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

JAN 27 2010

Mr. Robert Houston
Chief Veterinary Officer
Department of Agriculture for Northern Ireland
DARD
Dundonald House
Upper Newtownards Road
Belfast, BT 4 3SB
Northern Ireland

Dear Mr. Houston:

The Food Safety and Inspection Service (FSIS) conducted an on-site audit of Northern Ireland's meat inspection system October 7 to October 16, 2009. Enclosed is a copy of the draft final audit report. You are invited to provide comments regarding the information in the audit report. Comments received from the government of Northern Ireland will be included as an attachment to the final report. Comments must be provided within 60 days of the receipt of this letter.

If you have any questions regarding the FSIS audit or need additional information, please contact me at telephone number (202) 205-3969, by facsimile at (202) 720-0676, or electronic mail at james.adams5@fsis.usda.gov.

Sincerely,

James Adams, DVM
Director
International Audit Staff
Office of International Affairs

Enclosure

DRAFT FINAL REPORT OF AN AUDIT CARRIED OUT IN NORTHERN IRELAND COVERING NORTHERN IRELAND'S MEAT INSPECTION SYSTEM

OCTOBER 7 THROUGH OCTOBER 16, 2009

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 (Food Standard Agency)
CCP	Critical Control Point
CVO	Chief Veterinary Officer
DARD	Department of Agriculture and Rural Development
DVO	Divisional Veterinary Office
EC	European Commission
E. coli	Generic *Escherichia coli*
FSA	Food Standards Agency
FSIS	Food Safety and Inspection Service
HACCP/PR	Hazard Analysis and Critical Control Points/Pathogen Reduction Systems
Lm	*Listeria monocytogenes*
NOID	Notice of Intent to Delist
OV	Official Veterinarian
Salmonella	*Salmonella* species
SMI	Senior Meat Inspector
SPS	Sanitation Performance Standards
SPVO	Senior Principal Veterinary Officer
SSOP	Sanitation Standard Operating Procedure(s)
VEA	European Community/United States Veterinary Equivalence Agreement
VPHU	Veterinary Public Health Unit
VSG	Veterinary Service Group

1. SUMMARY

1.1 Description/Eligibility

This report summarizes the outcome of an audit conducted in Northern Ireland from October 7 to October 16, 2009. This was a routine audit. Northern Ireland is eligible to export raw (not ground) pork products to the United States. At the time of the audit, one slaughter and processing establishment and one cold storage facility were eligible to export to the United States. Between June 11, 2008 and October 7, 2009, Northern Ireland exported a total of 2,373,984 pounds of raw pork products to the United States, of which more than 1,449,490 pounds were reinspected at U.S. ports of entry (POE). The activities of the current audit appear in the table below.

The findings of the previous audit during May 29 through June 11, 2008 resulted in no restrictions of any Northern Ireland establishment's ability to export raw pork meat to the U.S.

1.2 Comparison of the Current Audit and the Previous Audit

		05/29-06/11, 2008	10/07-10/16, 2009
Levels of Government Oversight Audited			
	Headquarters	1	1
	Regional	1	1
	Establishment Level	1	2
Laboratories Audited			
	Microbiology	2	1
	Residue	2	1
Establishments Audited			
	Slaughter/processing	1	1
	Cold Storage	1	1
Enforcement Actions Initiated			
	NOID	0	0
	Delistment	0	0
Risk Area Findings			
	Sanitation Controls (SSOP, SPS)	2	1
	Animal Disease Controls	0	0
	Slaughter/Processing (PR/HACCP)	0	4
	Residue Controls	0	0
	Microbiology Controls	0	0
	Inspection/Enforcement Controls	0	5

1.3 Summary Comments for the Current Audit

The results of this routine audit reflected an increase in the total number of audit non-compliances over the previous audit. The increase in audit non-compliances were in

Slaughter/Processing (PR/HACCP) and Inspection/Enforcement Controls risk area findings. Specific non-compliances are noted on the attached establishment report and in sections 10 and 12.

Although some FSIS requirements were not fully enforced in the audited establishment, the review of the government oversight of Northern Ireland's meat inspection system at the central, divisional, and local (establishment) offices demonstrated that inspection system controls were in place. No establishments were delisted or received a Notice of Intent to Delist (NOID) by the CCA.

All non-compliances reported during the previous FSIS audit (2008) had been addressed and corrected. There were no repeat non-compliances.

2. INTRODUCTION

The Food Safety and Inspection Service (FSIS) of the U.S. Department of Agriculture (USDA) conducted an audit of Northern Ireland's meat inspection system on October 7 through October 16, 2009.

An entrance meeting was held on October 7, 2009, in Belfast with the Central Competent Authority (CCA), the Food Standards Agency (FSA) and the Department of Agriculture and Rural Development (DARD). At this meeting, the auditor confirmed the objective and scope of the audit and the auditor's itinerary and requested additional information needed to complete the audit of Northern Ireland's meat inspection system.

The auditor was accompanied during the entire audit by representatives from the DARD.

3. OBJECTIVE OF THE AUDIT

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

In pursuit of the objective, the following sites were visited: the headquarters of the CCA; one divisional/regional inspection office; two local inspection offices; one slaughter and processing establishment (hereinafter referred to as "the establishment"); one cold-storage facility; one residue laboratory; and one microbiology laboratory.

4. PROTOCOL

This on-site audit was conducted in four parts. One part involved visits with CCA and DARD 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 involved on-site visits to the slaughter and processing establishment and the cold-storage facility. The fourth part consisted of the audits of the residue and microbiology laboratories.

Program effectiveness determinations of Northern Ireland's inspection system focused on five areas of risk: (1) sanitation controls, including the implementation and operation of SSOP, (2) animal disease controls, (3) slaughter/processing controls, including the implementation and operation of Hazard Analysis/Critical Control Point (HACCP) programs, (4) residue controls, and (5) enforcement controls. Northern 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 Northern 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.

During the entrance meeting, the auditor explained to the CCA that Northern Ireland's 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 animals, 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. Third, the auditor would audit against any equivalence determinations that have been made by FSIS for Northern Ireland under provisions of the Sanitary/Phytosanitary Agreement. One alternative procedure has been recognized by FSIS as equivalent:

- FSIS has determined that testing for *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 U.S. laws and regulations, in particular:

- The Federal Meat Inspection Act (21 U.S.C. 601 et seq.).
- The Federal Meat Inspection Regulations (9 CFR, Parts 301 to End), which include the Pathogen Reduction/HACCP regulations.

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

- Council Directive 64/433/EEC, of June 1964, entitled "Health Problems Affecting Intra-Community Trade in Fresh Meat"
- Council Directive 96/23/EC, of 29 April 1996, entitled "Measures to Monitor Certain Substances and Residues Thereof in Live Animals and Animal Products"
- Council Directive 96/22/EC, of 29 April 1996, entitled "Prohibition on the Use in Stock farming 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 FSIS audit of Northern Ireland's meat inspection system conducted in May 22 through May 29, 2007, identified the following non-compliances:

- An employee in the cutting room was observed contacting a plastic container liner for edible product with her boots.

The FSIS audit of Northern Ireland's meat inspection system conducted in May 29 through June 11, 2008, identified the following non-compliances:

- An establishment employee was observed not properly sanitizing his knife between removing intestines and making a muscle cut in the slaughter room in the establishment.
- In one establishment, pieces of intestine were observed on the moving viscera table after the washing procedure.
- According to the written QC procedure, inter-laboratory check samples are to be tested once each six months. This frequency was not maintained.

7. MAIN FINDINGS

7.1 Government Oversight

7.1.1 CCA Control system

The food safety system in Northern Ireland is based on collaboration between Food Standards Agency (FSA) and the Department of Agriculture and Rural Development (DARD).

The FSA is an independent body within the United Kingdom's Parliament. The FSA was established to protect consumer interest in relation to food and to provide food safety oversight for Northern Ireland. The FSA is the Central Competent Authority (CCA) for food safety and standards. It has an office in Belfast and works closely with DARD.

Northern Ireland's meat inspection system is primarily administered by the Veterinary Service Group (VSG), an agency within DARD. Within the VSG there is a Veterinary

Public Health Unit (VPHU). The primary goal of the VPHU in approved establishments is to protect the public health by ensuring the food business operator fulfils his or her obligation to produce safe food. This particular function is carried out on behalf of the FSA. The VPHU is comparable to the Food Safety and Inspection Service (FSIS) in the United States.

The VPHU also actively encourages the maintenance and improvement of animal health and welfare standards in slaughterhouses and maintains vigilance for animal diseases.

7.1.2 Ultimate Control and Supervision

The VSG in Belfast has the ultimate control and supervision of Northern Ireland's meat inspection system and has the authority to add or remove establishments from the list of establishments certified to export to the United States.

The VSG is managed by a Chief Veterinary Officer (CVO), a Deputy CVO for Logistics, and a Senior Principal Veterinary Officer (SPVO) who is the Director of the VPHU. The VSG employs a total of 659 program employees. The SPVO oversees three Divisional Veterinary Offices (DVOs) in Coleraine, Newry, and Loughgall. Each DVO is headed by a divisional veterinary officer (front line supervisor), who provides direct supervision over a number of meat inspection teams, official veterinarians, and meat inspectors assigned to establishments certified to export meat to the United States.

7.1.3 Assignment of Competent, Qualified Inspectors

The VPHU has 30 Official Veterinarians (OVs), 12 Senior Meat Inspectors (SMIs), and 103 Meat Inspectors (MIs). There are 20 Meat Inspection Teams which are managed by three DVOs. Each Meat Inspection Team consists of an OV, in most cases an SMI, and a number of MIs to carry out the responsibilities of Northern Ireland's domestic and export meat inspection programs, including related enforcement activities.

The OV has the authority to suspend an establishment's production operations any time the wholesomeness and safety of the product is jeopardized. The OVs report directly to the divisional veterinary officers and consult him/her on all decisions regarding enforcement activities. The decision as to whether an establishment is failing to meet U.S. import requirements, and the recommendation that it should be delisted is a combined effort of the OV, the DVO, and headquarters officials. The CVO will make the ultimate decision and will advise the FSA officials who will then delist or suspend the recommended establishment.

The OV has direct supervision over all other inspection personnel assigned to certified establishments, including relief veterinary officers, SMIs, and MIs. The OV has overall responsibility for the following functions:

- Health certification of fresh meat
- Ante-mortem health inspection of animals
- Monitoring of animal welfare at slaughter

- Post-mortem health inspection of slaughtered animals
- Residue sampling
- Seizure of unfit meat or meat not produced in accordance with food hygiene requirements
- Verifying food business operators compliance with food law, in particular the specific requirements of Regulations (EC) No. 852/ 2004 and 853/2004
- Verifying that other animal by-products are handled and disposed of correctly by the food business operator.

The VPHU Manual for Official Controls (MOC) provides details of the tasks, responsibilities, and duties of the VPHU officers in approved establishments supervised by the VPHU.

These official controls include: inspection, verification and audit, decision making and action to be taken following official controls, sampling procedures, and monitoring and surveillance programs

All inspection personnel assigned to establishments certified to export meat to the United States are full-time government employees receiving no remuneration from either industry or establishment personnel. Inspection personnel may not engage in outside employment.

7.1.4 Authority and Responsibility to Enforce the Laws

The VPHU has the authority for carrying out Northern Ireland's meat inspection program including oversight and enforcement of the FSIS regulatory requirements in establishments certified to export to the United States. The VPHU not only has the authority to approve establishments for export to the United States, but also has the responsibility for withdrawing such approval when establishments do not meet FSIS requirements.

7.1.5 Adequate Administrative and Technical Support

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

7.2 Headquarters and Divisional Office Audit

The auditor conducted a review of inspection system documents at the headquarters of the VPHU, located in Belfast. The auditor also conducted a review of records and interviewed inspection officials in the Divisional Veterinary Office located in Newry for the purpose of determining the level of government oversight, supervisory structure, and to review records pertinent to the U.S. certified establishments. The record review focused primarily on food safety hazards and included the following:

- Government oversight documents, including organizational structure

- Periodic supervisory reviews
- 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 U.S. certified establishments
- Inspection records and enforcement actions such as withholding, suspending, or withdrawing inspection services from or delisting an establishment that is certified to export product to U.S.
- 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 Northern Ireland's inspection program
- Humane handling and slaughter methods

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

8. ESTABLISHMENT AUDITS

The FSIS auditor visited a total of two establishments: one slaughter and processing establishment and one cold storage facility. No establishments were delisted or received a Notice of Intent to Delist (NOID) for failure to meet U.S. requirements during the course of the audit.

Specific non-compliances are noted on the attached individual establishment reports.

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, and intra-laboratory check sample and quality assurance programs, including standards books and corrective actions.

The following government residue laboratory was reviewed:

The Veterinary Sciences Division in Belfast was performing residue analyses on product destined for the U.S. within the scope of the Northern Ireland National Residue Program.

No concerns arose as a result of this review.

Microbiology laboratory audits focus on analyst qualifications, sample receipt, timely analysis, analytical methodologies, analytical controls, recording and reporting of results, and check sample programs.

The following private microbiology laboratory was reviewed:

The Elite Technical Laboratory in Dungannon was performing microbiological analyses for *Salmonella* species on samples of U.S.-eligible products from the certified establishment.

No concerns arose as a result of this review.

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 the establishment and the cold-storage facility, and except as noted below, Northern 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, Northern 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)

The establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOP were being met, according to the criteria employed in the U.S. domestic inspection program. The SSOP in the audited establishment was found to meet the basic FSIS regulatory requirements; however, the following non-compliance was noted:

- In one slaughter and processing establishment, swine carcasses with dressing defects (fecal contamination) or pathology (pneumonia) on the trim line were in direct contact with each other causing cross contamination.

10.2 Sanitation Performance Standards (SPS)

The FSIS regulations in 9 CFR 416.2 to 416.5 set forth specific sanitation performance standards that establishments must meet to prevent the creation of insanitary conditions that could cause the adulteration of meat and poultry products.

The SPS in both audited establishments were found to meet FSIS regulatory requirements.

10.3 EC Directive 64/433

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

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 Northern Ireland's inspection system had adequate controls in place.

There had been no outbreaks of animal diseases with public health significance since the previous 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 humane handling and humane slaughter; ingredients identification; control of restricted ingredients, formulations, processing schedules, equipment, and records; and processing controls of cured, dried, and cooked products. The controls also include the implementation of HACCP systems in all slaughter and processing establishments and implementation of a testing program for *E. coli* in slaughter establishments.

12.1 Humane Handling and Slaughter

No non-compliance was reported.

12.2 Hazard Analysis and Critical Control Points (HACCP) Implementation

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

The HACCP programs were reviewed during the on-site audit of one slaughter and processing establishment. The HACCP plan in this establishment was found to meet basic FSIS requirements with the following exceptions.

In the slaughter and processing establishment:

- The establishment monitoring records for CCP 1 (zero tolerance for fecal and ingesta) did not include the times when the specific events occurred.
- The establishment monitoring records for CCP 1 (zero tolerance for fecal and ingesta) did not include the initials of the responsible establishment employee(s) making the entries.
- The establishment verification records for the calibration of process-monitoring instruments did not document the times when the specific events occurred.
- The establishment verification records for the calibration of process-monitoring instruments did not include the initials of the responsible establishment employee(s) making the entries.

12.3 Testing for Generic *Escherichia. coli* (*E. coli*)

Under an equivalence agreement, European Community Member States test for *Enterobacteriaceae* and Total Viable Count in lieu of generic *E. coli.*

One slaughter and processing establishment was required to meet the regulatory requirements for the alternative testing program for *Enterobacteriaceae* and Total Viable Count and was evaluated according to the criteria set out in this program. This testing was conducted properly in the audited establishment.

12.4 Testing for *Listeria monocytogenes*

The audited establishments were not producing ready-to-eat products for export to the United States and were not required to meet the FSIS requirements for *Listeria monocytogenes* testing. Northern Ireland exports only raw pork to the United States.

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.

Northern Ireland's National Residue Control Program for 2009 was being followed as it was written.

13.1. EC Directive 96/22

In the Veterinary Sciences Division, the provisions of EC Directive 96/22 were effectively implemented.

13.2. EC Directive 96/23

In the Veterinary Sciences Division, the provisions of EC Directive 96/22 were effectively implemented.

14. ENFORCEMENT CONTROLS

The fifth of the five risk areas that the FSIS auditors 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 establishments and was documented.

14.2 Testing for *Salmonella* Species

The slaughter and processing establishment was required to test for *Salmonella* in raw product. Northern Ireland has adopted the FSIS requirements for testing for *Salmonella* to meet the *Salmonella* Performance Standards.

14.3 Species Verification

Species verification was being conducted as required. The inspection personnel in the cold storage facility were collecting five samples for each U.S. export certificate.

14.4 Periodic Supervisory Reviews

Periodic supervisory reviews of the certified establishment were being performed monthly and documented as required by the CCA.

14.5 Inspection System Controls

The CCA had controls in place for ante-mortem and post-mortem inspection procedures and dispositions; restricted product and inspection samples; disposition of dead, dying, diseased, or disabled animals; and 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 addition, controls were in place for the importation of only eligible livestock from other countries, i.e., only from eligible third countries, and the importation of only eligible meat products from other counties and certified establishments within those 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. EXIT MEETING

An exit meeting was held on October 16, 2009, in Belfast with the CCA. In this meeting, the auditor presented the primary findings.

The CCA understood and accepted the findings.

Nader Memarian, DVM
Senior Program Auditor

16. ATTACHMENT TO THE AUDIT REPORT

Individual Foreign establishment Audit Form

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
Vion UK Pork - Cookstown 70 Molesworth Road Cookstown Co. Tyrone BT80 8PJ	10/12/2009	UK9052	Northern 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.	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.	
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	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	X
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	
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment Date: 10/12/2009 Est #: UK9052 (Vion UK Pork - Cookstown [S/P]) (Co. Tyrone, Northern Ireland)

11/46/51 Swine carcasses with dressing defects (fecal contamination) or pathology (pneumonia) on the trim line were in direct contact with each other causing cross contamination. FSIS regulatory requirements [9CFR § 416.4, 416.14, and 416.17] were not met. [2]

Inspection personnel took immediate control action. The slaughter line was stopped in order to clear the trim line. The establishment management proposed to modify its trim line design.

22/51 A) The establishment monitoring records for CCP 1 (zero tolerance for fecal and ingesta) did not include the times or the initials of the responsible establishment employee(s) making the entries. [1]
B) The establishment verification records for the calibration of process-monitoring instruments did not document the times when the specific events occurred. [1]
C) The establishment verification records for the calibration of process-monitoring instruments did not include the initials of the responsible establishment employee(s) making the entries. [1]

The aforementioned findings (22/51) were not meeting FSIS regulatory requirements. [9 CFR § 417.5 and 417.8]
These HACCP record keeping non-compliances had not been identified in the review of records by the establishment personnel or in the HACCP verifications activities performed by Northern Ireland inspection service for the last 90 days.

The FSIS auditor was assured by the inspection officials and/or establishment personnel that all deficiencies found in this audit would be corrected immediately.

61. NAME OF AUDITOR	62. AUDITOR SIGNATURE AND DATE
Nader Memarian, DVM	

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
Granville Food Care LTD Granville Industrial Estate Dungannon BT701NJ	10/14/2009	UK9022	Northern 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	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP	O	33. Scheduled Sample	O
8. Records documenting implementation.	O	34. Species Testing	O
9. Signed and dated SSOP, by on-site or overall authority.	O	35. Residue	O
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements		**Part E - Other Requirements**	
10. Implementation of SSOP's, including monitoring of implementation.	O	36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.	O	37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	O	38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.	O	39. Establishment Construction/Maintenance	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements		40. Light	
14. Developed and implemented a written HACCP plan .	O	41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	O	42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.	O	43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.	O	44. Dressing Rooms/Lavatories	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		45. Equipment and Utensils	
18. Monitoring of HACCP plan.	O	46. Sanitary Operations	
19. Verification and validation of HACCP plan.	O	47. Employee Hygiene	
20. Corrective action written in HACCP plan.	O	48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.	O	**Part F - Inspection Requirements**	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	O	49. Government Staffing	
Part C - Economic / Wholesomeness		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	
24. Labeling - Net Weights		52. Humane Handling	O
25. General Labeling		53. Animal Identification	O
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	O	54. Ante Mortem Inspection	O
Part D - Sampling Generic *E. coli* Testing		55. Post Mortem Inspection	O
27. Written Procedures	O	**Part G - Other Regulatory Oversight Requirements**	
28. Sample Collection/Analysis	O	56. European Community Directives	
29. Records	O	57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions	O	59.	
31. Reassessment	O		
32. Written Assurance	O		

60. Observation of the Establishment

Date: 10/14/2009 Est #: UK9022 (Granville Food Care LTD [CS]) (Dungannon, Northern Ireland)

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

61. NAME OF AUDITOR	62. AUDITOR SIGNATURE AND DATE
Nader Memarian, DVM	