



United States
Department of
Agriculture

Food Safety
and Inspection
Service

Washington, D.C.
20250

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Dr. Isabelle Chmitelin
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Ministry of Agriculture
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Cedex 15, France

Dear Dr. Chmitelin:

The Food Safety and Inspection Service has completed an on-site audit of France's meat and poultry inspection system. The audit was conducted from April 15 – May 16, 2003. Enclosed is a copy of the final audit report. Comments received from the government of France have been included as an attachment to the final report.

If you have questions regarding the audit or need additional information, please contact me by telephone at 202-720-3781, by facsimile at 202-690-4040 or by email at sally.stratmoen@fsis.usda.gov.

Sincerely,

Sally Stratmoen
Director
International Equivalence Staff
Office of International Affairs

Enclosure

cc:

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Christian Berger, Counselor for Agriculture, Embassy of France, Washington, DC
Agriculture, Fisheries, Food Safety and Consumer Section, EU Mission to the US
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FINAL

JAN 12 2004

FINAL REPORT OF AN AUDIT CARRIED OUT IN FRANCE
COVERING FRANCE'S MEAT AND POULTRY INSPECTION SYSTEM

APRIL 15 THROUGH MAY 16, 2003

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 [<i>Direction Générale de l'Alimentation</i> , or General Food Directorate]
DGAL	<i>Direction Générale de l'Alimentation</i> , or General Food Directorate
DSV	<i>Départementale Service Veterinaire</i> , Veterinary Service of the Department
DDSV	Director of the DSV
<i>E. coli</i>	<i>Escherichia coli</i>
FSIS	Food Safety and Inspection Service
PR/HACCP	Pathogen Reduction / Hazard Analysis and Critical Control Point Systems
<i>Salmonella</i>	<i>Salmonella</i> species
SSOP	Sanitation Standard Operating Procedures
VEA	European Community/United States Veterinary Equivalence Agreement

1. INTRODUCTION

The audit took place in France from April 15 through May 16, 2003.

An opening meeting was held on April 15, 2003, in Paris with the Central Competent Authority (CCA), the *Direction Générale de l'Alimentation* (DGAL), or General Food Directorate. At this meeting, the auditor confirmed the objective and scope of the audit, the auditor's itinerary, and requested additional information needed to complete the audit of France's meat and poultry 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.

2. OBJECTIVE OF THE AUDIT

The objective of this audit was twofold. This was a routine annual audit 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. It was also a follow-up audit to assess the status of corrective actions taken as a result of deficiencies identified during the previous FSIS audit of France's meat and poultry inspection system, conducted in October-November 2002.

In pursuit of the objective, the following sites were visited: the headquarters of the CCA, three *Départementale Services Veterinaires* (DSV) inspection offices (equivalent to Regional Offices), two laboratories performing analytical testing on United States-destined product, three swine slaughter and pork cutting establishments, two poultry slaughter and processing establishments, and five other meat and/or poultry processing establishments.

Competent Authority Visits			Comments
Competent Authority	Central	1	
	<i>Département</i>	3	
	Local	10	Establishment level
Laboratories		2	
Meat Slaughter and Processing Establishments		3	
Meat Processing Establishments		2	
Poultry Slaughter and Processing Establishments		2	
Poultry Processing Establishments		2	
Meat and Poultry Processing Establishments		1	

3. PROTOCOL

This on-site audit was conducted in four parts. One part involved visits with CCA officials to discuss oversight programs and practices, including enforcement activities. The second part involved an audit of a selection of records in France's inspection headquarters or regional offices. The third part involved on-site visits to 10 establishments: five slaughter and processing establishments and five processing establishments. The fourth part involved visits to one government laboratory and one private microbiology laboratory. The *Laboratoire Départemental Vétérinaire du Finistère* in Quimper was conducting analyses of field samples for France's national residue control program and analyses of field samples for the presence of *Salmonella* species. The laboratory in Establishment 29-225-01 (Jean Hénaff S.A.S., in Pouldreuzic) was conducting analyses of field samples for the presence of generic *Escherichia coli* (*E. coli*).

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

At the opening meeting, the auditor explained to the CCA that their inspection system would be audited in accordance with three areas of focus. First, under provisions of the European Community/United States Veterinary Equivalence Agreement (VEA), the FSIS auditor would audit the meat inspection system against European Commission Directive 64/433/EEC of June 1964; European Commission Directive 96/22/EC of April 1996; and European Commission Directive 96/23/EC of April 1996. These directives have been declared equivalent under the VEA.

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

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

- France uses ISO 6579 to analyze for *Salmonella*.
- France suspends an establishment's eligibility to export the first time it fails to meet a performance standard.

4. LEGAL BASIS FOR THE AUDIT

The audit was undertaken under the specific provisions of United States laws and regulations, in particular:

- The Federal Meat Inspection Act (21 U.S.C. 601 et seq.).
- The Federal Meat Inspection Regulations (9 CFR Parts 301 to end), which include the Pathogen Reduction/HACCP regulations.
- The Poultry Products Inspection Act (21 U.S.C. 451 et seq.) and
- The Poultry Products Inspection Regulations (9 CFR Part 381)

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

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

5. SUMMARY OF PREVIOUS AUDITS

Final audit reports are available on FSIS' website at www.fsis.usda.gov/ofotsc.

The following concerns arose as a result of the FSIS audit of France's inspection system conducted in April 2002:

- HACCP implementation deficiencies were found in 16 of the 18 establishments whose records were reviewed.
- SSOP implementation deficiencies were found in eight of the 18 establishments whose records were reviewed.
- Lighting was inadequate at inspection stations in three of the four slaughter establishments audited.
- Pest control was inadequate in four of the 11 establishments visited.
- Maintenance and/or cleaning of over-product equipment had been neglected in eight of the 11 establishments visited.

- Pre-operational cleaning of product-contact equipment was inadequate in five of the 11 establishments visited.
- Product-contact equipment was stored under insanitary conditions in four of the 11 establishments visited.
- In two of the four establishments in which they were required, statistical process control procedures had not been developed to evaluate the results of testing for generic *E. coli*.
- Some field inspection personnel in positions of responsibility for U.S.-listed establishments had not had formal HACCP training.

The following concerns arose as a result of the FSIS audit of France's inspection system conducted in October-November 2002:

- HACCP implementation deficiencies were found in two of the nine establishments whose records were audited. This was a repeat finding.
- SSOP implementation was deficient in two of the nine establishments whose records were audited. This was a repeat finding.
- Pest control was inadequate in two of the nine establishments audited on-site.
- Maintenance and cleaning of over-product equipment was neglected in one of the nine establishments audited on-site.
- Pre-operational cleaning of product-contact equipment was inadequate in one of the nine establishments audited on-site.
- Product-contact equipment was stored under insanitary conditions in two of the nine establishments audited on-site.
- In one of the two swine slaughter establishments whose generic *E. coli* testing programs were evaluated, statistical process control methods had not been developed, as required, to evaluate the results.

6. MAIN FINDINGS

6.1 Legislation

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

6.2 Government Oversight

6.2.1 CCA Control Systems

Mainland France is divided into 22 Regions, and these Regions are in turn divided into 96 departments (there are also four overseas departments). Each has a Director of Veterinary Services (*Directeur du Départementale Services Veterinaires*, or DDSV). Each of these Directors is a veterinarian, employed by the government, and is a sworn-in officer (as are all inspection staff); his/her testimonies have high value in court proceedings. Each Director has two deputies, one in charge of animal health and welfare, and the other in charge of food safety procedures from farm to table. The latter coordinates the inspection programs within the department regarding all the approved meat and poultry slaughter

and processing establishments therein. According to the volume of activity within the department, the deputy has other colleagues who work with him/her and report to him/her; these make up the Food Safety Service within the department. These are either veterinary officers or technical assistants with specific public health training. Larger departments are divided into districts, each of which is under the supervision of a Veterinary Officer.

There are nine Interregional Inspectors General (IIG's), each of whom oversees several of the 22 Regions. These individuals form an intermediate step in the chain of command between DGAL headquarters and the departments. A monthly coordination meeting between the IIG's and the DGAL Director General is held in Paris. The IIG's also organize meetings with the DDSVs in their assigned region. A new Directive was signed in late 2002 that will promote the DDSV in the capital city of each Region to the position of Regional Coordinator, with responsibility to coordinate the activities of the DDSVs in the Region. The IIGs perform in-depth reviews of department offices (each lasting an average of 3½ days), once every one or two years, to ensure that requirements transmitted by DGAL HQ are being implemented.

Each year, the Director of each department evaluates each slaughter and cutting establishment in the department, rating them on a scale of 1 to 4, 1 being the best rating. If an establishment receives an evaluation of 4, that establishment's ability to export product to the U.S. is suspended.

Within France's Department of Agriculture there is a special Standing Committee for Inspection Coordination that can dispatch a team of specialists consisting of members of the two General Councils, including Veterinary Public Health Inspectors and, if needed, economists and/or Public Works officials, into any region or department for special inspections and/or investigations.

6.2.2 Ultimate Control and Supervision

France has one standard of inspection in all red meat slaughter and poultry facilities, both domestic and export.

The process for initial establishment certification is as follows: when the management officials of an establishment wish to be certified by DGAL as eligible to export to the United States, the first step is to approach the DDSV for instructions on how to achieve compliance with the requirements. The DDSV then sends special inspectors to explain the requirements in detail and to assess the establishment's capability for achieving compliance. The management officials then work to implement the requirements. When they feel confident the process is complete, they notify the DDSV. (If this is to be the first establishment within a department to request certification for U.S. eligibility, the DDSV will consult experienced experts from DGAL headquarters and the Regional Coordinator, who is an authority on FSIS requirements.) The DDSV or his/her deputy in charge of food hygiene then conducts an in-depth, on-site audit of all aspects of the facilities, operations, and controls, and submits a report to the Subdirectorate for Food Hygiene, DGAL headquarters in Paris, to the appropriate division (slaughter, processing,

etc.). The report is reviewed by the Head Veterinary Inspector in Charge of Meat Establishments and, if all aspects of the contents of the report are in compliance with FSIS requirements, the establishment is granted certification for eligibility for export to the U.S., and FSIS is notified of the new certification. If there is any doubt as to the adequacy of the compliance, by anyone in the entire chain of command, the Regional Coordinator is consulted; he/she is an expert in export requirements, and is in charge of several departments.

New official inspection guidelines are issued by DGAL headquarters in Paris. These are provided by fax, e-mail, and intranet to the Directors of the regional offices (departments) and, through them, to the interested field personnel and, if appropriate, also to establishment and/or laboratory management officials. Under the current system, it is the responsibility of these Directors to delegate implementation instructions to the appropriate officials under their supervision, and to ensure their implementation.

Reviews of local level programs are performed by the Chief Veterinary Inspector from the DSV office and the Chief of the Subdivision for the Department.

6.2.3 Assignment of Competent, Qualified Inspectors

Each field inspection official is rated annually. Rating discussions are conducted yearly, providing an overall summary of all aspects of the employee's work, including behavior, punctuality, performance, attitude, respect for administrative procedures, availability, a sense of public service, initiative, and inter-collegial relationships. In the event that a supervisor notes a deficiency in an inspector's performance, it is documented. One copy goes to the inspection official whose performance was deficient; one form stays with the DSV Quality Assurance Manager in the regional office.

All inspectors and veterinarians receive basic training. Every year there is a schedule for continuing education for all inspection personnel. The auditor determined that some inspection personnel in the field had not received the necessary continuing education (details are provided later in this section).

No full- or part-time DGAL employees are permitted to perform any private, establishment-paid tasks at an establishment in which they perform official duties. There are provisions for private veterinarians to be hired under contract as part-time DGAL employees, mostly for *ante-mortem* inspection and, rarely, also for *post-mortem* inspection to fill in for temporary absences of normal inspection veterinarians, for example, for the full-time veterinarians who are in charge of two export slaughter facilities. These people are screened by the DSV prior to hire, and sign a contract binding them to a code of ethics that expressly prohibits any activities that may result in conflicts of interest. Violations of this code are cause for legal action and may result in expulsion from the profession by the equivalent of Veterinary Examining Boards.

Allocation of full-time personnel to work in establishments in which inspection is not permanent (processing facilities, cold stores) is the responsibility of the Deputy Director

in charge of Food Safety; the assignment of inspection personnel to those facilities requiring full-time coverage is performed by the DDSV in the department.

- In seven of the 10 establishments, there were deficiencies in inspection controls, involving one or more of the following:
 - Monitoring of establishment compliance (or lack of compliance),
 - Ensuring corrective actions are taken,
 - Post-mortem inspection, and
 - Pre-operational sanitation inspection.

- At the local levels, some inspectors and establishment personnel still have not had adequate HACCP training: in three of the establishments audited, the Inspectors/Veterinarians-In-Charge had had no HACCP training courses in more than six years, and in one of these, the Veterinarian-In-Charge had had no formal HACCP training since 1970.

6.2.4 Authority and Responsibility to Enforce the Laws

DGAL has the authority and the responsibility to enforce all U.S. requirements. A copy of the PR/HACCP regulations is present at each establishment certified for U.S. export. The internal reviewer uses this to evaluate the establishments' programs.

In some departments, there were written checklists that were being used by the supervisors of in-plant inspection personnel regarding the establishments' fulfillment of their responsibilities regarding HACCP programs. In others, a similar checklist was being developed. Checklists for SSOP implementation were also being developed.

In cases of major noncompliance, the Veterinarian-In-Charge has the authority to stop production, reject production lot(s) for specific use, reject insanitary equipment, and/or retain affected product. If the IIC finds conditions that indicate failure to meet basic FSIS requirements, he/she immediately reports to his Deputy DDSV. The latter reports to the DDSV (Director of VS), who has the authority to suspend eligibility. The DDSV reports more serious noncompliance to DGAL-headquarters. The CVO signs delistment orders.

If public health concerns arise as a result of supervisory visits, in-plant inspections, or upper level audits/reviews, production is stopped and all affected product is retained. DGAL is notified immediately by fax with all the pertinent details, in order to inform and to initiate recall local, national, or international procedures, if indicated. If an international recall is undertaken, the European Commission in Brussels is also notified. An inquiry into the causes of the event is initiated immediately. A rapid-alert system is also in place: in the event of a public-health alert, the information goes from the establishment directly to DGAL-headquarters and from there to all DDSVs, professional organizations for cattle, swine, and, as indicated, USDA and overseas customers.

6.2.5 Adequate Administrative and Technical Support

DGAL has the resources and ability to support a third-party audit and has adequate administrative and technical support to operate France's inspection system. However, a lack of staffing in one department resulted in the lack of monthly supervisory visits during most months during which there was U.S.-eligible production in the new establishment certified for U.S. export in 2002 (see Section 13.4 of this report).

6.3 Headquarters Audit

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

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

No concerns arose as a result of the examination of these documents. However, concerns arose regarding the implementation in the field of instructions issued by headquarters.

7. ESTABLISHMENT AUDITS

The FSIS auditor visited a total of 10 establishments—five slaughter-and-processing establishments and five processing establishments. Four establishments were delisted by France for failure to meet U.S. requirements. Two others received a Notification of Intent to Delist from DGAL that corrective actions must be implemented within 30 days because of deficiencies in the implementation of requirements for HACCP programs or SSOP. These establishments may retain their certification for export to the United States provided that they correct all deficiencies noted during the audit within 30 days of the date the establishment was audited.

At the time this audit was planned, 17 establishments were certified as eligible to export meat or poultry to the United States. Nine of these were selected at random for on-site reviews and one was added because of a Notice of Intent to Delist that was issued during the previous FSIS audit. One establishment voluntarily requested its removal from the

list of certified establishments prior to the audit. Another establishment was chosen at random to take its place.

8. RESIDUE AND MICROBIOLOGY LABORATORY AUDITS

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

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

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

The following laboratories were audited:

- The private laboratory in Establishment 29-225-01 (Jean Hénaff S.A.S.), in Pouldreuzic was conducting analyses of field samples for the presence of generic *Escherichia coli* (*E. coli*).
- The *Laboratoire Départemental Vétérinaire du Finistère*, in Quimper, a government laboratory, was conducting analyses of field samples for France's national residue control program and also analyses of field samples for the presence of *Salmonella*.

The findings in these laboratories are discussed in Section 11.3 (Testing for Generic *E. coli*), 12 (Residue Controls), and 13.2 (Testing for *Salmonella* species) of this report.

9. SANITATION CONTROLS

As stated earlier, the FSIS auditor focuses on five areas of risk to assess France's meat and poultry inspection system. The first of these risk areas that the FSIS auditor reviews is Sanitation Controls.

Based on the on-site audits of establishments, and except as noted below, France'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, and except as noted below, France's inspection system had controls in place for water potability records, chlorination procedures, back-siphonage prevention,

separation of operations, temperature control, work space, ventilation, ante-mortem facilities, welfare facilities, and outside premises.

9.1 SSOP

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOP were met, according to the criteria employed in the United States' domestic inspection program. The SSOP in the ten establishments audited were found to meet the basic FSIS regulatory requirements, with the following implementation deficiencies:

- In one establishment, there was practically no documentation of daily operational sanitation activities, findings, corrective actions, or preventive measures. This was a repeat finding in this establishment.
- In one establishment, condensation was obvious, heavy, dripping, and out of control in the main bacon cooler, directly above exposed product. No corrective actions were taken either by establishment or inspection personnel.
- In one establishment, the documentation of the recording of water temperatures in sanitizers on the slaughter floor during operations was audited. During the period between January 1 and March 31, 2003, *all* of the recorded temperatures, without exception, were well below the required 180°F (82°C). The temperatures recorded ranged down to 125°F (52°C). There was no documentation of any corrective actions taken, and apparently no corrective actions were taken, so that the slaughter operations were allowed to continue with non-compliant sterilizers. This documentation had not been reviewed by the inspection staff.
- In three establishments, there was daily documentation of both pre-operational and operational activities, but more detail was needed in the written descriptions of corrective actions and/or preventive measures.

9.2 EC Directive 64/433

In six establishments, the provisions of EC Directive 64/433 were effectively implemented. In the other four establishments, the deficiencies involved:

- Evidence of rodents inside an establishment,
- Inadequate pre-operational cleaning of equipment,
- Inadequate sanitizing of slaughter equipment,
- Inadequate hand-washing facilities,
- Insanitary storage of clean equipment, and
- Inadequate lighting at post-mortem inspection.

9.3 Other Sanitation Deficiencies

- In four establishments, corrective actions in response to serious condensation problems were either lacking, inadequate, or ineffective. In one other establishment, condensation was out of control.
- In three establishments, maintenance and cleaning of over-product equipment had been neglected. This was a repeat finding.
- In three establishments, pest control was inadequate: in one of these, rodent droppings were found, and in the other two, cobwebs were found in dry-storage areas.
- In two establishments, hand-washing facilities were inadequate to prevent contamination of product if employees' hands were contaminated in the course of their operations. This was a repeat finding.
- In two of the five slaughter establishments, cross-contamination of carcasses with equipment (splitting saw housings) was observed on slaughter floors.
- In two establishments, product was stored under insanitary conditions.
- In two establishments, cleaned product-contact equipment was stored under insanitary conditions.
- In three establishments, pre-operational cleaning of some product-contact equipment was inadequate.
- In two establishments, slaughter equipment was not adequately sanitized before each use.
- Personal hygiene deficiencies were observed in two establishments.
- Waste container lids in production areas in two establishments were hand-operated.
- In one establishment, the controls to document, correct, and prevent visible fecal contamination were inadequate. The zero-tolerance policy was not being adequately enforced as fecal contamination was observed on carcasses that had passed both establishment and inspection controls, and corrective actions taken as a result were not adequate.
- In one establishment, the facilities for sanitizing slaughter equipment were inadequate.
- In one establishment, water under high pressure was being used on equipment and on the floor near exposed product, and was being directed toward that exposed product.

- In one establishment, deteriorated equipment in need of repair or replacement was being used for exposed product.
- In one establishment, there was inadequate segregation of containers used for edible product and inedible materials.
- In one establishment, packaged product was being packed into dirty containers for shipping.

10. ANIMAL DISEASE CONTROLS

The second of the five risk areas that the FSIS auditor reviews is Animal Disease Controls. These controls include ensuring adequate animal identification, control over condemned and restricted product, and procedures for sanitary handling of returned and reconditioned product. The auditor determined that France's inspection system had adequate controls in place. No deficiencies were noted.

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

11. SLAUGHTER/PROCESSING CONTROLS

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

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

11.1 Humane Handling and Humane Slaughter

No deficiencies were noted regarding humane handling or humane slaughter.

11.2 HACCP Implementation

Each establishment approved to export meat and/or poultry products to the United States that conduct slaughter and/or processing operations is 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 audits of the 10 establishments. Three establishments had adequately implemented the PR/HACCP requirements. Deficiencies with HACCP implementation were found in seven establishments. In three of these seven establishments, there were deficiencies regarding basic HACCP

requirements (these were the three establishments that were delisted). The following deficiencies were identified:

- Verification procedures were inadequate in four establishments.
- Critical control points and/or critical limits were not adequately described in two establishments. This was a basic non-compliance.
- Monitoring procedures for critical limits procedures were inadequate in two establishments.
- In two establishments, some verification activities were described and performed, but more detail is needed.
- HACCP documentation in general was inadequate in one establishment.
- In one establishment, a pre-shipment document review form had not been developed, although critical limits and corrective actions were documented.
- In one establishment, rework product was not included in the flow chart and had not been considered in the hazard analysis. This was a basic non-compliance.
- In one establishment, there were illegible corrections in the log for monitoring CCPs.
- In one establishment, the HACCP plan had not been re-evaluated yearly as required.

11.3 Testing for Generic *E. coli*

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

Five of the 10 establishments audited were required to meet the basic FSIS regulatory requirements for testing for generic *E. coli* and were evaluated according to the criteria employed in the United States' domestic inspection program.

Testing for generic *E. coli* was conducted properly in two of the five slaughter establishments. In the other three establishments, the following deficiencies were found:

- ◆ In two establishments, statistical process control methods had not been developed, as required, to evaluate the results of testing for generic *E. coli*.
- In one establishment, the carcass selection for testing for generic *E. coli* was not random.

11.4 Testing for *Listeria monocytogenes*

In the four establishments producing ready-to-eat products, testing programs for the control of *Listeria monocytogenes* had been developed and implemented.

11.5 EC Directive 64/433

In three of the five slaughter establishments audited, the provisions of EC Directive 64/433 regarding slaughter controls were effectively implemented.

In the other two slaughter establishments, the following deficiencies in post-mortem inspection procedures were observed:

- In one establishment, numerous deficiencies were found:
 - Some carcasses were not being inspected,
 - Backs of carcasses were not observed,
 - Inspectors did not require viscera to be presented with all carcasses,
 - Plucks and viscera in un-split carcasses were not being inspected, and
 - Viscera presented on the line were not adequately observed.

- In one establishment, lymph nodes, plucks, and viscera were not being inspected adequately.

12. RESIDUE CONTROLS

The fourth of the five risk areas that the FSIS auditor reviews is Residue Controls.

All samples required in the 2002 national residue testing plan were taken and analyzed according to the plan. Sampling for the 2003 plan began in late April 2003.

12.1 FSIS Requirements

No deviations from other FSIS requirements were noted.

12.2 EC Directive 96/22

In the *Laboratoire Départemental Vétérinaire du Finistère*, in Quimper, the provisions of EC Directive 96/22 were effectively implemented.

12.3 EC Directive 96/23

In the *Laboratoire Départemental Vétérinaire du Finistère*, in Quimper, the provisions of EC Directive 96/23 were effectively implemented.

13. ENFORCEMENT CONTROLS

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

Inspectors-In-Charge have the authority to place on hold any products produced under conditions that are out of compliance with U.S. requirements. They report their findings

to the Director of Veterinary Services in the departments, who, in turn, has the authority to suspend production. On the basis of information provided by the Director of Veterinary Services, export certification can be withdrawn (an establishment delisted) by the Head of DGAL's Food Safety Subdirectorate. The following enforcement actions have been taken by DGAL since the last FSIS audit in October-November 2002:

One enforcement action was taken in a meat establishment in the Department of Vendée in November 2002: *Listeria monocytogenes* was found in a routine DGAL-initiated surveillance swab sample of a product-contact surface. The establishment also detected the problem at the same time during its independent environmental sampling program. All immediately affected product was condemned; all other possibly related product retained and sampled, and released after negative results; all product-contact surfaces were thoroughly cleaned and disinfected and re-tested; normal production was allowed to resume only after negative results.

All batches and lots of products eligible to enter the U.S.-export chain are checked by the inspection personnel, all documents pertaining to these products are reviewed, and no export certificates are signed during periods of an establishment's ineligibility for U.S. export. Also, all other establishments are informed immediately when eligibility of a supplying establishment is revoked or suspended. The auditor confirmed in the field that this system was in place.

13.1 Daily Inspection in Establishments

FSIS requires inspection coverage in all slaughter and processing establishments on days when U.S.-eligible production is conducted. The auditor verified that inspection coverage was provided and documented on such production days.

13.2 Testing for *Salmonella*

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

- France uses the ISO 6579 method to analyze for *Salmonella*.
- France suspends an establishment's eligibility to export the first time it fails to meet a performance standard.

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

Testing for *Salmonella* species was properly conducted in all three establishments.

13.3 Species Verification

At the time of this audit, France was required to test product for species verification. No deficiencies were noted.

13.4 Monthly Reviews

FSIS requires documented supervisory visits by a representative of the foreign inspection system, no less frequently than one such visit per month to each establishment certified, during periods when the establishment is engaged in producing products for exportation to the United States.

A yearly review is conducted of all the *Départements*, usually by the Directors of the Departments. In the U.S.-certified establishments, monthly reviews are conducted by the supervisors of the in-plant inspection personnel. Performance of field inspection personnel is also evaluated, but the results are not part of the routine monthly reports, and are not routinely documented.

If non-compliances are identified during the course of a routine monthly review, the inspection official responsible for the establishment has the primary responsibility for ensuring that corrective actions are effective within a defined period of time, according to the severity of the noncompliance; the monthly reviewers also follow up on the corrections. In serious cases, the central authority also would conduct follow-up procedures.

During this audit it was found that, in eight of the 10 establishments audited, monthly supervisory reviews of certified establishments had been performed and documented as required, during months in which U.S.-eligible production was conducted. In the other two establishments, the following deficiencies were found:

- In one establishment that had been certified as eligible for U.S. export for some 16 months, production of sausages for export to the U.S. was conducted during 10 of those months. The auditor determined, however, that internal supervisory reviews had been conducted only during four of those 10 months. Daily inspection coverage had been provided and documented, however, on U.S.-production days.
- In one other establishment, one monthly internal supervisory review had been missed.

13.5 Inspection System Controls

Except as otherwise noted below (and in Section 11.5 of this report), DGAL 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.

- In seven establishments, inspection personnel assigned to the establishments did not adequately document establishment compliance (or lack of compliance) with U.S. requirements.

- In four establishments, inspection personnel assigned to the establishments did not conduct any pre-operational sanitation inspection.
- In two establishments, problems previously identified by in-plant inspection staff and/or internal supervisory reviewers had not been adequately addressed and corrected.

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

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

14. CLOSING MEETING

A closing meeting was held on May 16, 2003, in Paris with the CCA. At this meeting, the primary findings, conclusions, and recommendations from the audit were presented by the auditor.

The CCA understood and accepted the findings.

Gary D. Bolstad, DVM
International Audit Staff Officer

A handwritten signature in black ink, appearing to read "G. D. Bolstad", written over a horizontal line.

15. ATTACHMENTS

Individual Foreign Laboratory Review Forms
Individual Foreign Establishment Audit Checklists
Foreign Country Response to Draft Final Audit Report

REVIEW DATE
 04-17-03

NAME OF FOREIGN LABORATORY
 FR. A-1a
 Laboratoire Départemental Vétérinaire du Finistère

FOREIGN COUNTRY LABORATORY REVIEW

FOREIGN GOV'T AGENCY
 Public laboratory, owned by the Conseil
 Général of the Département

CITY & COUNTRY
 Quimper, France

ADDRESS OF LABORATORY
 ZA de Créac'h Gwen - 22, Avenue de la Plage des
 Gueux, 29334 Quimper

NAME OF REVIEWER
 Dr. Gary D. Bolstad

NAME OF FOREIGN OFFICIAL
 Dr. Lilian Paech, DGAL Veterinary Official; Dr. Henri Peleton-Granier, Vet. Off.

Residue Code/Name			sal	chc	pcb	abc	cap	op	hm	des			
SAMPLING PROCEDURES	REVIEW ITEMS	ITEM #											
	Sample Handling	01	A	A	A	A	A	A	A	A	A		
	Sampling Frequency	02	A	A	A	A	A	A	A	A	A		
	Timely Analyses	03	A	A	A	A	A	A	A	A	A		
	Compositing Procedure	04	O	O	O	O	O	O	O	O	O		
	Interpret Comp Data	05	O	O	O	O	O	O	O	O	O		
Data Reporting	06	A	A	A	A	A	A	A	A	A			
ANALYTICAL PROCEDURES	Acceptable Method	07	A	A	A	A	A	A	A	A			
	Correct Tissue(s)	08	A	A	A	A	A	A	A	A			
	Equipment Operation	09	A	A	A	A	A	A	A	A			
	Instrument Printouts	10	O	A	A	O	A	A	A	A			
QUALITY ASSURANCE PROCEDURES	Minimum Detection Levels	11	O	A	A	A	A	A	A	A			
	Recovery Frequency	12	O	A	A	A	A	A	A	A			
	Percent Recovery	13	O	A	A	A	A	A	A	A			
	Check Sample Frequency	14	O	A	A	A	A	A	A	A			
	All analyst w/Check Samples	15	O	A	A	A	A	A	A	A			
	Corrective Actions	16	A	A	A	A	A	A	A	A	A		
	International Check Samples	17	O	A	A	A	A	A	A	A	A		
REVIEW	Corrected Prior Deficiencies	18	A	A	A	A	A	A	A	A			
OTHER REVIEW		19											
		20											

SIGNATURE OF REVIEWER

DATE

FOREIGN COUNTRY LABORATORY REVIEW <i>(Comment Sheet)</i>		REVIEW DATE 04-17-03	NAME OF FOREIGN LABORATORY Laboratoire Départemental Vétérinaire du Finistère	A-1b
FOREIGN GOV'T AGENCY Public laboratory, owned by the Conseil Général of the Département		CITY & COUNTRY Quimper, France	ADDRESS OF LABORATORY ZA de Créac'h Gwen - 22, Avenue de la Plage des Gueux, 29334 Quimper	
NAME OF REVIEWER Dr. Gary D. Bolstad		NAME OF FOREIGN OFFICIAL Dr. Lilian Puech, DGAL Veterinary Official; Dr. Henri Peleton-Granier, Vet. Off.		

RESIDUE	ITEM NO.	COMMENTS
		ABBREVIATIONS: sal = <i>Salmonella</i> species; chc = chlorinated hydrocarbons; abc = antibiotics; cap = chloramphenicol; op = organophosphate pesticides; hm = heavy metals; des = diethylstilbestrol
(All except Sal)	(02)	Sampling for 2003 is scheduled to begin in late April 2003. All samples for 2002 were taken and analyzed according to the 2002 national residue testing plan.
(Sal)	(07)	The method used to analyze for <i>Salmonella</i> species, EN-12824, is identical to the "older" ISO-6579, which has been recognized by FSIS as equivalent; only the name was changed. This method has been officially cancelled, however, in December 2002, because it has been updated to a newer, modified version of the ISO-6579 method. In accordance with European Commission guidelines, laboratories may continue to use the older method for six more months past the cancellation date. The newer, modified ISO-6579 method has been provided to FSIS for an equivalence determination.
(ABC, CAP)	(10)	Plate screening is performed in this laboratory for antibiotics and chloramphenicol; confirmation of positive screening samples is performed in the laboratory in Fougères.
NOTE: All previously identified deficiencies had been adequately addressed and corrected.		

04-23-2003

Jean Hénaff S.A.S., Est. 29-225-01

FOREIGN COUNTRY LABORATORY REVIEW

FOREIGN GOV'T AGENCY Private establishment; government oversight by DGAL	CITY & COUNTRY Pouldreuzic, France	ADDRESS OF LABORATORY 29710 Pouldreuzic
NAME OF REVIEWER Dr. Gary D. Bolstad	NAME OF FOREIGN OFFICIAL See reverse	

Residue Code/Name		Item #	Ecol																		
SAMPLING PROCEDURES	REVIEW ITEMS	ITEM #	EVALUATION CODE																		
	Sample Handling	01		A																	
	Sampling Frequency	02		A																	
	Timely Analyses	03		A																	
	Compositing Procedure	04		O																	
	Interpret Comp Data	05		O																	
Data Reporting	06	A																			
ANALYTICAL PROCEDURES	Acceptable Method	07	A																		
	Correct Tissue(s)	08	A																		
	Equipment Operation	09	A																		
	Instrument Printouts	10	O																		
QUALITY ASSURANCE PROCEDURES	Minimum Detection Levels	11	O																		
	Recovery Frequency	12	O																		
	Percent Recovery	13	O																		
	Check Sample Frequency	14	A																		
	All analyst w/Check Samples	15	O																		
	Corrective Actions	16	O																		
	International Check Samples	17	O																		
REVIEW	Corrected Prior Deficiencies	18	A																		
OTHER REVIEW		19																			
		20																			

FOREIGN COUNTRY LABORATORY REVIEW

(Comment Sheet)

REVIEW DATE

04-23-2003

NAME OF FOREIGN LABORATORY

Jean Hénaff S.A.S., Est. 29-225-01

A-26

FOREIGN GOV'T AGENCY

Private establishment; government oversight by DGAL

CITY & COUNTRY

Pouldreuzic, France

ADDRESS OF LABORATORY

29710 Pouldreuzic

NAME OF REVIEWER

Dr. Gary D. Bolstad

NAME OF FOREIGN OFFICIAL

See reverse

RESIDUE

ITEM NO.

COMMENTS

Note: No comments were necessary.

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Lampaul-Guimiliau Landivisiau	2. AUDIT DATE 04-22-2003	3. ESTABLISHMENT NO. 29-097-20	4. NAME OF COUNTRY France
5. NAME OF AUDITOR(S) Dr. Gary D. Bolstad		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> 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		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	O
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	O
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements		Part E - Other Requirements	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	X	38. Establishment Grounds and Pest Control	X
13. Daily records document item 10, 11 and 12 above.	X	39. Establishment Construction/Maintenance	X
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements		40. Light	
14. Developed and implemented a written HACCP plan.		41. Ventilation	X
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	X	42. Plumbing and Sewage	
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.		44. Dressing Rooms/Lavatories	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		45. Equipment and Utensils	X
18. Monitoring of HACCP plan.		46. Sanitary Operations	X
19. Verification and validation of HACCP plan.	X	47. Employee Hygiene	X
20. Corrective action written in HACCP plan.		48. Condemned Product Control	X
21. Reassessed adequacy of the HACCP plan.	X	Part F - Inspection Requirements	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
Part C - Economic / Wholesomeness		50. Daily Inspection Coverage	O
23. Labeling - Product Standards		51. Enforcement	X
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)		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	X
29. Records	O	57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions	O	59.	
31. Reassessment	O		
32. Written Assurance	O		

Est. 29-097-20, Lampaul-Guimiliau, Landivisiau, France - April 22, 2003. Operations: Pork processing; turkey packaging. U.S. exports: None so far.

- 12/46/51 Condensation was obvious, heavy, dripping, and out of control in the main bacon cooler, directly above exposed product.
No corrective actions were taken or attempted, either by establishment or inspection personnel.
- 13/51 There was practically no documentation of daily operational sanitation activities, findings, corrective actions, or preventive measures. This was a repeat finding.
- 15 Rework was not included in the flow chart or the hazard analysis.
- 19/51 There was no documentation of verification of the monitoring of the CCPs.
- 21/51 The HACCP plan had not been re-evaluated yearly (the last revision was April 2, 1990).
- 38/56 Rodent droppings were observed in a non-meat ingredient storage area and many cobwebs were seen in various sections of the carton-storage room.
- 39a Maintenance and cleaning of over-product structures had been grossly neglected in many areas. This deficiency had been identified by the DSVL internal auditor and had not been adequately addressed.
- 39b The housekeeping in one non-meat ingredient storage area had been grossly neglected.
- 41/46/51 Obvious, dripping condensation was out of control on extensive areas of the ceiling, directly over exposed product, in the main bacon cooler. No corrective actions were taken or even attempted during the audit. More over-product condensation was on the ceiling in the frozen-product receiving room; the DGAL internal auditor had given previous instructions to mark off hazardous areas; this had not been done.
- 45/56 Numerous instances of inadequate pre-operational cleaning of product-contact equipment, processing and packaging equipment, and product-transportation equipment were observed in many areas during the course of the audit. Non-meat ingredients were stored in dirty containers on old, dirty, uncleanable wooden pallets.
- 46a The foil covering of a container of meat was torn so that the exposed meat was directly below old, dirty, and deteriorating wooden pallets. Also, an uncovered container of meat was stored in a freezer with heavy snow collected on the ceiling.
- 46b Many broken, cracked, and uncleanable plastic pallets were being used for transportation of plastic-wrapped compressed hams; many cracked and broken plastic combo bins were being used for in-plant storage and transportation of edible product; and large combos of thawing meat were stacked; the feet of the upper containers had not been cleaned after being in contact with the floor before stacking. No effective corrective actions were taken during the audit.
- 46c In several areas, the foot- or knee-operated lid openers on waste containers were dysfunctional, so that the lids had to be opened by hand.
- 46d Unclean maintenance personnel's tool boxes were observed to be stored on production machinery together with machine control switches and daily documentation papers.
- 47 Personal hygiene deficiencies were observed on at least eight occasions.
- 48 In many areas, edible-product containers were used for inedible and/or condemned materials, but were not identified as such. Furthermore, the auditor determined that these containers were routinely re-used for edible product.
- 51a No pre-operational sanitation inspection activities were performed by the veterinarian in charge of this establishment.
- 51b The in-plant inspection staff did not adequately document establishment officials' compliance (or lack of compliance) with the requirements of SSOP and HACCP programs.

Note: The accompanying DGAL officials voluntarily removed this establishment from the list of establishments certified as eligible to export to the United States, effective as of the start of operations on the day of this audit. The FSIS auditor was in full agreement with this decision.

61. NAME OF AUDITOR

Garv D. Bolstad, DVM

62. AUDITOR SIGNATURE AND DATE



4/22/03

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Jean Hénaff S.A.S. 29710 Pouldreuzic O	2. AUDIT DATE 04-23-2003	3. ESTABLISHMENT NO. 29-225-01	4. NAME OF COUNTRY France
5. NAME OF AUDITOR(S) Dr. Gary D. Bolstad		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> 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			33. Scheduled Sample	
8. Records documenting implementation.			34. Species Testing	O
9. Signed and dated SSOP, by on-site or overall authority.			35. Residue	O
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements			Part E - Other Requirements	
10. Implementation of SSOP's, including monitoring of implementation.			36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.			37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.			38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.			39. Establishment Construction/Maintenance	X
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements			40. Light	X
14. Developed and implemented a written HACCP plan.			41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	X		42. Plumbing and Sewage	
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.			44. Dressing Rooms/Lavatories	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements			45. Equipment and Utensils	X
18. Monitoring of HACCP plan.	X		46. Sanitary Operations	X
19. Verification and validation of HACCP plan.	X		47. Employee Hygiene	X
20. Corrective action written in HACCP plan.			48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.			Part F - Inspection Requirements	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.			49. Government Staffing	
Part C - Economic / Wholesomeness			50. Daily Inspection Coverage	
23. Labeling - Product Standards			51. Enforcement	X
24. Labeling - Net Weights			52. Humane Handling	
25. General Labeling			53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)			54. Ante Mortem Inspection	
Part D - Sampling Generic E. coli Testing			55. Post Mortem Inspection	X
27. Written Procedures			Part G - Other Regulatory Oversight Requirements	
28. Sample Collection/Analysis	X		56. European Community Directives	X
29. Records			57. Monthly Review	X
Salmonella Performance Standards - Basic Requirements			58.	
30. Corrective Actions			59.	
31. Reassessment				
32. Written Assurance				

France - Est. 29-225-01; Jean Hénaff S.A.S., April 23, 2003. Operations: Swine slaughter, pork cutting, processing, and canning (paté). U.S. exports: Pork patés.

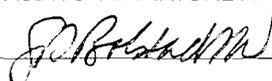
- 15/51 The number of carcasses to be monitored for the CCP for zero-tolerance for visible fecal contamination was not specified in the written HACCP plan. The critical limits for the CCP for zero-tolerance for visible fecal contamination were not defined. It was noted that the person responsible for the establishment's HACCP program had not had any HACCP training courses since her microbiology education some 12-13 years ago.
- 18/51 There was no formal monitoring of critical limits. Also, the incidence of visible fecal contamination at the pre-boning trim station was not documented.
- 19/51 There was no documentation of verification procedures.
- 28 The process for selection of carcasses for *E. coli* testing was not random (samples were always taken on Tuesdays).
- 39 Maintenance and cleaning of over-product structures in the re-inspection area and in other exposed-product areas (boning room, carcass cooler) had been seriously neglected.
- 39/46/51/56 No hand-soap dispensers were present at either post-mortem inspection or evisceration stations. This was a repeat finding. Operations were allowed to continue for another half-hour after this critical deficiency was identified, before a temporary soap dispenser was provided at the post-mortem inspection station.
- 40/51 Light was inadequate at inspection stations. Fifty foot-candles (fc), or 550 Lux, of shadow-free light is required. The auditor measured levels of 10 fc in abdominal cavities, 20 fc at mandibular lymph nodes, and 30 fc at viscera.
- 45 Pluck hooks and viscera trays were not adequately cleaned before each use. Lid-contact surfaces of canning machines, ready for use, and other parts of canning equipment, had not been adequately cleaned (old product residues were found).
- 46a Condensation was present above dressed carcasses and operators on the slaughter line; fluid was dripping from an overhead pipe directly onto plucks prior to the post-mortem inspection station. No corrective actions were taken. Also, fluid was dripping onto covered product and the splashing onto uncovered product in a cooler. Corrective actions were inadequate.
- 46b The power cord for the splitting saw routinely contacted each carcass in the splitting process; the housing of the splitting saw, which also contacted each carcass, was not sanitized after each use. These deficiencies resulted in obvious cross-contamination; no corrective actions were taken.
- 46c There was no drain hose on the splitting saw. Water routinely fell onto the splitter's platform and splashed onto the exposed carcasses being split. No corrective actions were taken.
- 46d Two carcasses in the retained cooler were in contact with the floor.
- 46/51 Fecal contamination was observed on two of ten carcasses inspected in the cooler. Corrective actions were inadequate (did not include re-inspection of other carcasses dressed prior to the contaminated ones).
- 47 Neither establishment nor DGAL officials washed their hands upon entering the slaughter floor. The employee who was instructed to trim fecal contamination observed on carcasses in the cooler did not wash his hands after contaminating them in the process, before continuing the trimming, thus contaminating more surfaces.
- 51a Inspection staff assigned to this establishment do not perform pre-operational sanitation inspection.
- 51b The veterinarian in charge of this establishment had had no HACCP instruction since an instruction course in the 1970s. No documentation of HACCP training for any of the inspection personnel was not available.
- 51c The in-plant inspection staff did not document establishment officials' compliance (or lack of compliance) with the requirements of SSOP and HACCP programs. The DSV internal reviewer had ordered the in-plant inspection staff to ensure that the CCP for evisceration was verified; this had not been done.
- 51d/57 There was no internal review in January 2003, although U.S.-eligible production was conducted.
- 55 Post-mortem inspection procedures were inadequate. The inspector incising lymph nodes was making only one small incision in each and not adequately observing the cut surfaces, and plucks and viscera were also not adequately inspected.

Note: After a discussion of the nature, extent, and degree of the deficiencies identified, the accompanying DGAL officials voluntarily removed this establishment from the list of establishments certified as eligible to export to the United States, effective as of the start of operations on the day of this audit. The FSIS auditor was in full agreement with this decision.

61. NAME OF AUDITOR

Gary D. Bolstad, DVM

62. AUDITOR SIGNATURE AND DATE


 4/23/03

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Ets. Cooperl Hunaudaye Bd de l'Abbaye - B.P. 96238 35162 Montfort-Sur-Meu Cedex	2. AUDIT DATE 04-24-2003	3. ESTABLISHMENT NO. 35-188-01	4. NAME OF COUNTRY France
5. NAME OF AUDITOR(S) Dr. Gary D. Bolstad		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> 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		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	O
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements		Part E - Other Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	X	36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	X
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements		40. Light	X
14. Developed and implemented a written HACCP plan.		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	X	42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.	X	43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		45. Equipment and Utensils	X
18. Monitoring of HACCP plan.	X	46. Sanitary Operations	X
19. Verification and validation of HACCP plan.	X	47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		Part F - Inspection Requirements	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	X	49. Government Staffing	
Part C - Economic / Wholesomeness		50. Daily inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	X
24. Labeling - Net Weights		52. Humane Handling	
25. General Labeling		53. Animal Identification	
26. Fir. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	
Part D - Sampling Generic E. coli Testing		55. Post Mortem Inspection	X
27. Written Procedures		Part G - Other Regulatory Oversight Requirements	
28. Sample Collection/Analysis	X	56. European Community Directives	X
29. Records		57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

France - Est. 35-188-01, April 24, 2003. Operations: Swine slaughter, pork boning, U.S. exports: None direct; supply Est. 87-065-01 and 87-085-03 for U.S.-eligible hams. Inspection staff: 1 Veterinarian in charge, 8 inspectors.

- 10/51 The documentation of the recording of water temperatures in sanitizers on the slaughter floor during operations was audited. During the period between January 1 through March 31, 2003, *all* of the recorded temperatures, without exception, were well below the required 180°F (82°C). The temperatures recorded ranged down to 125°F (52°C). There was no documentation of any corrective actions taken, and apparently no corrective actions were taken, so that the slaughter operations were allowed to continue on a routine basis with non-compliant sterilizers. This documentation had not been reviewed by the in-plant inspection staff.
- 15/51 The Critical Limits for zero tolerance of visible fecal contamination were defined only at the sternum and belly. When the auditor asked about other areas, the establishment official stated that fecal contamination in other areas would be identified and removed by the in-plant DGAL inspectors.
- 16/18/51 Monitoring was not specified in the HACCP plan; monitoring of the CCPs was not performed.
- 16/19/51 Verification of the monitoring of CCPS was neither specified in the HACCP plan nor performed.
- 22 No pre-shipment document review form had been prepared by the establishment officials for the eventuality that U.S.-eligible meat would be requested by a customer establishment, although critical limits and corrective actions were documented.
- 28/51 Samples for analysis for generic *E. coli* were taken using a swabbing method, but a statistical process control method of analyzing the results had not been developed as required. Samples were evaluated according to the criteria developed and intended only for use in excision samples.
- 39 There was no hot-water sanitizer at the dropped-meat reconditioning station.
- 39/46/56 There were no hand-soap dispensers at any of the post-mortem inspection stations. Operations were stopped until this could be corrected. There was no hand-wash station available to workers in the entire, large, wrapping/packaging area, without their having to go through a hinged door into a toilet/lavatory area. There was no hand-wash station at the dropped-meat reconditioning station. This was also a violation of EC requirements.
- 40/51 Light at post-mortem inspection stations was inadequate. Fifty foot-candles (fc), or 550 Lux, of shadow-free light is required. The auditor measured levels of 5 fc in abdominal cavities in the retained-carcass inspection room and 10 fc at the normal slaughter-line inspection station, 10 fc at mandibular lymph nodes on the line and 25 fc in the retained-carcass inspection room, and 45 fc at the on-line viscera inspection station.
- 45 Viscera trays were not adequately cleaned before being re-used.
- 5/46 The housing of the splitting saw, which contacted each carcass being split, was not sanitized before being re-used.
- 46a/51 Routine cross-contamination was observed in the retained-carcass room. As many as fifteen retained carcasses, some of which were obviously contaminated with grease, were allowed to be in full contact with each other, awaiting trimming and final inspection. No effort was made to stop the arrival of new carcasses, which were compounding the deficiency.
- 46b Neither establishment nor inspection personnel washed their boots adequately after leaving the ante-mortem pens before re-entering the production area of the establishment.
- 51 In-plant inspection staff does not conduct pre-operational sanitation inspection, nor do they generate any documentation regarding establishment compliance (or non-compliance) with the requirements for SSOP and HACCP programs, with the exception of placing a stamp on the document for the number of carcasses that fall on the floor.
- 55 The carcass inspector was not inspecting all carcasses: the FSIS auditor observed that, out of ten carcasses, three were not inspected. The backs of the carcasses were not being observed at all. The system for synchronization of viscera with corresponding carcasses was quite unreliable. Several sets of plucks were observed not to be inspected; if evisceration was poor, the butchers were observed to remove and discard plucks before presentation for post-mortem inspection. The post-mortem inspectors made no efforts to have missing viscera found. Plucks and viscera in un-split carcasses were observed *not* to be subjected to post-mortem inspection in the retained-carcass inspection area: carcasses were passed without inspection of plucks and viscera. The on-line post-mortem inspector was not adequately inspecting viscera.

The DGAL inspection officials determined that this establishment failed to meet U.S. requirements and voluntarily removed it from the list of establishments eligible to produce meat products eligible for export to the United States, effective as of the start of operations on the day of this audit. The FSIS auditor was in complete agreement with this decision.

61. NAME OF AUDITOR

Garv D. Bolstad, DVM

62. AUDITOR SIGNATURE AND DATE

 April 24, 2003

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Société Nouvelle Larnaudie, Figeac	2. AUDIT DATE 5/6/2003	3. ESTABLISHMENT NO. 46-102-04	4. NAME OF COUNTRY France
5. NAME OF AUDITOR(S) Dr. Gary D. Bolstad		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> 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		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	O
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements		Part E - Other Requirements	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		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.		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
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.		44. Dressing Rooms/Lavatories	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		Part F - Inspection Requirements	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		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

Est. 46-102-04: Société Nouvelle Lamaudie, Figeac, France; May 6, 2003. Operations: duck and goose liver foie gras and related products. Active U.S. exporter. One-three shifts, depending on the season (three October-December). Inspection coverage: One veterinarian at least once per month and on all days when there is U.S.-eligible production (there were three such days in 2002; none yet in 2003).

No comments were necessary.

61. NAME OF AUDITOR

Gary D. Bolstad, DVM

62. AUDITOR SIGNATURE AND DATE

Gary D. Bolstad May 6, 2003

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Capel la Quercynoise, Gramat	2. AUDIT DATE 05/05/2003	3. ESTABLISHMENT NO. 46-128-02	4. NAME OF COUNTRY France
5. NAME OF AUDITOR(S) Dr. Gary D. Bolstad		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> 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		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	O
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements		Part E - Other Requirements	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	O
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements		40. Light	X
14. Developed and implemented a written HACCP plan.		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
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.		44. Dressing Rooms/Lavatories	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	X
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		Part F - Inspection Requirements	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
Part C - Economic / Wholesomeness		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	X
24. Labeling - Net Weights		52. Humane Handling	
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	
Part D - Sampling Generic E. coli Testing		55. Post Mortem Inspection	
27. Written Procedures		Part G - Other Regulatory Oversight Requirements	
28. Sample Collection/Analysis		56. European Community Directives	
29. Records		57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions	O	59.	
31. Reassessment	O		
32. Written Assurance	O		

Est. 46-128-02, France, May 5, 2003. Operations: Duck (25,000 per week) and goose (800 per week) slaughter and cutting (and, not for U.S. export, canned products and fully-cooked, not shelf-stable duck and goose products). There are 3 shifts for operations: one for slaughter (1:30 a.m. – noon), one for cutting (7:00 a.m. – 2:00 p.m.), and one for shipping (8:00 a.m. to 6:00 p.m.); January – August 4 days per week, September – December 5 days per week. Inspection (circuit) coverage: 1 veterinarian on U.S. production days (once-twice per week); 1 full-time DGAL inspector (technical assistant) position has been advertised. U.S. exports: ready-to-cook duck and goose liver, duck breasts, and duck legs.

40 Light intensity of fifty foot-candles (equivalent to 550 Lux) is required at inspection surfaces. The FSIS auditor measured actual intensity of 45 foot-candles (495 lux) on the eviscerated inspection surfaces. The DGAL officials ordered the prompt installation of a new source of light on the same day as the audit.

46/51 Heavy condensation was present on the ceiling above the line in the final carcass washing area; the line was continuous from the hanging area and through the de-feathering area. The DGAL officials gave assurances that they would require the establishment to take steps to address and correct the problem in the immediate future.

61. NAME OF AUDITOR

Garv D. Bolstad, DVM

62. AUDITOR SIGNATURE AND DATE

 May 5, 2003

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Olympig Josselin	2. AUDIT DATE Apr. 25, 2003	3. ESTABLISHMENT NO. 56-091-01	4. NAME OF COUNTRY France
5. NAME OF AUDITOR(S) Dr. Gary D. Bolstad		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> 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		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	O
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements		Part E - Other Requirements	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	O
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	X	38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		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.		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
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.		44. Dressing Rooms/Lavatories	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		45. Equipment and Utensils	X
18. Monitoring of HACCP plan.		46. Sanitary Operations	X
19. Verification and validation of HACCP plan.	X	47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		Part F - Inspection Requirements	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
Part C - Economic / Wholesomeness		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	
24. Labeling - Net Weights		52. Humane Handling	
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	
Part D - Sampling Generic E. coli Testing		55. Post Mortem Inspection	
27. Written Procedures		Part G - Other Regulatory Oversight Requirements	
28. Sample Collection/Analysis		56. European Community Directives	
29. Records		57. Monthly Review	O
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

03-04-03

Est. 56-091-01 (Olympig), Josselin, France, April 25, 2003. Operations: Swine slaughter (42,000 per week), pork boning and slicing, two shifts, Monday-Friday. In-plant inspection staff: 2 veterinarians, 23 inspectors. This establishment has not yet exported any products to the U.S., but hopes to in the future. Product is sold to other establishments that use it for U.S. products.

- 12/45 (A) Varying amounts of grease were observed on carcasses, hams, and conveyor belts during the audit. (B) Following the afternoon work break, the hot water supply for the viscera trays had not been turned on. In all cases, the DGAL officials ordered immediate and effective corrective actions.
- 13 Daily documentation of some activities (e.g., handling of abscesses) was done, but more detailed descriptions of routine operational sanitation activities should be recorded.
- 46 Condensation problems over exposed product, workers, and personnel traffic areas were identified in several areas during the audit. In all cases, the DGAL officials ordered immediate and effective corrective actions.
- 19 Verification was included in the written HACCP plan: there was verification of calibration of equipment and supervisory observation of the monitoring procedure, but more detailed documentation of verification of monitoring procedures was needed.

NOTE: all the deficiencies identified during the previous FSIS audit of this establishment (October 30, 2002) had been adequately addressed and corrected, with the exception of condensation problems (which were, at that time, found only in a different area of the establishment, and were much more extensive than those found during this new audit).

61. NAME OF AUDITOR

Gary D. Bolstad, DVM

62. AUDITOR SIGNATURE AND DATE

 April 25, 2003

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Salaison Polette Teilheide, France	2. AUDIT DATE 05/12/2003	3. ESTABLISHMENT NO. 63-427-01	4. NAME OF COUNTRY France
5. NAME OF AUDITOR(S) Dr. Gary D. Bolstad		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> 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		33. Scheduled Sample	O
8. Records documenting implementation.		34. Species Testing	O
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	O
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements		Part E - Other Requirements	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.	X	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.		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
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.		44. Dressing Rooms/Lavatories	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		45. Equipment and Utensils	X
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.	X	47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		Part F - Inspection Requirements	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
Part C - Economic / Wholesomeness		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	X
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)		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		

France - Est. 63-427-01, May 12, 2003. Operations: dry sausage; two work shifts. US-certified since May 2002. U.S. exports: dry sausage.

13/51 Daily pre-operational and operational sanitation activities were documented, but documentation of corrective actions and preventive measures were frequently inadequate.

19 Verification was being performed; however, there was no description of verification procedures in the written HACCP plan, and documentation of the verification needed considerable improvement.

45 Several pieces of product-contact equipment were inadequately cleaned before the start of operations. The internal supervisor who was leading the audit identified the problems and ordered re-cleaning of the affected equipment.

51a There was U.S. production during ten months since the establishment was first approved for U.S. export; documented reports for internal supervisory reviews were present for only four of those months.

51b The Veterinarian-in-Charge was not documenting his checks of establishment compliance (or lack of compliance) with the requirements for SSOP and HACCP plans.

51c The Veterinarian-in-Charge had not performed any pre-operational inspection procedures since the establishment was certified as eligible to export to the U.S. approximately one year ago.

The internal supervisory reviewer who was leading the audit concluded that the HACCP and SSOP implementation deficiencies warranted the issuance of a Notice of Intent to Delist if corrective actions were not in place within 30 days of this audit. The FSIS auditor was in complete agreement with this decision.

61. NAME OF AUDITOR

Gary D. Bolstad, DVM

62. AUDITOR SIGNATURE AND DATE

 May 12, 2003

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Feyel Artzner, Schiltigheim (Strasbourg) French officials: Dr. Maryse Flamme, Dr. L. Repiquet-Bailleul, Dr. Vincent Spony (DSV), Dr. Thierry Kuhm' IIC	2. AUDIT DATE 04-16/2003	3. ESTABLISHMENT NO. 67-447-05	4. NAME OF COUNTRY France
5. NAME OF AUDITOR(S) Dr. Gary D. Bolstad		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> 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		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	O
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements		Part E - Other Requirements	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		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.		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
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.		44. Dressing Rooms/Lavatories	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		45. Equipment and Utensils	X
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		Part F - Inspection Requirements	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
Part C - Economic / Wholesomeness		50. Daily Inspection Coverage	O
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)		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		

France - Est. 67-447-05, April 16, 2003. Operations: Production of duck and goose foie gras and pork liver paté. U.S. exports: duck and goose foie gras and pork liver paté.

45 Two pieces of production equipment (foil package sealers) had not been dismantled for cleaning and bore old product residues close to packaging material contact surfaces. The DGAL internal reviewer ordered cleaning before use and daily dismantling for cleaning, as well as increased scrutiny during pre-operational sanitation inspection.

Note: the previously-identified deficiencies identified during the previous FSIS audit (in October 2002) had been satisfactorily addressed and corrected.

61. NAME OF AUDITOR

Garv D. Bolstad, DVM

62. AUDITOR SIGNATURE AND DATE

 April 16, 2003

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Rougié Bizac International Les Herbiers	2. AUDIT DATE 4/28/2003	3. ESTABLISHMENT NO. 85-109-01	4. NAME OF COUNTRY France
5. NAME OF AUDITOR(S) Dr. Gary D. Bolstad		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> 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			33. Scheduled Sample		
8. Records documenting implementation.			34. Species Testing		O
9. Signed and dated SSOP, by on-site or overall authority.			35. Residue		
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements			Part E - Other Requirements		
10. Implementation of SSOP's, including monitoring of implementation.			36. Export		
11. Maintenance and evaluation of the effectiveness of SSOP's.			37. Import		
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.			38. Establishment Grounds and Pest Control		
13. Daily records document item 10, 11 and 12 above.		X	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.			41. Ventilation		
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.			42. Plumbing and Sewage		
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.			44. Dressing Rooms/Lavatories		
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements			45. Equipment and Utensils		X
18. Monitoring of HACCP plan.			46. Sanitary Operations		X
19. Verification and validation of HACCP plan.			47. Employee Hygiene		
20. Corrective action written in HACCP plan.			48. Condemned Product Control		
21. Reassessed adequacy of the HACCP plan.			Part F - Inspection Requirements		
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		X	49. Government Staffing		
Part C - Economic / Wholesomeness			50. Daily Inspection Coverage		
23. Labeling - Product Standards			51. Enforcement		X
24. Labeling - Net Weights			52. Humane Handling		
25. General Labeling			53. Animal Identification		
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)			54. Ante Mortem Inspection		
Part D - Sampling Generic E. coli Testing			55. Post Mortem Inspection		
27. Written Procedures			Part G - Other Regulatory Oversight Requirements		
28. Sample Collection/Analysis		X	56. European Community Directives		
29. Records			57. Monthly Review		
Salmonella Performance Standards - Basic Requirements			58.		
30. Corrective Actions		O	59.		
31. Reassessment		O			
32. Written Assurance		O			

Est. 85-109-01, Rougié Bizac International, April 28, 2003. Operations: Duck and goose slaughter and cutting, 60,000 ducks per week and 600 geese before Christmas; one shift January – August, two shifts September – December. Exported to the U.S.: raw duck livers, raw goose livers, duck meat (*magret*). Inspection staffing: one full-time inspector (Inspector-In-Charge); a veterinarian supervises the inspection personnel in this establishment and three others; one.

13/51 Daily pre-operational and operational sanitation activities were documented, but details of the deficiencies, corrective actions, and preventive measures were often missing.

22 Zero-tolerance for visible fecal contamination at the evisceration station had been identified as a CCP during the previous FSIS audit. Due to a misunderstanding of discussions regarding the measurability of CCPs, it had been discontinued as a CCP. The FSIS auditor corrected this misunderstanding and the responsible official gave assurances it would be immediately reinstated as a CCP.

28/51 A statistical process control procedure had not been developed to evaluate the results of testing for generic *E. coli* as required for ducks; the m/M criteria for chickens was being employed. The misunderstanding was corrected immediately, and prompt correction was ordered by DGAL officials.

45 Wheeled trolleys used for containers of edible product were stacked after cleaning; some of the wheels and wheel support structures on the trolleys had not been adequately cleaned. The DGAL staff ordered a protective layer to be used between the trolleys and the edible containers. Implementation of the corrective action was not uniformly effective, but was implemented within a half-hour.

46 (A) Condensation was found over exposed product (on the slaughter line) and over personnel traffic areas in several areas. The DGAL officials ordered corrective actions immediately. (Note: far more severe condensation problems had been identified in a different area during the previous FSIS audit; this had been adequately addressed and corrected.) (B) Duck carcasses stored in a cooler were contacting deteriorated cement wall structures. The establishment management agreed to install cleanable coving on the affected structures. (C) Duck carcasses were observed to contact the hangers' stands on two occasions; the affected carcasses were diverted for pet food, the stands were moved, and stops were installed on the rails to prevent recurrence.

Note: The deficiencies identified during the previous FSIS audit had been corrected, but due to the deficiencies in the implementation of SSOP and HACCP requirements, the DGAL officials proposed issuing a Notice of Intent to Delist if corrective actions in response to the deficiencies identified were not in place and effective within 30 days. The FSIS auditor was in full agreement with this decision.

61. NAME OF AUDITOR

Garv D. Bolstad, DVM

62. AUDITOR SIGNATURE AND DATE

 April 28, 2003

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Madrang, Limoges	2. AUDIT DATE 4/30/2003	3. ESTABLISHMENT NO. 87-085-03	4. NAME OF COUNTRY France
5. NAME OF AUDITOR(S) Dr. Gary D. Bolstad		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> 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		33. Scheduled Sample	O
8. Records documenting implementation.		34. Species Testing	O
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	O
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements		Part E - Other Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	X	36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	X
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	X
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	X
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements		40. Light	
14. Developed and implemented a written HACCP plan.		41. Ventilation	X
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
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.		44. Dressing Rooms/Lavatories	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		45. Equipment and Utensils	X
18. Monitoring of HACCP plan.		46. Sanitary Operations	X
19. Verification and validation of HACCP plan.	X	47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		Part F - Inspection Requirements	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	X	49. Government Staffing	
Part C - Economic / Wholesomeness		50. Daily Inspection Coverage	O
23. Labeling - Product Standards		51. Enforcement	X
24. Labeling - Net Weights		52. Humane Handling	O
25. General Labeling		53. Animal Identification	O
26. Fin. Prod. Standards/Boneless (Defects/AQL/Park Skins/Moisture)		54. Ante Mortem Inspection	O
Part D - Sampling Generic E. coli Testing		55. Post Mortem Inspection	O
27. Written Procedures		Part G - Other Regulatory Oversight Requirements	
28. Sample Collection/Analysis		56. European Community Directives	X
29. Records		57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment:

13-04

France, Est. 87-085-03 (Madrange), April 30, 2003. Operations: Ham, pork, chicken, and duck liver paté, cooked pork sausage, head cheese; work shifts: one for ham, two for other production, three for cooking. Exported to the U.S.: Cooked ham, produced in Denmark, only when a specific order is received. Products produced at other times are not eligible for U.S. export. The last production for U.S. export was in November 2001. Inspection coverage: approximately one visit by the IIC every two months (no U.S.-eligible production since November 2002).

10/39 Heavy, dirty cobwebs and dust were observed in the carton-storage area.

19/51 Verification was documented for the CCP for metal detection but not for the CCP for cooking. During the previous FSIS audit (April 16, 2002), documentation of verification was not done for any CCPs. A document for this purpose was still being developed. This deficiency had also been identified by the internal supervisory reviewer during her last supervisory visit on March 24, 2003, and she had given instructions at that time that this was to be corrected immediately. This had not yet been done.

22 Several illegible corrections were found in recent documentation of the monitoring log for the CCP for cooking.

37 Livens from another establishment that had been accepted at receiving had been transported in unclean containers: obvious grease stains were observed on the containers.

38/39 Cobwebs and buildups of dust were present in the carton-storage area.

39/45 Maintenance and cleaning of over-product structures (including the hoist for tumbler lids, the rail on which it traveled, electrical equipment, pull-cords for opening doors between departments, and motor housings) had been neglected to various degrees in many production areas of the establishment; among the problems observed were rust, dust, grease, old product residues, and flaking paint.

41/46/51 Condensation was present on ceilings and/or overhead structures in the majority of the rooms in which exposed product was being processed. On numerous occasions, exposed product, partially-covered containers of product, inadequately covered product, and uncovered product were stored under condensation problem areas. During the course of the audit, the DGAL internal reviewer and leader of the audit ordered corrective actions, but in several cases these proved to be inadequate.

45/46/51/56 Ham molds that had been cleaned and were being used in production were routinely stored and brought into production areas in large, grossly unclean, deteriorated, and uncleanable plastic combo bins. This was a repeat finding from the previous FSIS audit in 2002. This deficiency had also been identified by the internal supervisory reviewer during her last supervisory visit on March 24, 2003, and she had given instructions at that time that this was to be corrected immediately. This had not yet been done. The audit team returned to the area later in the day, and the same conditions were again observed: no effective corrective actions had been taken. In another area, lids that had been cleaned and were ready for use for molds for other product were stored on unclean, rusty racks.

46a In one cooked-product slicing room, an employee was cleaning equipment with a high-pressure hose immediately adjacent to, and within several meters of a slicing production line with exposed product, and was observed to direct the water jet towards the exposed-product area.

46b Tables and containers used for production documents, labels, work gloves, etc. had buildups of dust, grease, and/or old product residues.

46c Very large trash containers with hand-operated lids were in use in the majority of the production areas. In one cooked-product room, the trash container was partially blocking the hand-wash station; in another cooked-product room, the trash container was completely blocking the hand-wash station.

46d Packaged product was being loaded for shipping into very dusty and dirty plastic containers.

Note: After a discussion of the nature, extent, and degree of the deficiencies identified, the accompanying DGAL officials voluntarily removed this establishment from the list of establishments certified as eligible to export to the United States, effective as of the start of operations on the day of this audit. The FSIS auditor was in full agreement with this decision.

61. NAME OF AUDITOR

Garv D. Bolstad, DVM

62. AUDITOR SIGNATURE AND DATE

 April 30, 2003

Liberté • Égalité • Fraternité
RÉPUBLIQUE FRANÇAISE

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DE L'ALIMENTATION, DE LA PÊCHE ET DES AFFAIRES RURALES

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RE: USDA Audit, January/February 2004
Comments on the draft report of the USDA audits,
April/May 2003

Paris,

Dear Mr. Director:

In a letter dated October 9, 2003 from Ms. Stratmoen to Mr. Checchi-Lang, it was proposed to the European Commission that an audit be conducted of the French inspection system of meat and poultry plants between January 14 and February 12, 2004. I am pleased to inform you that the proposed dates meet with my approval.

I am enclosing for you the list of plants that are currently certified to export to the USA as well as a contact list of veterinary services used for regular inspection of these plants.

In addition, regarding the draft report of the September 9, 2003 audit following the April 15-May 16, 2003 visit, I am including comments that I would like to see incorporated into the final report.

Review of Mission

As soon as I learned of the deficiencies identified during Dr. Bolstad's visit, which led to the immediate delisting of 4 plants, I developed an **action plan** that I sent to you by mail on May 6, 2003.

The main points of this plan included:

- Strengthening the role of the export coordinators who were charged with visiting all plants certified to export to the US before the end of June 2003;
- Providing more extensive training to inspectors and coordinators on US requirements;
 - A French official veterinarian was appointed national technical advisor. After having taken part in the internal training for FSIS international auditors, this individual was given responsibility for making return visits to all of the plants certified to export to the US in order to provide technical support to the inspectors, supervisors and coordinators.
 - I decided that training sessions should be organized for all inspectors;

These corrective actions that were decided upon even before Dr. Bolstad had finished his visit should be detailed in the final report.

Steps taken on the national level:

The following steps in communication and training of inspectors and supervisors were taken:

- Two national meetings were held with inspectors on June 13 and September 16, 2003. The deficiencies identified in the April/May 2003 audits were explained, particularly those having to do with plant operations or surveillance of plant operations by the inspection service:
 - SSOP
 - HACCP
 - Sampling and analysis procedures (for *E. coli* and *Salmonella*);
- Two memoranda were sent to the decentralized services to re-emphasize the regulations and confirm in writing the answers provided to the questions that arose at the June 13 and September 16 meetings (copies of these memos are attached);
- The managers (director and quality manager) of the plants certified by the US met September 22, 2003, to inform them of the conclusions from the April/May 2003 audits and also to emphasize and re-explain the American requirements;
- An inspection guide for plants processing meat products for export to the US was developed and disseminated to the inspectors;

Steps taken on the plant level:

All of the USDA-certified plants were visited once or more for review by the regional coordinator and the national technical advisor.

These visits were written up in detailed reports, which were sent to the producer and the food safety directorate.

The visits produced the following outcomes:

- If corrective actions needed to be taken, a follow-up inspection was arranged to ensure that these steps were taken,
- One plant, Amural (68-270-02), was delisted as it did not meet the required sanitary conditions.

As stated in the aforementioned action plan, inspector training sessions are in progress. They focus mainly on establishment of risk management systems by producers (HACCP) and their inspection by control services, as well as on the specifics of certification for export to the USA.

Corrective measures taken in the plants placed on conditional status during the April/May audits:

1. *Salaison Polette in 63460 Teilheide - certified (63-427-01)*

This plant was placed on conditional status after deficiencies were identified during the May 12, 2003 audit. A letter was delivered to this plant on May 15, 2003. An inspection visit occurred June 17, 2003 led by the supervisor with an export coordinator and the national technical advisor present, as well.

The deficiencies discovered in the audit were corrected; in addition, the following steps were taken:

- In accordance with the SSOP plan, inspection registration documents were arranged prior to resuming operations and during the workday with systematic supervisory monitoring conducted by the quality manager;
- The HACCP plan was updated and revisions were made to the effective CCP monitoring verification procedures;

As a result, this plant retained certification for export to the US.

2. *Rougié-Bizac International in 85500 Les Herbiers - certified (85-109-01):*

This plant was also placed on conditional certification status after deficiencies were identified during the April 28, 2003, audit.

A letter was delivered to the producer on April 29, 2003. The supervisor for the plant made an inspection visit on June 10, 2003, and the following improvements were noted:

- Corrective measures were taken regarding the presence of condensation above certain uncovered products;
- SSOP registration verification: follow-up on deficiencies, follow-up on corrective and preventative actions taken.
- Regarding the HACCP system, the CCPs were reviewed and documented appropriately.

This plant then received two inspection visits on June 26 and September 23, 2003 by the supervisor, the regional coordinator and the national technical advisor. These visits confirmed that the plant was in conformity for retaining certification.

An additional point requiring supplementary information from the FSIS:

Please confirm that the FSIS approves of the following analysis method used for identifying salmonella: the new version of ISO 6579.

Please accept the expression of my most sincere regards,