.2 Sanitation Performance Standards (SPS)

- In one establishment, maintenance of overhead structures above exposed product and equipment had been neglected with a build-up of rust on the carcass cooler's rails and numerous holes in the cutting room ceiling.

Specific deficiencies are reported in the attached individual establishment checklists.

10.3 EC Directive 64/433

In two establishments, all provisions of EC Directive 64/433 were not effectively implemented.

Specific deficiencies are noted in the attached individual establishment checklists.

11. ANIMAL DISEASE CONTROLS

The second of the five risk areas that the FSIS auditor reviewed was Animal Disease Controls. These 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 Ireland's inspection system had adequate controls in place. No deficiencies were reported.

There had been no outbreaks of animal diseases with public health significance since the last FSIS audit.

12. SLAUGHTER/PROCESSING CONTROLS

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

In all three establishments, FSIS requirements regarding general labeling were effectively implemented with the exception of the following deficiency:

- In one establishment, there were three holding containers full of product and without proper identification in the blast freezer.

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.

12.1 Humane Handling and Slaughter

No deficiencies were reported.

12.2 HACCP Implementation

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

The HACCP programs were reviewed during the on-site audit of three establishments. The HACCP plans in these establishments were found to meet basic FSIS regulatory requirements with the following exceptions:

- In two establishments, the written HACCP plan did not contain a description of the verification procedures (calibration of process-monitoring instruments and direct observation of monitoring activities) and the frequency with which those procedures were to be performed.
- In one establishment, the HACCP plan did not address the frequency of the verification procedures.
- In one establishment, verification records for CCP1 did not document the type of the verification procedures performed and the results of the verification.
- In all three establishments, the HACCP verification records for the calibration of process-monitoring instruments did not document the times when the specific events occurred and/or the quantifiable values.
- In one establishment, the HACCP plan did not include all four parts of corrective actions taken in response to any deviation from a critical limit at a critical control point.
- In one establishment, the HACCP verification records did not document the results of ongoing verification.

Specific deficiencies are reported in the attached individual establishment checklists.

12.3 Testing for Generic *Escherichia coli*

FSIS has determined that the analysis of *Enterobacteriaceae* and Total Viable Count in lieu of testing for generic *E. coli* is acceptable for all EU exporting countries. However, Ireland continues to use generic *E. coli* testing for product exported to the United States.

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

Testing for generic *E. coli* was properly conducted in two slaughter establishments with the following exception:

- In one establishment, the carcass selection method for generic *E. coli* testing was not random.

Specific deficiencies are noted in the attached individual establishment reports.

12.4 Microbiological Testing of Ready-to-Eat Products

One of the three establishments audited was producing ready-to-eat products.
In accordance with FSIS requirements, the HACCP plan in this establishment had been reassessed to include *Listeria monocytogenes* as a hazard reasonably likely to occur.

12.5 EC Directive 64/433

In the applicable establishments, the provisions of EC Directive 64/433 were effectively implemented regarding slaughter/processing controls with the exception of the following deficiency:

- In one slaughter establishment, the sub-maxillary lymph nodes were not incised by the responsible official inspector during post-mortem inspection of the head.

13. 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.

Ireland's National Residue Control program for 2008 was being followed and was on schedule.

13.1 EC Directive 96/22

The provisions of EC Directive 96/22 were effectively implemented.

13.2 EC Directive 96/23

The provisions of EC Directive 96/23 were effectively implemented.

14. 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*.

14.1 Daily Inspection

Inspection was being conducted daily in the audited establishment and was well-documented.

14.2 Testing for *Salmonella* Species

Ireland has adopted the FSIS regulatory requirements for testing for *Salmonella* with the exception of the following equivalent measures:

- Private laboratories analyze the samples.
- Establishment employees collect the samples for *Salmonella*.
- ISO 6579:2002 method is used to detect *Salmonella*.

Two establishments were required to meet the basic FSIS regulatory requirements for *Salmonella* testing and were evaluated according to the criteria employed in the United States' domestic inspection program.

Testing for *Salmonella* was properly conducted in both slaughter establishments.

14.3 Species Verification

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

14.4 Periodic Supervisory Reviews

Periodic supervisory reviews of the certified establishments were being performed and documented as required.

14.5 Inspection System Controls

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

- In one slaughter establishment, the sub maxillary lymph nodes were not incised by the responsible official inspector during post-mortem inspection of the head.

In addition, controls were in place for the importation of only eligible livestock from other countries, i.e., only from eligible third countries and certified establishments within those countries, and the importation of only eligible meat products from other countries 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.

15. CLOSING MEETING

A closing meeting was held on May 29, 2008, in Dublin with the CCA. At this meeting, the primary findings and conclusions from the audit were presented by the auditor.

The CCA understood and accepted the findings.

Nader Memarian, DVM
Senior Program Auditor

16. ATTACHMENTS TO THE AUDIT REPORT

Individual Foreign Establishment Audit Form
Foreign Country Response to Draft Final Audit Report (when it becomes available)

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
Rib World Carrigeen Industrial Estate Clonmel	05/21/ 2008	799	Ireland
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Nader Memarian, 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 SSOPs have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	X
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.	X
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.	X
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	X
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	
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	
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: 05/21/2008 Est. # 799 (Rib World [P]) (Clonmel, Ireland)

13/51/56A) Documentation of corrective actions taken in response to deficiencies identified during pre-operational and operational sanitation did not include all three parts of the corrective actions. [Regulatory references: 9CFR 416.15(b), 9CFR 416.16(a), and 9CFR 416.17]
B) One establishment employee was observed handling edible products without washing or sanitizing her hands after touching non food contact surfaces in the processing room. [9 CFR 416.4 and Council Directive 64/433/EEC of June 26, 1964. Annex1 Chapter III (7)(d)]

15/51 The establishment's written HACCP plan did not contain a description of the verification procedures (calibration of process-monitoring instruments and direct observation of monitoring activities) and the frequency with which those procedures were to be performed. [9CFR 417.2(c)(7), 417.4(a)(2), and 417.8]

22/51 A) Verification records for CCP1 did not document the type of the verification procedures performed and the results of the verification. [9CFR 417.5(a)(3) and 9CFR 417.8]

B) Verification records for calibration of process-monitoring instruments did not document the times when the specific events occurred. [9CFR 417.5(b) and 9CFR 417.8]

25 There were three holding containers full of products and without proper identification in the blast freezer. [9 CFR part 317]

The auditor was assured by the inspection officials and/or establishment personnel that all deficiencies found in this audit would be scheduled for correction.

61. NAME OF AUDITOR
Nader Memarian. DVM

62. AUDITOR SIGNATURE AND DATE

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
Queally Pig Slaughtering Limited Dawn Pork and Bacon Waterford	05/20/2008	332	Ireland
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Nader Memarian, 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.	X
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 .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	X
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.	X
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	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	
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.	
59.	

60. Observation of the Establishment

Date: 05/20/2008 Est. # 332 (Queally Pig Slaughtering Limited [S/P]) (Waterford, Ireland)

10/56 A) Meat product residues and unidentified black color particles from the previous day's production were observed on three plastic interlock conveyors in the cutting room. The conveyors were ready for use for the day's production of food products. [Regulatory references: 9CFR 416.13, 9CFR 416.17, and Council Directive 64/433/EEC, Annex I, Chapter II (n)]

B) Several white color plastic tubs used to transport meat products were identified with product residues from the previous day's production. [9CFR 416.13, 9CFR 416.17, and Council Directive 64/433/EEC, Annex I, Chapter II (n)]

15/51 The establishment's written HACCP plan did not contain a description of the verification procedures (direct observations of monitoring activities and the review of records) and the frequency with which those procedures were to be performed. [9CFR 417.2 (c)(7), 9CFR 417.4 (a)(2), and 9CFR 417.8]

22/51 Verification records for calibration of process-monitoring instruments did not document the times when the specific events occurred. [9CFR 417.5(b) and 9CFR 417.8]

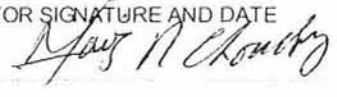
39/51 Maintenance of overhead structures, above exposed product and equipment, had been neglected with build up of rust on the carcass cooler's rails and numerous holes in the cutting room ceiling. [9CFR part 416.2 and 9CFR 416.17]

The auditor was assured by the inspection officials and/or establishment personnel that all deficiencies found in this audit would be scheduled for correction.

61. NAME OF AUDITOR

Nader Memarian, DVM

62. AUDITOR SIGNATURE AND DATE



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
Rosderra Irish Meats Group Ltd Roscera	05/27/2008	355	Ireland
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Nader Memarian, 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.	X
11. Maintenance and evaluation of the effectiveness of SSOP's.	X
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.	X
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.	X
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	X
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	
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	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	X
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	X
57. Monthly Review	
58. NOID	X
59.	

10/56 Meat product residues from the previous day's production were observed on two plastic interlock conveyors in the cutting room. The conveyors were ready for use for the day's production of food products. [Regulatory references: 9CFR 416.13, 9CFR 416.17, and Council Directive 64/433/EEC, Annex I, Chapter II (n)]

11/51 Neck and jowls of the contaminated hog carcasses (on the detain line) were contacting employees' work platform in the slaughter room. [9 CFR part 416.14 and 416.17]

15/51 A) The establishment's HACCP plan did not address the frequency of the verification procedures. [9 CFR part 417.4(a)(2), 9 CFR part 417.2 (c) 7, and 417.8]
B) The establishment's HACCP plan did not include all four parts of corrective actions in response to any deviation from a critical limit at a critical control point. [9 CFR part 417.3, 9 CFR part 417.2 (c)5, and 417.8]

22/51 A) The HACCP verification records did not document the results of ongoing verification. [9 CFR part 417.5(a)(3) and 417.8]
B) The HACCP verification records for calibration of process-monitoring instruments did not document the quantifiable values or the times when the specific events occurred. [9CFR 417.5 (a) 3, 417.5 (b), and 417.8]

27/51 The carcass selection method for generic *E. coli* testing was not random. [9 CFR 310.25 (a) 2 (i)]

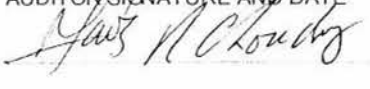
55/56/51 The submaxillary lymph nodes were not incised/examined by the responsible official inspector. The veterinarian in charge took immediate corrective actions. No product will export to the U.S. from today's production. [Council Directive 64/433/EEC of June 26, 1964, Annex 1, Chapter VI 25(b)]

58 The Irish Department of Agriculture, fishery and Food issued to the establishment a Notice of Intent to Delist (NOID) for failure to implement their SSOP and HACCP plan.

61. NAME OF AUDITOR

Nader Memarian. DVM

62. AUDITOR SIGNATURE AND DATE



Department of
Agriculture,
Fisheries and Food
An Roinn
Talmhaíochta,
Iascaigh agus Bia

Dr. Donald Smart
Director
International Audit Staff
Office of International Affairs
United States Department of Agriculture
Food Safety and Inspection Service
Washington D.C.

2nd March 2009

Dear Dr. Smart,

Thank you for your letter dated 30th December 2008 and the draft final report of the on-site audit of the Republic of Ireland's meat inspection system conducted 13th to 19th May 2008.

I would like to take this opportunity to compliment and thank you, Dr. Nader Memarian and your colleagues for the thorough and professional manner in which the audit was conducted.

We have no comments to make regarding the information in the report, which fairly reflects the findings noted during the audit.

I wish to assure you that all deficiencies found during the establishment audits have been addressed to the satisfaction of our Veterinary Public Health Inspection Service officials.

We are looking forward to the further audit of our inspection system which is planned for this year.

Yours sincerely,

_____
Martin O'Sullivan

Deputy Chief Veterinary Officer

Martin O'Sullivan MVB, BSc, MSc, MRCVS
Deputy Chief Veterinary Officer
Department of Agriculture and Food
Agriculture House, Kildare Street, Dublin 2, Ireland

Tel. 00 353 1 6072213 Fax.00 353 1 6610230 Email: martin.osullivan@agriculture.gov.ie