AUG 2 8 2005

Dr. Moshe Chaimovitz Director, Veterinary Services and Animal Health Ministry of Agriculture and Rural Development Post Office Box 12 Bet Dagan Israel 50250

Dear Dr. Chaimovitz:

The Food Safety and Inspection Service (FSIS) conducted an on-site audit of Israel's poultry inspection system May 11 to June 4, 2008. Enclosed is a copy of the final audit report.

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

Sincerely,

Donald Smart

Director

International Audit Staff

Office of International Affairs

Cto Min-for

Enclosure

# FINAL REPORT OF AN AUDIT CARRIED OUT IN ISRAEL COVERING ISRAEL'S POULTRY INSPECTION SYSTEM

MAY 11 through JUNE 4, 2008

Food Safety and Inspection Service U.S. Department of Agriculture

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#### ABBREVIATIONS AND SPECIAL TERMS USED IN THE REPORT

APHIS Animal and Plant Health Inspection Service

CCA Central Competent Authority (Veterinary Services and

Animal Health)

CV Chief Veterinarian, Control of Animal Products

E. coli Escherichia coli

END Exotic Newcastle Disease

FAPAS Food Analysis Performance Assessment Scheme

FSIS Food Safety and Inspection Service

HH Humane Handling

HPAI Highly-Pathogenic Avian Influenza

NOID Notice of Intent to Delist

PR/HACCP Pathogen Reduction/Hazard Analysis and Critical Control Point

Systems

RVO Regional Veterinary Officer

Salmonella Species

SPS Sanitation Performance Standards

SSOP Sanitation Standard Operating Procedure(s)

VIC Veterinarian in Charge

VSAH Veterinary Services and Animal Health

#### 1. SUMMARY

#### 1.1 Description/Eligibility

This report summarizes the outcome of the audit conducted in Israel from May 11 through June 4, 2008. This was a routine audit. Israel is eligible to export cooked poultry meat and cooked poultry meat products to the United States (U.S). At the time of the audit, eight establishments were eligible to export to the U.S. Between January 1, 2007 and March 31, 2008, Israel exported 2,916,530 pounds of poultry products to the U.S.; there were no rejections for any food safety concerns. Activities of the current audit appear in the table below.

The findings of the previous audit during October and November 2006 resulted in no restrictions of any Israeli establishment's ability to export poultry products to the U.S.

#### 1.2 Comparison of the Current Audit and the Previous Audit

	05/11-06/04, 2008	10/29-11/12, 2006
Levels of Government Oversight Audited		
Headquarters	1	1
Regional	1	2
Establishment Level	8	7
Laboratories Audited		
Microbiology	2	1
Residue	1	0
Establishments Audited		
Slaughter/Processing	3	2
Processing	5	5
Enforcement Actions Initiated		
NOID	0	0
Delistment	0	0
Risk Area Findings		
Sanitation Controls (SSOP, SPS)	1	4
Animal Disease Controls	0	0
Slaughter/Processing (PR/HACCP)	0	3
Residue Controls	0	0
Microbiology Controls	1	0
Inspection/Enforcement Controls	2	5
Special Emphasis (HH, O157:H7)	0	0

#### 1.3 Summary Comments for the Current Audit

The results of this audit reflected considerable continued improvement in inspection system controls. The only deficiencies noted were maintenance issues in one establishment and lack of government oversight in the private microbiology laboratory,

with two repeat findings from the last Food Safety and Inspection Service (FSIS) audit of this laboratory in December 2005.

#### 2. INTRODUCTION

An opening meeting was held on May 11 in Tel Aviv with the Central Competent Authority (CCA), Veterinary Services and Animal Health (VSAH). In this meeting, the auditor confirmed the objectives and scope of the audit, the auditor's itinerary, and requested additional information needed to complete the audit of Israel's meat inspection system.

The auditor was accompanied during the entire audit by representatives from the CCA and/or representatives from the regional and local inspection offices.

#### 3. OBJECTIVES OF THE AUDIT

The objectives of the audit were 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 U.S. and to evaluate the adequacy of humane handling (HH) policies and practices for live poultry presented for slaughter.

#### 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 Israel's inspection headquarters and in one regional office. The third part involved on-site visits to eight establishments: three slaughter establishments and five processing establishments. The fourth part involved visits to one private laboratory and two sections of the government-owned and

-operated laboratory. The Bactochem laboratory was conducting analyses of field samples for the presence of generic *Escherichia coli* (*E. coli*). The Kimron Veterinary Institute was conducting analyses of field samples for Israel's national residue control program and for the presence of *Salmonella* species (*Salmonella*).

Program effectiveness determinations of Israel's inspection system focused on five areas of risk: (1) sanitation controls, including the implementation and operation of Sanitation Standard Operating Procedures (SSOP); (2) animal disease controls; (3) slaughter/processing controls, including the implementation and operation of Hazard Analysis and Critical Control Point (HACCP) programs and the testing program for generic *E. coli*; (4) residue controls; and (5) enforcement controls, including the testing programs for *Salmonella* and *E. coli* O157:H7. Israel'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 Israel and also determined if establishment and inspection system controls were in place to ensure the production of meat products that are safe, unadulterated and properly labeled.

During the opening meeting, the auditor explained to the CCA that foreign inspection systems are audited in accordance with two areas of focus. First, FSIS auditors inspect against FSIS requirements. These include: daily inspection in all certified establishments; humane handling (HH) and slaughter of animals; the handling and disposal of inedible and condemned materials; species verification; and FSIS requirements for HACCP, SSOP, and testing for *E. coli* and *Salmonella*.

Second, FSIS auditors assess against any equivalence determinations that have been made by FSIS for an exporting country under provisions of the Sanitary/Phytosanitary Agreement. No special equivalence determinations have been made for Israel (Israel has not submitted any alternative procedures to FSIS for equivalence determination.)

#### 5. LEGAL BASIS FOR THE AUDIT

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

- The Federal Meat Inspection Regulations (9 CFR Parts 301 to end), which include the Pathogen Reduction/ Hazard Analysis and Critical Control Point (HACCP) regulations;
- The Poultry Products Inspection Act (21 U.S.C. 451 et seq.); and
- The Poultry Products Inspection Regulations (9 CFR Part 381).

#### 6. SUMMARY OF PREVIOUS AUDITS

Final audit reports are available on the FSIS website at www.fsis.usda.gov/OPPDE/FAR/index.htm.

#### 6.1 October-November 2006

Seven of the eight certified establishments and one government microbiology laboratory were audited; there were no delistments or Notices of Intent to Delist (NOIDs). The following deficiencies were reported:

- Neglected maintenance of over-product structures in two establishments;
- · Numerous combo bins that were in need of repair in two establishments;
- · Illegible corrections in the monitoring documentation in two establishments; and
- Failure to document the times when the verifications were performed in one establishment.

#### 6.2 November-December 2005

Ten of the 18 certified establishments, one government residue laboratory, one government microbiology laboratory, and one private microbiology laboratory were audited; two establishments were delisted and five received NOIDs. The following deficiencies were reported:

- Failure to identify the corrective actions to be taken in response to deviations from critical limits in the written HACCP plans in all 10 establishments;
- Some SSOP requirements were not effectively implemented in all 10 establishments;
- Product residues from previous days' operations observed on food contact surfaces in six establishments;
- Plastic strip curtains on doors between production rooms contacting and crosscontaminating employees' boots, clean garments, aprons, clean containers, and racks for edible product in six establishments;
- Samples for Salmonella being analyzed in private laboratories;
- Samples for generic E. coli taken by VSAH inspectors and analyzed in the government laboratory;
- Failure by the government to provide testing results for *E. coli* to the six slaughter establishments unless a problem was identified;
- Condensate from overhead pipes and ceilings dripping onto exposed carcasses and product in two establishments;
- Carcasses contacting employees' boots, work platforms, and floors in two establishments; and
- A testing method for Salmonella that was neither the FSIS method nor an approved equivalent method being used in the microbiology laboratory.

#### 7. MAIN FINDINGS

#### 7.1 Government Oversight

#### 7.1.1 CCA Control Systems

The CCA is Veterinary Services and Animal Health (VSAH), which is a subdivision of the Ministry of Agriculture and Rural Development. There have been no changes in the organization or structure of VSAH since the last FSIS audit of Israel in October-November 2006.

There are three levels of inspection: VSAH headquarters; two VSAH regional veterinary offices; and in-plant inspection which consists of an in-plant Veterinarian in Charge (VIC) and inspection staff.

The headquarters office of VSAH is located in Beit Dagan. All activities that concern the export of poultry product to the U.S. are coordinated by the Chief Veterinarian, Control of Animal Products (CV). The CV is supported within the office by a HACCP Project Manager and another veterinarian who coordinates national training.

At the second level, Israel has been divided into two regions: Beit Dagan and Haifa. At the time of this audit, the Haifa office provides oversight over seven of the eight

establishments and the Beit Dagan office provides oversight over the other. The two Regional Veterinary Officers (RVOs) handle the oversight of the field veterinarians and inspection personnel, perform the required periodic internal reviews of the establishments, and ensure that the FSIS requirements forwarded to them by the Beit Dagan headquarters office are implemented appropriately.

The third level of inspection within VSAH consists of the in-plant personnel. Each establishment within Israel is headed by a VIC. Each VIC has been given the authority to perform oversight inspection by VSAH headquarters in Beit Dagan. The VIC oversees a staff of inspection personnel whose size varies according to the size and complexity of each establishment's operations.

#### 7.1.2 Ultimate Control and Supervision

The VSAH maintains ultimate control and supervision over the establishments certified by VSAH as eligible to export to the U.S. New requirements are received in VSAH headquarters and are reviewed and signed by the CV. They are placed on the VSAH website and are also sent by e-mail to the Area Supervisors, who are responsible for tracking their implementation and enforcement in the establishments by the VICs during the Area Supervisors' periodic (monthly) internal supervisory reviews. Each RVO must provide a monthly report to the CV covering his/her supervisory procedures regarding the activities of the establishments and the performance of the in-plant inspection personnel. The CV reviews these reports and evaluates the performance of the Area Supervisors. The VICs also provide monthly reports to the RVOs documenting the work performed in the establishments by themselves and by the inspectors who report to their offices. At least once per year, all Area Supervisors and VICs are brought to VSAH headquarters for special instruction regarding all FSIS requirements.

Blank health certificates are provided directly to the VICs in slaughter establishments by the central office in Beit Dagan. In processing establishments, the health certificates for export to the U.S. are generated by the VICs with a government computer program. The RVOs verify the completeness and correctness of the health certificates during their internal reviews.

All eight certified establishments' HACCP systems are reviewed every six months by the HACCP Project Manager whose findings are brought before a special certification committee in the office of the CV; the committee discusses the findings and, in case of recurrent problems, decides on a course of action.

### 7.1.3 Assignment of Competent, Qualified Inspectors

Each CCA veterinarian must have a university degree in Veterinary Science or Veterinary Medicine and must be licensed by the CV to be considered qualified to apply for the VSAH inspection service. Each non-veterinary inspector must have at least a high school diploma. All newly-hired inspection personnel receive six weeks of on-the-job training. No inspection personnel are permitted to have any outside employment. All veterinarians working in poultry inspection receive two days of training each year in

SSOP, PR/ HACCP systems and testing programs for E. coli, Salmonella, and Listeria monocytogenes at VSAH headquarters.

The system of payment for inspection personnel has not changed since Israel first achieved eligibility to export to the U.S. some 35 years ago. All RVOs, VICs, and line inspectors in the slaughter facilities are full-time employees of the Israeli Poultry Board which is co-owned by the government and the poultry farmers and whose chairman is an official nominated by the government. The Poultry Board collects fees from the establishments for the services of the inspection personnel. In the further-processing facilities, the non-veterinary inspection personnel are employed by the local municipal government councils and are paid from fees collected by these government agencies from the establishments for inspection services rendered. No inspection personnel receive any direct remuneration of any kind from the establishments, nor are they permitted to engage in any outside employment.

In case of illness or other absence on the part of inspection personnel in establishments certified for U.S. export, relief is provided from a pool of qualified officials. In the Haifa region, there are two reserve veterinarians and three inspectors for relief in slaughter establishments and there are one reserve veterinarian and one inspector for relief in processing establishments. In the Beit Dagan region, the relief pool consists of one reserve veterinarian and three inspectors.

#### 7.1.4 Authority and Responsibility to Enforce the Laws

VSAH has the authority and responsibility to enforce the applicable laws relevant to U.S.- certified establishments. VSAH has the authority to approve establishments for export to the U.S. and has the responsibility for withdrawing such approval when establishments do not have adequate and/or effective controls in place to prevent, detect, and eliminate product contamination or adulteration. The RVOs are in charge of verifying and evaluating the implementation of the official guidelines and instructions.

#### 7.1.5 Adequate Administrative and Technical Support

VSAH has the administrative and technical support to effectively implement and enforce FSIS requirements throughout Israel's poultry inspection system. Oversight of the private laboratories performing the testing for *E. coli* has been, as of the time of this audit, provided by the National Agency for Laboratories and the Department of Health, both of which provide certification. Oversight of the government-owned and -operated residue and microbiology laboratories is performed by the Israel Laboratory Accreditation Authority, an autonomous member of the Ministry of Industry and Trade. The CV provides a table to the laboratory management which contains all FSIS-approved methodologies and the SOPs ensure that they are used for U.S.-eligible products.

A central steering committee, which includes members of the VSAH, members of Industry Extension, officers of the Ministry of Agriculture and the Ministry of Health, and Plant Protection officials, decides annually which compounds will be included in the residue program. The sampling program is designed proportionally to the production by each slaughter establishment. Samples are not requested for specific testing. All samples

have an equal chance of being analyzed for any residue; a random selection is performed on all samples upon their arrival at the residue laboratory.

#### 7.2 Headquarters Audit

The auditor conducted a review of inspection system documents at the headquarters of the inspection service in Tel Aviv. 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;
- Label approval records;
- New laws and implementation documents such as: regulations; notices; directives and guidelines;
- Sampling and laboratory analyses for residues;
- Sanitation, slaughter and processing inspection procedures and standards; and
- Enforcement records, including examples of: recalls; seizure and control of noncompliant product; and suspending an establishment's ability to export product to the U.S.

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

#### 7.3. Audits of Regional and Local Inspection Sites

The auditor conducted interviews in the head offices of the inspection services in the Regional Office in Haifa and also interviewed the in-plant inspection personnel in the inspection offices in the eight establishments.

#### 8. ESTABLISHMENT AUDITS

The FSIS auditor visited a total of eight establishments: three slaughter/processing establishments and five processing establishments. There were no delistments or NOIDs.

#### 9. RESIDUE AND MICROBIOLOGY LABORATORY AUDITS

During laboratory audits, emphasis is placed on the application of procedures and standards that are equivalent to U.S. requirements.

Residue laboratory audits focus on: sample handling; sampling frequency; timely analysis; data reporting; analytical methodologies; tissue matrices; equipment operation and printouts; detection levels; recovery frequency; percent recoveries; intra-laboratory check samples; and quality assurance programs including standards books and corrective actions.

Microbiology laboratory audits focus on: analyst qualifications; sample receipt; timely analysis; analytical methodologies; analytical controls; recording and reporting of results;

and check sample programs. If private laboratories are used to test U.S. samples, the auditor evaluates compliance with the criteria established for the use of private laboratories under the FSIS PR/HACCP requirements.

The following laboratories were audited:

- The government-owned and -operated residue laboratory in the Kimron Veterinary Institute in Beit Dagan;
- The government-owned and -operated microbiology laboratory in the Kimron Veterinary Institute in Beit Dagan; and
- · The private Bactochem laboratory in Ness Ziona.

No concerns arose as a result of the audits of either of the laboratories in the Kimron Veterinary Institute.

However, in the private Bactochem laboratory, in which samples of U.S.-eligible products from one of the certified establishments are analyzed for *E. coli*, the following deficiencies were reported:

- There was no intra-laboratory check-sample program for E. coli. This deficiency was also identified in this laboratory when it was last audited by FSIS on December 15, 2005. The auditor did note, however, that on at least two occasions within the past year, this laboratory had participated in inter-laboratory (with the other private Israeli laboratory in Haifa where samples from the other seven U.S.-eligible establishments are analyzed) and international Food Analysis Performance Assessment Scheme (FAPAS) check sample programs; and
- No internal review had been conducted since March 2007. According to the
  written quality assurance program, internal reviews are to be conducted monthly.
  This deficiency was also identified in this laboratory when it was last audited by
  FSIS on December 15, 2005.

#### 10. SANITATION CONTROLS

As stated earlier, FSIS focuses on five areas of risk to assess an exporting country's 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, Israel'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, Israel'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.

#### 10.1 SSOP

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOP were met according to the criteria employed in the U.S. domestic inspection program. The SSOPs in all of the eight establishments were found to meet the basic FSIS regulatory requirements with no deficiencies reported.

#### 10.2 Sanitation Performance Standards (SPS)

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for Sanitation Performance Standards (SPS) were met according to the criteria employed in the U.S. domestic inspection program. The SPS in the eight establishments were found to meet the basic FSIS regulatory requirements with the following deficiency:

 In one establishment, loose ceiling panels and over-product structures with varying degrees of rust and flaking paint were observed over exposed product areas in several production rooms.

#### 11. ANIMAL DISEASE CONTROLS

The second of the five risk areas that the FSIS auditors review is 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 Israel's inspection system had adequate controls in place. No deficiencies were noted.

The U.S. Animal and Plant Health Inspection Service (APHIS) has placed restrictions on poultry products from Israel. Because of the presence of both Exotic Newcastle Disease (END) and Highly-Pathogenic Avian Influenza (HPAI) H5N1 viruses in Israel, poultry for export to the U.S. must be heated to a minimum temperature of 74° C. and the importer is required to have a veterinary import permit.

#### 12. SLAUGHTER/PROCESSING CONTROLS

The third of the five risk areas that FSIS auditors review is Slaughter/Processing Controls. These include: humane handling and slaughter; ingredients identification; control of restricted ingredients; formulations; processing schedules; equipment and records; and processing controls for cured, dried, and cooked products.

The controls also include the implementation of HACCP systems in all establishments and implementation of testing programs for generic *E. coli* in slaughter establishments.

#### 12.1 Humane Handling and Slaughter

No deficiencies were noted.

#### 12.2 HACCP Implementation

All establishments approved to export meat products to the U.S. are required to have developed and adequately-implemented HACCP programs. Each of these programs was evaluated according to the criteria employed in the U.S. domestic inspection program. All of the eight establishments audited had adequately implemented the PR/HACCP requirements.

#### 12.3 Testing for Generic E. coli

Israel has adopted the FSIS regulatory requirements for testing for E. coli.

Three of the eight certified establishments were required to meet the basic FSIS regulatory requirements for testing for *E. coli* and were evaluated according to the criteria employed in the U.S. domestic inspection program.

Testing for E. coli was conducted properly in all of the three slaughter establishments.

#### 12.4 Testing for Listeria monocytogenes

Five of the eight establishments audited were required to meet the basic FSIS regulatory requirements for testing for *Listeria monocytogenes* and were evaluated according to the criteria employed in the U.S. domestic inspection program.

Testing for *Listeria monocytogenes* was conducted properly in all of the five establishments in which it was required.

#### 13. RESIDUE CONTROLS

The fourth of the five risk areas that FSIS auditors review is Residue Controls. These 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 residue laboratory in the Kimron Veterinary Institute in Beit Dagan was audited. No deficiencies were reported.

Israel's National Residue Testing Plan for 2008 was being followed and was on schedule.

#### 14. ENFORCEMENT CONTROLS

The fifth of the five risk areas that the FSIS auditors review is Enforcement Controls. These include: the enforcement of inspection requirements and the testing programs for *Salmonella, Listeria monocytogenes*, and *E. coli* O157:H7 in establishments that produce certain beef products.

#### 14.1 Daily Inspection in Establishments

Inspection was being conducted daily in all slaughter and processing establishments whenever U.S.-eligible products were being produced.

#### 14.2 Testing for Salmonella Species

Israel has adopted the FSIS regulatory requirements for testing for Salmonella.

Three of the eight establishments audited were required to meet the basic FSIS regulatory requirements for *Salmonella* testing and were evaluated according to the criteria employed in the U.S. domestic inspection program. Testing for *Salmonella* was conducted properly in all of the establishments in which it was required.

#### 14.3 Testing for E. coli O157:H7

None of the eight establishments was required to meet the basic FSIS regulatory requirements for testing for *E. coli* O157:H7.

#### 14.4 Species Verification

At the time of this audit, Israel was required to conduct species verification on certain products eligible for export to the U.S. Species verification was being conducted properly in the five establishments in which it was required. Two samples are taken by the VIC monthly in each of the five further-processing establishments and sent to the laboratory in the Kimron Veterinary Institute for testing.

#### 14.5 Periodic Reviews

Periodic supervisory reviews of certified establishments were being performed and documented as required. The RVOs conduct routine internal reviews on a monthly basis. The focus of their reviews is twofold. First, establishment compliance with requirements is evaluated. These requirements include: HACCP programs; SSOP and SPS; E. coli, Salmonella, and Listeria testing programs; labeling and marking; live-poultry receiving; general and personal hygiene; preventive maintenance; and pest control. Second, fulfillment of all responsibilities by the in-plant inspection personnel is evaluated. These responsibilities include: reviews of health certificates that accompany the live poultry; performance of ante- and post-mortem inspection; control of chemical residues; monitoring of problem farms; verification of HACCP and SSOP programs; verification of Salmonella, E. coli, and Listeria testing programs; control over labels; compliance

with official directives; initial and continuing education of line inspectors; and implementation of any special headquarters instructions.

#### 14.6 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 U.S. with product intended for the domestic market. No poultry or poultry meat is imported from other countries for use in U.S.-eligible products.

Furthermore, and except as noted below, adequate controls were found to be in place for oversight over private laboratories used for: analysis of U.S.-eligible products; security items; shipment security; and products entering the establishments from outside sources.

The following deficiencies should have been identified by VSAH in advance of this audit:

- In one establishment, maintenance of over-product structures had been neglected;
   and
- In the private Bactochem laboratory, in which samples of U.S.-eligible products from one of the certified establishments are analyzed, there was no intralaboratory check-sample program for generic E. coli and no internal review had been conducted since March 2007. Both of these deficiencies had been reported in this laboratory when it was last audited by FSIS on December 15, 2005 and had not been addressed and corrected. It was noted that, up to the time of this audit, VSAH had been relying on the National Agency for Laboratories and the Department of Health, both of which were providing certification to this private laboratory, for oversight regarding enforcement of FSIS requirements and corrective actions.

#### 15. CLOSING MEETING

A closing meeting was held on June 4 in Tel Aviv with the CCA. At this meeting, the primary findings, conclusions, and recommendations from the audit were presented by the auditor.

Gary D. Bolstad, DVM Senior Program Auditor for Manzoon H. Chundry

## 16. ATTACHMENT TO THE AUDIT REPORT

Israel's comments on the Draft Final Audit Report (when they become available)

#### United States Department of Agriculture Food Safety and Inspection Service

1. E	STABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. E	STABLISHMENT NO.	4. NAME OF COUNTRY	
S	oglowek Ltd. 2000	May 28, 2008	21	9	Israel	
	hlomi	5. NAME OF AUDIT	OF AUDITOR(S)		6. TYPE OF AUDIT	
9.		Gary D. Bolsta				MENT AUDIT
Pla	ce an X in the Audit Results block to inc	dicate noncomp	liand	e with requireme	ents. Use O if not applicable	e.
Part	A - Sanitation Standard Operating Procedures ( Basic Requirements	SSOP) Audit Results			art D - Continued onomic Sampling	Audit Results
7. \	Written SSOP	3	33.	Scheduled Sample		
8. F	Records documenting implementation.	*	34.	Species Testing		
9. \$	Signed and dated SSOP, by on-site or overall authority.		35.	Residue		()
Sa	initation Standard Operating Procedures (SSOP) Ongoing Requirements			Part E	- Other Requirements	
10.	Implementation of SSOP's, including monitoring of implem	entation.	36.	Export		6
11.	Maintenance and evaluation of the effectiveness of SSOP's		37.	Import		e.
12.	Corrective action when the SSOPs have falled to prevent d product contamination or adulteration.	irect -	38.	Establishment Grounds	and Pest Control	ē
13.	Daily records document item 10, 11 and 12 above.	- W	39.	Establishment Constru	ction/Maintenance	
	Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements			Light		
14.	Developed and implemented a written HACCP plan .		7"	Ventilation		1
15.	Contents of the HACCP list the food safety hazards, critical points, critical limits, procedures, corrective actions.	al control		Plumbing and Sewage		4.5
16.	Records documenting implementation and monitoring of the HACCP plan.			Water Supply  Dressing Rooms/Lavat	ories	63
17.	The HACCP plan is signed and dated by the responsible establishment individual.		10000	Equipment and Utensile		
	Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	197	46.	Sanitary Operations		2
18.	Monitoring of HACCP plan.		47.	Employee Hygiene		
19.	Verification and validation of HACCP plan.			Condemned Product C	ontrol	
20.	Corrective action written in HACCP plan.	740	1	Dort F. I	assection Dequirements	170
27.570	Reassessed adequacy of the HACCP plan.	*	1	rait r - i	nspection Requirements	
22.	Records documenting: the written HACCP plan, monitorin critical control points, dates and times of specific event or	g of the currences.	49.	Government Staffing		
	Part C - Economic / Wholesomeness	Tan.	50.	Daily Inspection Covera	age	F.
23.	Labeling - Product Standards	**	51.	Enforcement		
	Labeling - Net Weights	4	52	Humane Handling		
	General Labeling	29 2		75		
26.	Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Mo	oisture)	53.	Animal Identification		0
	Part D - Sampling Generic E. coli Testing		54.	Ante Mortem Inspection	,	O
27.	Written Procedures	0	55.	Post Mortem Inspection	1	0
28.	Sample Collection/Analysis	. 0				
29.	Records	0		Part G - Other Regi	ulatory Oversight Requirements	
S	almonella Performance Standards - Basic Requ	irements	56.	European Community D	irectives	О
30.	Corrective Actions	0	57.	Monthly Review		12
31.	Ressessment	O	58.	Listeria monocyto	genes & Salmonella (RTE)	ii N
32.	Written Assurance	0	59.			

Est. 219, Soglowek Ltd. 2000, Shlomi, Israel; May 28, 2008; poultry pastrami, frozen chicken meat for kabobs, and (not for U.S. export) processing of beef into pastrami and steaks

There were no significant findings to report after consideration of the nature, extent, and degree of all observations.

61. NAME OF AUDITOR Gary D. Bolstad, DVM of Man 2001 H. Chaudy 8/4/08

## United States Department of Agriculture Food Safety and Inspection Service

1. E	STABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. E	STABLISHMENT NO.	4. NAME OF COUNTRY	
N	laof, Ltd.	May 18, 2008	C	03	Israel	
В	Beer Tuvia	5. NAME OF AUDITO	OR(S)		6. TYPE OF AUDIT	
		Dr. Garv D	Dr. Garv D. Bolstad		X ON-SITE AUDIT DOCUM	ENT AUDIT
Plac	ce an X in the Audit Results block to ind	icate noncomp	liand	e with requirem	ents. Use O if not applicable	e.
Part	A - Sanitation Standard Operating Procedures (S Basic Requirements	SSOP) Audit Results		100	rt D - Continued pnomic Sampling	Audit Results
7. V	Vritten SSOP	*	33.	Scheduled Sample		
8. R	Records documenting implementation.		34.	Species Testing		
9. S	signed and dated SSOP, by on-site or overall authority.	P.	35.	Residue		15
Sai	nitation Standard Operating Procedures (SSOP) Ongoing Requirements			Part E -	Other Requirements	
10. 1	Implementation of SSOP's, including monitoring of implemen	tation.	36.	Export		
11.	Maintenance and evaluation of the effectiveness of SSOP's.	*	37.	Import		. 0
	Corrective action when the SSOPs have falled to prevent dir- product contamination or aduteration.	ect	38.	Establishment Grounds	and Pest Control	20
13. 1	Daily records document item 10, 11 and 12 above.		39.	Establishment Construc	tion/Maintenance	X
	Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements		1000	Light		
	Developed and implemented a written HACCP plan .		41.	Ventilation		
	Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective act	ions.		Plumbing and Sewage		÷
	Records documenting implementation and monitoring of the HACCP plan.	1		Water Supply  Dressing Rooms/Lavato	an'n	•
	The HACCP plan is signed and dated by the responsible establishment individual.			Equipment and Utensils		•
	Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	Ha	46.	Sanitary Operations		
18. 1	Monitoring of HACCP plan.		47.	Employee Hygiene		
	Verification and validation of HACCP plan.	- 2	48.	Condemned Product Co	ntrol	
	Corrective action written in HACCP plan.		1	Part F - In	spection Requirements	
22. 1	Reassessed adequacy of the HACCP plan.  Records documenting: the written HACCP plan, monitoring of critical control points, dates and times of specific event occur.	f the	49.	Government Staffing		
	Part C - Economic / Wholesomeness		50.	Daily Inspection Coverage	ge	*
23. L	_abeling - Product Standards			54 100 4-4009		240
	_abeling - Net Weights	¥-	51.	Enforcement		X
	General Labeling	D8	52.	Humane Handling		
	Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Mois	sture)	53.	Animal Identification		
1557V	Part D - Sampling Generic E. coli Testing		54.	Ante Mortem Inspection		·
27. V	Written Procedures		55.	Post Mortem Inspection		
28. 5	Sample Collection/Analysis		1			
29. F	Records	35 80	1	Part G - Other Regu	latory Oversight Requirements	
	almonella Performance Standards - Basic Requir	ements	56.	European Community Dir	rectives	O
30. 0	Corrective Actions	2	57.	Monthly Review		
31. F	Reassessment		58.			
	Written Assurance		59.			or .

Est. 003, Maof Ltd., Beer Tuvia, Israel; May 18, 2008. Operations: Turkey slaughter & cut-up

39/51 Loose ceiling panels and overhead structures with varying degrees of rust and flaking paint were observed over exposed product areas in several production rooms. The VSAH officials ordered prompt correction; however, these should have been identified by VSAH in advance. [Regulatory references: 9CFR §416.2(b) and 416.17]

61. NAME OF AUDITOR Gary D. Bolstad, DVM of Menzoor H. Chaudry, 8/4/08

#### United States Department of Agriculture Food Safety and Inspection Service

1.	ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. E	STABLISHMENT NO.	4. NAME OF COUNTRY	
(	Of-Tov (Shean) / Hodu Tov (Shean) Ltd.	May 19, 2008	00	08	Israel	
	Beit-Shean	5. NAME OF AU	TOR(S	2	6. TYPE OF AUDIT	
		Gary D. Bol	stad D	VM	X ON-SITE AUDIT   DOCU	MENT MIDIT
	. The second of the second of					MENT AUDIT
	ace an X in the Audit Results block to i		pliand			le.
Par	t A - Sanitation Standard Operating Procedure	s (SSOP) Aux Res		1,1617	art D - Continued onomic Sampling	Audit Results
7	Basic Requirements Written SSOP			Scheduled Sample	onomic Sampling	4
	Records documenting implementation.		200			**
		*		Species Testing		
	Signed and dated SSOP, by on-site or overall authority. anitation Standard Operating Procedures (SSO	(P)	35	Residue		
	Ongoing Requirements			Part E	- Other Requirements	
10.	Implementation of SSOP's, including monitoring of imple	ementation.	36	Export		
	Maintenance and evaluation of the effectiveness of SSO	*	37	Import		0
12.	Corrective action when the SSOPs have failed to preven product contamination or adulteration.	t direct	38	Establishment Grounds	and Pest Control	14
, 13.	Daily records document item 10, 11 and 12 above.		39	Establishment Construc	ction/Maintenance	
	Part B - Hazard Analysis and Critical Control		40	Light		
	Point (HACCP) Systems - Basic Requirements		41.	Ventilation		
	Developed and implemented a written HACCP plan .  Contents of the HACCP list the food safety hazards, cri	tical control	42	Plumbing and Sewage		
	points, critical limits, procedures, corrective actions.  Records documenting implementation and monitoring of	*		Water Supply		
10,	HACCP plan.		44	Dressing Rooms/Lavate	pries	3
17.	The HACCP plan is signed and dated by the responsible establishment individual.	e		Equipment and Utensils		
	Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		46.	Sanitary Operations		
18.	Monitoring of HACCP plan.	1/2	47.	Employee Hygiene	*	
19.	Verification and validation of HACCP plan.	2	48.	Condemned Product Co	ontrol	25
20.	Corrective action written in HACCP plan.	(6.)			Commence of the Commence of th	
21.	Reassessed adequacy of the HACCP plan.	(25)	- 1	Part F - I	nspection Requirements	
22.	Records documenting: the written HACCP plan, monito critical control points, dates and times of specific event		49.	Government Staffing		
	Part C - Economic / Wholesomeness		50.	Daily Inspection Covera	age	
23.	Labeling - Product Standards		51	Enforcement		
24.	Labeling - Net Weights	(10)	-			125
25.	General Labeling		52.	Humane Handling		
26.	Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/	Moisture)	53.	Animal Identification		
	Part D - Sampling Generic E. coli Testing		54.	Ante Mortem hspection	1	
27.	Written Procedures		55.	Post Mortem Inspection	1	
28.	Sample Collection/Analysis	2.00	2.50			
	Records			Part G - Other Regu	ulatory Oversight Requirements	
5	Salmonella Performance Standards - Basic Rec	quirements	56.	European Community D	irectives	0
			57.	Monthly Review		
30.	Corrective Actions	(*)		and no see see see see see see see see see se		
31.	Reassessment	7.00	58.			ĕ
32.	Written Assurance		59.			11

Israel Establishment 008,

05/19/2008

Chicken & turkey slaughter & processing

There were no significant findings to report after consideration of the nature, extent, and degree of all observations.

61. NAME OF AUDITOR
Dr. Faizur R. Choudry, DVM

62. AUDITOR SIGNATURE AND DATE Chaudry 8/4/08

#### United States Department of Agriculture Food Safety and Inspection Service

1,	ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. E	STABLISHMENT NO.	4. NAME OF COUNTRY	5	
S	Soglowek (Shelomi) Ltd.	June 1, 2008	019		Israel		
S	Shelomi	5. NAME OF AUDITO	OR(S)		6. TYPE OF AUDIT		
		Gary D. Bolsta		4	X ON-SITE AUDIT	-	NT AUDIT
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Par	t A - Sanitation Standard Operating Procedures (S Basic Requirements	SSOP) Audit Results			art D - Continued onomic Sampling		Audit Results
7.	Written SSOP	*	33.	Scheduled Sample			3.5
8.	Records documenting implementation.		34.	Species Testing			. 0
9.	Signed and dated SSOP, by on-site or overall authority.	#		Residue			4 157
S	anitation Standard Operating Procedures (SSOP) Ongoing Requirements			Part E	- Other Requirements		
10.	Implementation of SSOP's, including monitoring of implementation	entation.	36.	Export			94
11.	Maintenance and evaluation of the effectiveness of SSOP's.		37.	Import			. 0
12.	Corrective action when the SSOPs have falled to prevent dis product contamination or adulteration.	rect	38.	Establishment Grounds	and Pest Control		2
13.	Daily records document item 10, 11 and 12 above.		39.	Establishment Constru	ction/Maintenance		134
	Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements		1000	Light Ventilation			
14.	Developed and implemented a written HACCP plan .	2	1 *1.	Vermanon			
15.	Contents of the HACCP list the food safety hazards, critical points, critical limits, procedures, corrective actions.	l control		Plumbing and Sewage			
16.	Records documenting implementation and monitoring of the HACCP plan.		43.	Water Supply	1.0		1
17.	The HACCP plan is signed and dated by the responsible establishment individual.	*	1 2000	Dressing Rooms/Lavat Equipment and Utensil			38
	Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements			Sanitary Operations	**		<b>5</b>
18.	Monitoring of HACCP plan.	,	47.	Employee Hygiene			100
19.	Verification and validation of HACCP plan.	7:		Condemned Product C	ontrol	4	.*
20.	Corrective action written in HACCP plan.	1.60					
21.	Reassessed adequacy of the HACCP plan.	42		Part F - I	nspection Requiremen	nts	
22.	Records documenting: the written HACCP plan, monitoring critical control points, dates and times of specific event occ		49.	Government Staffing			
	Part C - Economic / Wholesomeness		50.	Daily Inspection Covera	age		
23.	Labeling - Product Standards		51.	Enforcement			*
24.	Labeling - Net Weights	14	52	Humane Handling			
	General Labeling	3.	52.	numarie nationing			
26.	Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moi	isture)	53.	Animal Identification			
	Part D - Sampling Generic E. coli Testing	1412	54.	Ante Mortem hspection	,		
27,	Written Procedures		55.	Post Mortem Inspection	1		
28.	Sample Collection/Analysis	•	1	D . O OU D	I-t Oi-bt Bass	vicemente	
29.	Records	14.1	1	Part G - Other Regi	ulatory Oversight Requ	urements	
S	almonella Performance Standards - Basic Requi	rements	56.	European Community D	irectives		0
30.	Corrective Actions		57.	Monthly Review			*
31.	Reassessment		58.	Equivalence de	termination Salmone	lla testing	10.
32.	Written Assurance		59.	Notice of Intent	to Delist		

Establishment # 019: Soglowek (Shelomi) Ltd., Shelomi, Israel; June 1, 2008; turkey & chicken slaughter, cutting, and boning

There were no significant findings to report after consideration of the nature, extent, and degree of all observations.

61. NAME OF AUDITOR
Gary D. Bolstad, DVM

62. AUDITOR SIGNATURE AND DATE Cheeredry 8/4/08

#### United States Department of Agriculture Food Safety and Inspection Service

ESTABLISHMENT NAME AND LOCATION     2. AUDIT		2. AUDIT DATE	3. ESTABLISHMENT NO. 4. NAME OF COUNTRY		4. NAME OF COUNTRY	
-	IV-TIRAT TZVI Meat Specialities	May 20, 2008	022		Israel	
1	M.P. Beit She'an Valley	5. NAME OF AUDIT	OR(S)		6. TYPE OF AUDIT	
		Gary D. Bolsta	Bolstad, DVM		X ON-SITE AUDIT DOCU	JMENT AUDIT
Pla	ace an X in the Audit Results block to ind	icate noncomp	liand	e with requireme	nts. Use O if not applicab	le.
Pa	t A - Sanitation Standard Operating Procedures (S Basic Requirements	SSOP) Audit Results		1000	rt D - Continued nomic Sampling	Audit Results
7.	Written SSOP	750	33.	Scheduled Sample		
8.	Records documenting implementation.	-31	34.	Species Testing		-
9.	Signed and dated SSOP, by on-site or overall authority.	24	35.	Residue		0
S	anitation Standard Operating Procedures (SSOP) Ongoing Requirements			Part E -	Other Requirements	Te.
10	Implementation of SSOP's, including monitoring of impleme	ntation.	36.	Export		
11.	Maintenance and evaluation of the effectiveness of SSOP's.	DI 55%	37.	Import		
12	Corrective action when the SSOPs have falled to prevent dir product contamination or adulteration.	ect	38.	Establishment Grounds	and Pest Control	
13.	Daily records document item 10, 11 and 12 above.		39.	Establishment Construc	tion/Maintenance	
	Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements		40.	Light		2
14	Developed and implemented a written HACCP plan .		. 41.	Ventilation		£:
	Contents of the HACCP list the food safety hazards, critical points, critical limits, procedures, corrective actions.	control	42.	Plumbing and Sewage		a.
16.	Records documenting implementation and monitoring of the HACCP plan.			Water Supply	2	#
17.	The HACCP plan is signed and dated by the responsible establishment individual.		1	Dressing Rooms/Lavato  Equipment and Utensils	ries	2
	Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements			Sanitary Operations		*
18.	Monitoring of HACCP plan.		47	Employee Hygiene		
	Verification and validation of HACCP plan.	1	1	Condemned Product Co	ntrol	
20.	Corrective action written in HACCP plan.				112 - 12 N 10000200	
21.	Reassessed adequacy of the HACCP plan.			Part F - In	spection Requirements	
22.	Records documenting: the written HACCP plan, monitoring critical control points, dates and times of specific event occ		49.	Government Staffing		A.
	Part C - Economic / Wholesomeness		50.	Daily Inspection Coverage	ge	
23.	Labeling - Product Standards		51.	Enforcement		
24.	Labeling - Net Weights		1.	Humane Handling		
25.	General Labeling		32,	numane nanoling		0
26.	Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moi	sture)	53.	Animal Identification		0
	Part D - Sampling Generic E. coli Testing	- 18	54.	Ante Mortem Inspection		0
27.	Written Procedures	0	55.	Post Mortem Inspection		0
	Sample Collection/Analysis	: 0	1			100
	Records	_ 0		Part G - Other Regu	latory Oversight Requirements	
5	Salmonella Performance Standards - Basic Requi	ements	56.	European Community Dir	rectives	0
30.	Corrective Actions	. 0	57.	Monthly Review		
31.	Reassessment	. 0	58.		nes and Salmonella (RTE)	
32.	Written Assurance	O	59.			

Establishment # 022: TIV-TIRAT TZVI Meat Specialities, M.P. Beit She'an Valley, Israel; May 20, 2008; poultry meat (chicken and goose) processing and (not for U.S. export) beef grinding

There were no significant findings to report after consideration of the nature, extent, and degree of all observations.

61. NAME OF AUDITOR

Gary D. Bolstad, DVM

62. AUDITOR SIGNATURE AND DATE for Mom good H. Chaudry 8/4/08

## United States Department of Agriculture Food Safety and Inspection Service

ESTABLISHMENT NAME AND LOCATION     2. AUDI		2. AUDIT DATE	3. ESTABLISHMENT NO.		4. NAME OF COUNTRY		
	Yehiam Meat Products	May 27, 2008	27, 2008 104		Israel		
	Kibbutz Yehiam	5. NAME OF AUDIT	IAME OF AUDITOR(S)		6. TYPE OF AUDIT		
		Gary D. Bolsta	ad D	VM	(37)		
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Pa	rt A - Sanitation Standard Operating Procedures (S: Basic Requirements	SOP) Audit Results			rt D - Continued nomic Sampling	Audi Resul	
7.	Written SSOP		33	Scheduled Sample			
8.	Records documenting implementation.	::*	34	. Species Testing			
9.	Signed and dated SSOP, by on-site or overall authority.		35	Residue		. 0	
S	Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements			Part E -	Other Requirements	13	
10	Implementation of SSOP's, including monitoring of implemen	tation.	36	. Export			
11	Maintenance and evaluation of the effectiveness of SSOP's.		37	. Import			
12	<ul> <li>Corrective action when the SSOPs have failed to prevent dire product contamination or adulteration.</li> </ul>	ct	38	. Establishment Grounds a	and Pest Control		
13	Daily records document item 10, 11 and 12 above.		39	. Establishment Construct	ion/Maintenance		
	Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements			. Light		18 7	
14.	Developed and implemented a written HACCP plan .	17.	7"	. Ventilation			
15.	Contents of the HACCP list the food safety hazards, critical opoints, critical limits, procedures, corrective actions.	control		Plumbing and Sewage	*	2.45	
16.	Records documenting implementation and monitoring of the HACCP plan.			Water Supply	#200   17	11 1991	
17.	The HACCP plan is signed and dated by the responsible establishment individual.			Dressing Rooms/Lavator  Equipment and Utensils	les	140	
	Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		46.	Sanitary Operations		3 3	
18.	Monitoring of HACCP plan.	6	47.	Employee Hygiene			
19.	Verification and validation of HACCP plan.	Ę.	48.	Condemned Product Cor	ntrol		
20.	Corrective action written in HACCP plan.	100	1	D 45 1-			1
	Reassessed adequacy of the HACCP plan.	100	1	Part F - In	spection Requirements .		
22.	Records documenting: the written HACCP plan, monitoring of critical control points, dates and times of specific event occur	f the rences.	49.	Government Staffing		Manage	
	Part C - Economic / Wholesomeness		50.	Daily Inspection Coverag	e		
23.	Labeling - Product Standards	941	51.	Enforcement			
24.	Labeling - Net Weights		60	Warner Headler		,	
25.	General Labeling		52.	Humane Handling		. 0	
26.	Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moistr	ure)	53.	Animal Identification		O	
(*)	Part D - Sampling Generic <i>E. coli</i> Testing		54.	Ante Mortem hspection		0	
27.	Written Procedures	0	55.	Post Mortem hspection	*	0	
28.	Sample Collection/Analysis	. 0					
29.	Records	0		Part G - Other Regul	atory Oversight Requirement	5	J.
S	Salmonella Performance Standards - Basic Require	ments	56.	European Community Dire	ectives	0	
30.	Corrective Actions	0	57.	Monthly Review		. 10	
31.	Reassessment	. 0	58.	Listeria monocytog	enes & Salmonella (RTE)	**************************************	
32.	Written Assurance	О	59.				

FSIS 5000-6 (04/04/2002)

60. Observation of the Establishment

Est. # 104, Yehiam Meat Products, Kibbutz Yehiam, Israel; May 27, 2008; operations: turkey meat and (not for U.S. export) chicken and beef processing

There were no significant findings to report after consideration of the nature, extent, and degree of all observations.

61. NAME OF AUDITOR

Gary D. Bolstad, DVM

for Mangoos H-Chaudry 8/4/08

#### United States Department of Agriculture Food Safety and Inspection Service

1. 1	ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. E	STABLISHMENT NO.	4. NAME OF COUNTRY	
(	Of-Tov (Shean) / Hodu Tov (Shean) Ltd.	May 25, 2008	10	)8	Israel	
	Beit-Shean	5. NAME OF AUDIT	OR(S)		6. TYPE OF AUDIT	
		Gary D. Bolsta	id, D	VM	X ON-SITE AUDIT DOC	UMENT AUDIT
nı.	ce an X in the Audit Results block to in	ACTION IN THE CONTRACT OF A SHOOT			1,	
	t A - Sanitation Standard Operating Procedures		I		art D - Continued	Audit
rai	Basic Requirements	S (SSOP) Audit Results			onomic Sampling	Results
7.	Written SSOP		33.	Scheduled Sample		
8.	Records documenting implementation.	-	34.	Species Testing		2
9.	Signed and dated SSOP, by on-site or overall authority.		35.	Residue		-
S	anitation Standard Operating Procedures (SSO Ongoing Requirements	P)		Part E	- Other Requirements	
10.	Implementation of SSOP's, including monitoring of imple	mentation.	36.	Export		34
11.	Maintenance and evaluation of the effectiveness of SSOF	o's.	37.	Import		.02
12.	Corrective action when the SSOPs have failed to prevent product contamination or adulteration.	direct	38.	Establishment Grounds	and Pest Control	19
13.	Daily records document item 10, 11 and 12 above.		39.	Establishment Constru	ction/Maintenance	
	Part B - Hazard Analysis and Critical Control		40.	Light		
	Point (HACCP) Systems - Basic Requirements		41.	Ventilation		
	Developed and implemented a written HACCP plan .	ical control	42	Plumbing and Sewage	(*.)	
	Contents of the HACCP list the food safety hazards, crit points, critical limits, procedures, corrective actions.	13	1	Water Supply		12
16.	Records documenting implementation and monitoring of HACCP plan.	the			COMPANY Y	Of.
17.	The HACCP plan is signed and dated by the responsible establishment individual.	e		Dressing Rooms/Lavat . Equipment and Utensil		.00
	Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements			Sanitary Operations		
18.	Monitoring of HACCP plan.	19	47.	Employee Hygiene		
19.	Verification and validation of HACCP plan.	31		Condemned Product C	ontrol	
20	Corrective action written in HACCP plan.	4 2	40.	Condemned Flodder C	ontro	
	Reassessed adequacy of the HACCP plan.			Part F - I	nspection Requirements	
22.			49.	Government Staffing		
	Part C - Economic / Wholesomeness		50.	Daily Inspection Covera	age	
23.	Labeling - Product Standards	,		=24V - ACC		25
24.	Labeling - Net Weights	1.*	51.	Enforcement		13
25.	General Labeling		52.	Humane Handling		0
26.	Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/	Moisture)	53.	Animal Identification		0
	Part D - Sampling Generic E. coli Testing		54.	Ante Mortem Inspection	Y	0
27.	Written Procedures	. 0	55.	Post Mortem Inspection	12	. 0
28.	Sample Collection/Analysis	0	1	,		
	Records	. 0	1	Part G - Other Reg	ulatory Oversight Requirements	
	almonella Performance Standards - Basic Reg		56.	European Community D	irectives	0
	Corrective Actions	0	57.	Monthly Review		
	Reassessment	0	58.		ž.	4
	Written Assurance	0	59.	a.		1.5
water.	The state of the s	J	100000			

Israel Establishment 108,

05/25/2008

Chicken & turkey processing

There were no significant findings to report after consideration of the nature, extent, and degree of all observations.

61. NAME OF AUDITOR
Dr. Faizur R. Choudry, DVM

for Mangoos H. Chaudry 8/4/08

## United States Department of Agriculture Food Safety and Inspection Service

1,	ESTABLISHMENT NAME AND LOCATION     2. AUDIT		UDIT DATE 3. ESTABLISHMENT NO.		. 4. NAME OF COUNTRY		
•	Fnuva Galil	May 26, 2008	2	09	Israel		
1	Kiryat Shmona	5. NAME OF AUDIT	NAME OF AUDITOR(S)		6. TYPE OF AUDIT		
		Gary D. Bolsta	ad. D	VM	X ON-SITE AUDIT DOC		
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	ace an X in the Audit Results block to ind		liand			oie.	
Pa	rt A - Sanitation Standard Operating Procedures (S Basic Requirements	SSOP) Audit Results			art D - Continued onomic Sampling	Audit Results	
7.	Written SSOP		33	Scheduled Sample		*	
8.	Records documenting implementation.	9	34	Species Testing		30	
9.	Signed and dated SSOP, by on-site or overall authority.		1	Residue		. 0	
S	anitation Standard Operating Procedures (SSOP) Ongoing Requirements	18			Other Requirements		
10.	Implementation of SSOP's, including monitoring of impleme	ntation.	36.	Export			
	Maintenance and evaluation of the effectiveness of SSOP's.		37.	Import		*	
12.	Corrective action when the SSOPs have falled to prevent directive contamination or adulteration.	ect	38.	Establishment Grounds	and Pest Control	*0	
13.	Daily records document item 10, 11 and 12 above.		39.	Establishment Construc	tion/Maintenance		
	Part B - Hazard Analysis and Critical Control	13.77	40.	Light		E	
14	Point (HACCP) Systems - Basic Requirements  Developed and implemented a written HACCP plan .		41.	Ventilation		8	
	Contents of the HACCP list the food safety hazards, critical points, critical limits, procedures, corrective actions.	control	42.	Plumbing and Sewage		N:	
16.	Records documenting implementation and monitoring of the HACCP plan.	× *	43.	Water Supply			
17.	The HACCP plan is signed and dated by the responsible establishment individual.	<u>«</u>	1	Dressing Rooms/Lavato		16	
	Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements			Equipment and Utensils Sanitary Operations		<b>8</b> 7	
18	Monitoring of HACCP plan.		100	DESCRIPTION OF THE PROPERTY OF			
	Verification and validation of HACCP plan.	\$	47.	Employee Hygiene		Ę.	
			48.	Condemned Product Co	ontrol		
	Corrective action written in HACCP plan.			Part F - Ir	spection Requirements	(1.5)	
	Reassessed adequacy of the HACCP plan.	of the					
	Records documenting: the written HACCP plan, monitoring critical control points, dates and times of specific event occ	currences.	49.	Government Staffing		4/1	
	Part C - Economic / Wholesomeness		50.	Daily Inspection Covera	ge		
	Labeling - Product Standards		51,	Enforcement			
	Labeling - Net Weights	102	52.	Humane Handling		38	
10000	General Labeling						
26.	Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moi	:	53.	Animal Identification		O	
	Part D - Sampling Generic E. coli Testing		54.	Ante Mortem hspection		0	
27.	Written Procedures	0	55.	Post Mortem Inspection		0	
28,	Sample Collection/Analysis	0	1	Dark C. Other Beau	latory Oversight Requirements		
29.	Records	O	1	Part G - Other Regu	natory Oversignt Requirements		
5	Salmonella Performance Standards - Basic Requi	rements	56.	European Community Di	rectives .	0	
30	Corrective Actions	0	57.	Monthly Review			
	Ressessment	0	58.	Listeria monocyto	genes & Salmonella (RTE)		
32.	Written Assurance	0	59.				

Est. 209, Tnuva Galil; Qiryat Shemona, Israel; May 26, 2008; poultry processing into breaded nuggets and other fully-cooked not-shelf-stable products

There were no significant findings to report after consideration of the nature, extent, and degree of all observations.

61. NAME OF AUDITOR Gary D. Bolstad, DVM 62. AUDITOR SIGNATURE AND DATE Chaudry 8/4/08



#### STATE OF ISRAEL

Ministry of Agriculture and Rural Development Veterinary Services and Animal Health, P.O.B 12, Beit – Dugan, 50250

Araguse 25, 2008.

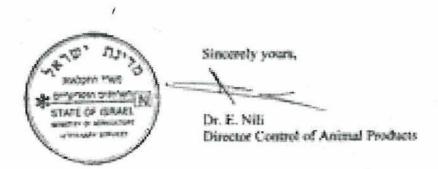
Mr. Donald Smart Director International Audit Staff Office of International Affairs F.S.I.S. U.S.D.A Washington D.C. - 20250 USA

Dear Mr. Smart.

Re: FSIS on site audit of laraci's Poultry Inspection System 11/05 - 04/06/08

Further to your letter to Dr. M. Chaimovitz dated August 6, 2008, kindly received hereby the response of the Israeli Veteriaary Services to the audit report:

- 1. There are no comments to audit report.
- Due to midst findings, the director of the Veterinary Services decided to cancel the use of private fluctochem laboratory in Ness-Ziona for testing of samples of eligible products originated from plants certified for export to the U.S.



Ca

- Dr. M. Chaimovitz, Dissector Veterinary Services and Animal Health.