



United States
Department of
Agriculture

Food Safety
and Inspection
Service

Washington, D.C.
20250

JAN 14 2005

Dr. Peter W. de Leeuw
Chief Veterinary Officer
Ministry of Agriculture, Nature and Food Quality
Room 425
Post Office Box 20401
2500 EK The Hague
Netherlands

Dear Dr. de Leeuw:

The Food Safety and Inspection Service has completed an audit of the meat inspection system of the Netherlands. The audit was conducted from April 7 through May 6, 2004. Enclosed is a copy of the final audit report. Comments received from the Netherlands are included as an attachment to the audit report.

If you have any questions about this audit or need additional information, please contact me at 202-720-3781, facsimile 202-690-4040, or email at sally.white@fsis.usda.gov.

Sincerely,

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Sally White
Director
International Equivalence Staff
Office of International Affairs

Enclosure

Dr. Peter W. de Leeuw

cc:

Roger A. Wentzel, Counselor, U.S. Embassy, The Hague, The Netherlands
Wim Tacken, Agricultural Counselor, The Netherlands Embassy, Washington, D.C.
Tony van der Haegen, EU Mission to the US, Washington
Norval Francis, Minister/Counselor, US Mission to the EU, Brussels
Mr. Bernard Van Goethem, Acting Director, Directorate E, EC, Brussels
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Mary Stanley, Director, IID, OIA
Armia Tawadrous, Director, CPS, OIA
Anne Emshoff, IES, OIA
Steve McDermott, IES, OIA
Amy Winton, State Department
Country File-Netherlands (Audit April 04)

FINAL

NOV - 8 2004

FINAL REPORT OF AN AUDIT CARRIED OUT IN THE
NETHERLANDS COVERING THE NETHERLANDS' MEAT
INSPECTION SYSTEM

APRIL 7, 2004 THROUGH MAY 6, 2004

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 [National Inspection Service for Livestock and Meat (RVV)]
<i>E. coli</i>	<i>Escherichia coli</i>
FSIS	Food Safety and Inspection Service
KvW	Inspectorate for Health Protection and Veterinary Public Health
LRVV	National Inspection Service for Livestock and Meat Laboratory
PR/HACCP	Pathogen Reduction/Hazard Analysis and Critical Control Point Systems
RIKILT	Institute of Food Safety, Wageningen University Research Center
RVV	National Inspection Service for Livestock and Meat or Rijksdienst voor de keuring van Vee en Vless (RVV)
<i>Salmonella</i>	<i>Salmonella</i> species
SSOP	Sanitation Standard Operating Procedures
USDA	United States Department of Agriculture
VEA	European Community (EC)/United States Veterinary Equivalence Agreement
VIC	Veterinarian-in-Charge
VWA	The Food and Consumer Product Safety Authority or Voedsel-en Waren Autoriteit

1. INTRODUCTION

The audit took place in the Netherlands from April 7 through May 6, 2004.

An opening meeting was held on April 7, 2004, in The Hague with the Central Competent Authority (CCA). At this meeting, the auditor confirmed the objective and scope of the audit, the auditor's itinerary, and requested additional information needed to complete the audit of the Netherlands meat inspection system.

The auditor was accompanied during the entire audit by representatives from the CCA, the National Inspection Service for Livestock and Meat (RVV), and/or representatives from the regional and local inspection offices.

2. OBJECTIVE OF THE AUDIT

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

In pursuit of the objective, the following sites were visited: the headquarters of the CCA, two regional inspection offices, one district office, two laboratories performing microbiology and/or residue analytical testing on United States-destined product, four swine slaughter establishments, four meat processing establishments and one cold storage facility.

Competent Authority Visits			Comments
Competent Authority	Central	1	RVV Headquarters
	Regional	2	Northern Region and Eastern Region
	District	1	Doetichem District
Laboratories		2	
Meat Slaughter Establishments		4	
Meat Processing Establishments		4	
Cold Storage Facility		1	

3. PROTOCOL

This on-site audit was conducted in four parts. One part involved visits with CCA officials to discuss oversight programs and practices, including enforcement activities. The second part involved an audit of a selection of records in the country's inspection headquarters or regional offices. The third part involved on-site visits to nine establishments: four slaughter establishments, four processing establishments, and one cold storage facility. The fourth part involved visits to two microbiology and residue laboratories. Both laboratories were conducting analyses of field samples for the presence of generic

Escherichia coli (*E. coli*) and *Salmonella*. Both laboratories were also conducting analyses of field samples for the Netherlands national residue control program.

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

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

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

Third, the auditor would audit against any equivalence determinations that have been made by FSIS for the Netherlands under provisions of the Sanitary/Phytosanitary Agreement. Accordingly, FSIS has made an equivalence determination regarding the use of the ISO Method 6579 for *Salmonella* as well as testing for the presence of *Enterobacteriaceae* in lieu of generic *E. coli*.

4. LEGAL BASIS FOR THE AUDIT

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

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

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

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

5. SUMMARY OF PREVIOUS AUDITS

Final audit reports are available on FSIS' website at the following address:
http://199.140.65.44/regulations_&_policies/Foreign_Audit_Reports/index.asp

In the FSIS audit of the Netherlands in February 2003, the following findings were observed:

- Continuing problems with SSOP and HACCP implementation.
- Incomplete monthly supervisory reviews.
- Non-FSIS approved *Salmonella* testing method (VIDAS).
- Inadequate laboratory quality control procedures (residue laboratory).
- Inadequate enforcement by CCA in establishments.
- Of the 10 establishments reviewed, one received a NOID.

In the FSIS audit of the Netherlands in September 2003, improvements were noted. However, the following findings were observed:

- Non-FSIS approved laboratory testing method for *Salmonella* (VIDAS SLM).
- Species verification did not include testing for the presence of beef.
- Inadequate post mortem inspection procedures (mesenteric lymph nodes were not palpated).

6. MAIN FINDINGS

6.1 Legislation

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

6.2 Government Oversight

The Food and Consumer Product Safety Authority (VWA) is an independent agency under full ministerial responsibility of the Minister of Agriculture, Nature, and Food Quality. The VWA has two operating units:

- 1) Inspectorate for Health Protection and Veterinary Public Health (KvW)

2) National Inspection Service for Livestock and Meat (RVV)

The RVV has the organizational structure and staffing to ensure uniform implementation of U.S. requirements in those establishments certified to export meat to the United States of America. RVV is responsible for directing, planning, and developing meat inspection system in the Netherlands as well as oversight and enforcement of the FSIS regulatory requirements. RVV has a staff of approximately 1,320 personnel to carry out its meat inspection activities. All RVV inspection personnel assigned to establishments certified to export meat to the United States are government employees receiving no remunerations from either industry groups or establishment personnel.

6.2.1 CCA Control Systems

The RVV regulatory oversight of its meat inspection program consists of four levels: central, regional, district, and team. RVV provides direct oversight of four regional offices, which provide oversight of fourteen district offices. The district offices manage 47 teams with each team being supervised by a Team Leader who has responsibility of two or more establishments. The Team Leader supervises two or more veterinarians-in-charge, other full time RVV veterinarians, part-time veterinarians (practitioners), full-time RVV meat inspectors, and part-time assistant meat inspectors.

6.2.2 Ultimate Control and Supervision

The RVV has the legal authority to supervise and enforce the Netherlands' meat inspection activities through its linear government oversight, i.e., headquarters to regions to districts to Team Leaders.

The in-plant inspection personnel are supervised by the veterinarian-in-charge (VIC) who has the authority to suspend the establishment's production operation any time the wholesomeness and safety of the product are jeopardized. VIC reports directly to the Team Leader who performs the monthly internal reviews of the establishments certified as eligible to produce products for export to the United States. Team Leaders carry the responsibility to evaluate and report on the performance of the in-plant inspection personnel.

6.2.3 Assignment of Competent, Qualified Inspectors

Veterinarians, senior meat inspectors, and assistant meat inspectors possess the required educational degree necessary to meet minimum qualifications set by RVV. These inspection personnel have participated in the introductory training courses (six months for veterinarians and four months for meat inspectors) as well as on-the-job training under the supervision of the experienced veterinarians. Continual training is provided for all inspection personnel as needed. The regional offices maintain individual training records of inspection personnel. Based on these records, all official veterinarians and meat inspectors assigned to the U.S. approved establishments are PR/HACCP trained.

6.2.4 Authority and Responsibility to Enforce the Laws

The RVV has the authority for carrying out the Netherlands' meat inspection program including oversight and enforcement of the FSIS regulatory requirements in establishments certified to export to the United States. RVV not only has the authority to approve establishments for export to the United States, but also has the responsibility for withdrawing such approval when establishments do not meet FSIS requirements. Through the legal process in the courts, RVV, with the assistance of the Netherlands' enforcement agency (De Algemene Inspectiedienst), has the authority to prosecute meat establishments and withdraw official inspection.

6.2.5 Adequate Administrative and Technical Support

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

6.3 Headquarters Audit

The auditor conducted a review of inspection system documents at headquarters, two regions, one district, and all in-plant inspection offices at the audited establishments. 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.
- 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 inedible and condemned materials.
- Export product inspection and control including export certificates.
- Enforcement actions.

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

6.3.1 Audit of Regional and Local Inspection Sites

The FSIS auditor reviewed the Netherlands' meat inspection records and held interviews with the RVV inspection officials at the two regional offices and one district office indicated below:

- Regional North (Kring Noord) in Hoogeveen, Mr. H.H.G. Kocks, Regional Director
- Regional East (Kring Oost) in Arnhem, Dr. C.A.H. De Waal, Regional Director
- District Office at Doetinchem, Dr. M. Kocovic, District Manager

The purpose of the interviews was to examine the meat inspection records and determine the degree of government oversight and control provided by the regional and district offices

relative to the establishments certified to export to the United States. No concerns arose as a result of this review.

7. ESTABLISHMENT AUDITS

The FSIS auditor visited a total of nine establishments. Four were slaughter establishments, four were processing establishments, and one was a cold storage facility. None of the nine establishments were delisted or received a Notice of Intent to Delist (NOID) from the RVV.

Specific deficiencies are noted on the attached individual establishment reports.

8. RESIDUE AND MICROBIOLOGY LABORATORY AUDITS

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

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

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

The following laboratories were reviewed:

- The National Inspection Service for Livestock and Meat Laboratory (LRVV) is a government laboratory located in Wageningen. It has five research departments as follows:
 - 1) Microbiology
 - 2) Beta-agonists
 - 3) Veterinary drugs
 - 4) Hormones
 - 5) Trichinella
- The Institute of Food Safety (RIKILT), Wageningen University, is the independent research body that monitors the safety and quality of food in the Netherlands. RIKILT carries out legal and research tasks on behalf of the Dutch Ministry of Agriculture, Nature Management and Fisheries. It conducts monitoring of residues and contaminants, veterinary drugs, microbiology, and pesticides analysis.

No deficiencies were noted.

9. SANITATION CONTROLS

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

Based on the on-site audits of establishments, the Netherlands' inspection system had controls in place for SSOP programs, all aspects of facility and equipment sanitation, the prevention of actual or potential instances of product cross-contamination, good personal hygiene and practices, and good product handling and storage practices.

In addition, the Netherlands' 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 nine establishments audited were found to meet the basic FSIS regulatory requirements, with the following deficiencies:

- In one establishment, beaded condensation from the overhead structures was observed dripping onto exposed swine carcasses in the cooler.
- In two establishments, swine carcasses with dressing defects were in direct contact with each other on the trim line.
- In two establishments, records did not document all three parts of the corrective actions (especially to prevent recurrence) for SSOP deficiencies.
- In two establishments, production line employees did not remove or change their working clothing before or after using restrooms and/or lunch/break room facilities.
- In one establishment:
 - 1) Neck and jowls of the contaminated hog carcasses on the trim line were contacting employees' work platform and boots in the slaughter room.
 - 2) The trim room's sanitizer was not suitable in size or design to adequately sanitize some of the hand tools (a small circular saw and a hand saw) being used for trimming contaminated carcasses.

9.2 EC Directive 64/433

In six establishments, the provisions of EC Directive 64/433 were not effectively implemented and some deficiencies were noted. Problems were noted in the areas of construction, maintenance, sanitation of equipment and utensils, and employee hygiene. Specific deficiencies are noted in the attached individual establishment reports.

10. ANIMAL DISEASE CONTROLS

The second of the five risk areas that the FSIS auditor reviewed was Animal Disease Controls. These controls include ensuring adequate animal identification, control over condemned and restricted product, and procedures for sanitary handling of returned and reconditioned product. The auditor determined that the Netherlands' 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 reviewed was Slaughter/Processing Controls. The controls include the following areas: ante-mortem inspection procedures, ante-mortem disposition, humane handling and humane slaughter, post-mortem inspection procedures, post-mortem disposition, ingredients identification, control of restricted ingredients, formulations, processing schedules, equipment and records, and processing controls of cured, dried, and cooked products.

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

11.1 Humane Handling and Humane Slaughter

No deficiencies were noted.

11.2 HACCP Implementation

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

The HACCP programs were reviewed during the on-site audits of the eight establishments (one of the nine establishments audited was a cold storage facility). Three establishments had adequately implemented the HACCP requirements while five establishments did not fully meet HACCP implementation requirements.

- In five establishments, HACCP records did not include time and/or initial for each entry.
- In one establishment, verification records did not identify the type of verification procedures (direct observation of monitor, review of the records, or calibration of process-monitoring instruments) performed by the responsible establishment employee.

11.3 Testing for Generic *E. coli*

The Netherlands is using an *Enterobacteriaceae* testing program that has been determined to be equivalent to the FSIS regulatory requirements for generic *E. coli* testing.

Four of the nine establishments audited were required to meet the equivalent of 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 and the alternative procedures submitted by the CCA and determined equivalent by FSIS.

The alternative equivalent sanitary measures involve using *Enterobacteriaceae* instead of generic *E. coli* as an indicator organism, sampling based on a testing frequency of ten tests per week rather than based on production, sampling swine from the flank, brisket, rump, and back rather than the ham, belly, and jowl, and using the cork-borer method of sample collection rather than the sponge or excision method.

Equivalent generic *E. coli* testing (i.e., *Enterobacteriaceae*) was properly conducted in the four slaughter establishments.

11.4 Testing for *Listeria monocytogenes*

Two of the nine establishments audited were producing ready-to-eat products for export to the United States. These two certified establishments were canning facilities and were producing commercially sterile pork products (i.e., canned hams, canned luncheon meat, and canned cocktail sausages). *Listeria* testing is not required by FSIS for these types of ready-to-eat products.

11.5 EC Directive 64/433

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

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

12. RESIDUE CONTROLS

The fourth of the five risk areas that the FSIS auditor reviewed was Residue Controls. These controls include sample handling and frequency, timely analysis, data reporting, tissue matrices for analysis, equipment operation and printouts, minimum detection levels, recovery frequency, percent recoveries, and corrective actions.

No deficiencies were noted in either RIKILT or LRVV laboratories.

The Netherlands' National Residue Control Program for 2004 was being followed and was on schedule.

12.1 EC Directive 96/22

In both laboratories audited, the provisions of EC Directive 96/22 were effectively implemented.

12.2 EC Directive 96/23

In both laboratories audited, the provisions of EC Directive 96/23 were effectively implemented.

13. ENFORCEMENT CONTROLS

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

13.1 Daily Inspection in Establishments

Inspection was being conducted daily in all establishments.

13.2 Testing for *Salmonella*

The Netherlands has adopted the FSIS requirements for testing for *Salmonella* with the exception of the following equivalent measures.

- The Netherlands uses a continuous, on-going sampling program to determine when to initiate additional *Salmonella* testing.
- The Netherlands uses the swab protocol for sampling. Samples are composited and the entire composite is analyzed.
- The Netherlands's equivalence request to use the VIDAS SLM method is still under consideration by FSIS.

Four of the nine 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.

Salmonella testing was properly conducted in all four of the certified slaughter establishments.

13.3 Species Verification

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

13.4 Monthly Reviews

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

13.5 Inspection System Controls

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

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

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

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

14. CLOSING MEETING

A closing meeting was held on May 6, 2004, in The Hague with the CCA. At this meeting, the primary findings and conclusions from the audit were presented by the auditor.

The CCA understood and accepted the findings.

Dr. Nader Memarian
International Audit Staff Officer



15. ATTACHMENTS TO THE AUDIT REPORT

Individual Foreign Establishment Audit Forms

Individual Foreign Laboratory Audit Forms

Foreign Country Response to Draft Final Audit Report

REVIEW DATE
04/28/2004

NAME OF FOREIGN LABORATORY
RIKILT - Institute of Food Safety

FOREIGN COUNTRY LABORATORY REVIEW

FOREIGN GOVT AGENCY
Wageningen University (WUR)
Research Center

CITY & COUNTRY
Wageningen, The Netherlands

ADDRESS OF LABORATORY
Building No. 123 - Bomssteeg 45
P.O. Box 230, 6700 AE Wageningen, The Netherlands

NAME OF REVIEWER
Dr. Nader Memarian

NAME OF FOREIGN OFFICIAL
Mr. A. H. Roos, Dept. of Quality Control

Residue Code/Name	ITEM #	EVALUATION CODE					
		100	111	300	400	500	600
SAMPLING PROCEDURES	REVIEW ITEMS	A	A	A	A	A	A
	Sample Handling	A	A	A	A	A	A
	Sample Frequency	A	A	A	A	A	A
	Timely Analysis	A	A	A	A	A	A
	Compositing Procedure	O	O	O	O	O	O
	Interpret Comp Data	O	O	O	O	O	O
Data Reporting	06	A	A	A	A	A	A
ANALYTICAL PROCEDURES	Acceptable Method	A	A	A	A	A	A
	Correct Tissue(s)	A	A	A	A	A	A
	Equipment Operation	A	A	A	A	A	A
	Instrument Pinpoints	10	A	A	A	A	A
	Minimum Detection Levels	11	A	A	A	A	A
	Recovery Frequency	12	A	A	A	A	A
	Percent Recovery	13	A	A	A	A	A
	Check Sample Frequency	14	A	A	A	A	A
	All Analyst W/Check Samples	15	A	A	A	A	A
	Corrective Actions	16	A	A	A	A	A
REVIEW	International Check Samples	17	A	A	A	A	A
	Corrected Prior Deficiencies	18	O	O	O	O	O
OTHER REVIEW		19					
		20					

Signature of Reviewer *Nader Memarian* Date *04-28-04*

FOREIGN COUNTRY LABORATORY REVIEW

REVIEW DATE
 04/22/2004

NAME OF FOREIGN LABORATORY
 National Inspection Service for Livestock and Meat Laboratory
 (LRVV)

FOREIGN GOVT AGENCY
 National Inspection Service for
 Livestock and Meat

CITY & COUNTRY
 Wageningen, The Netherlands

ADDRESS OF LABORATORY
 41 Bomssteeg, Building No. 125
 P.O.Box 144, 6700 AC Wageningen, The Netherlands

NAME OF REVIEWER
 Dr. Nader Memarian

NAME OF FOREIGN OFFICIAL
 Mr. H. J. Keukens, Head of the Laboratory

Residue Code/Name			200	203	500	800	923	Sal	Ent b						
SAMPLING PROCEDURES	REVIEW ITEMS Sample Handling	ITEM # 01	A	A	A	A	A	A	A						
	Sample Frequency	02	A	A	A	A	A	A	A						
	Timely Analysis	03	A	A	A	A	A	A	A						
	Compositing Procedure	04	O	O	O	O	O	O	O						
	Interpret Comp Data	05	O	O	O	O	O	O	O						
	Data Reporting	06	A	A	A	A	A	A	A	A					
ANALYTICAL PROCEDURES	Acceptable Method	07	A	A	A	A	A	A	A						
	Correct Tissue(s)	08	A	A	A	A	A	A	A						
	Equipment Operation	09	A	A	A	A	A	A	A						
	Instrument Printouts	10	A	A	A	A	A	O	O						
QUALITY ASSURANCE PROCEDURES	Minimum Detection Levels	11	O	O	A	A	A	O	O						
	Recovery Frequency	12	O	O	A	A	A	O	O						
	Percent Recovery	13	O	O	A	A	A	O	O						
	Check Sample Frequency	14	A	A	A	A	A	A	A						
	All Analyst W/Check Samples	15	A	A	A	A	A	A	A						
	Corrective Actions	16	A	A	A	A	A	A	A						
	International Check Samples	17	O	O	O	O	O	O	O						
REVIEW	Corrected Prior Deficiencies	18	O	O	O	O	O	O	O						
OTHER REVIEW		19													
		20													

Signature of reviewer *Nader Memarian*

Date 04-22-04

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Zwanenberg Food Group B.V. Westdorplaan 225 8101 PN, Raalte	2. AUDIT DATE 04/20/2004	3. ESTABLISHMENT NO. NL-153-EEG	4. NAME OF COUNTRY The Netherlands
5. NAME OF AUDITOR(S) Dr. Nader Memarian		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	
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.	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	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		

60. Observation of the Establishment

Establishment NL-153-EEG

Audit Date: 04/20/2004

Processing / Canning

22.51 Verification records did not include an initial for each entry by the responsible establishment employee {9CFR part 417.5(b)}.

61. NAME OF AUDITOR

Nader Memarian, DVM

62. AUDITOR SIGNATURE AND DATE

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Dumeco Lichtenvoorde B.V. Stationstraat 16 7137 MX Lievelede	2. AUDIT DATE 04/16/2004	3. ESTABLISHMENT NO NL-060-EEG	4. NAME OF COUNTRY The Netherlands
5. NAME OF AUDITOR(S) Dr. Nader Memarian		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	
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	
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.	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	X
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

Establishment NL-060-EEG

Audit Date: 04.16.2004

Slaughter/ Processing

- 10 Beaded condensation from the over head structures was observed dripping onto exposed swine carcasses in the cooler (9 CFR part 416.13). Establishment took appropriate corrective actions to comply with regulation 416.15.
- 22/51 Some of the verification records did not include time and initial by the responsible establishment employee for each entry {9CFR part 417.5(b)}.
- 55,56/51 The submaxillary lymph nodes were not incised/examined by the responsible meat inspector(s). The RVV veterinarian took immediate corrective actions. No product will export to the U.S. from today's production. Council Directive 64/433/EEC of June 26, 1964, Annex 1, Chapter VI 25(b) was not met.

61. NAME OF AUDITOR

Nader Memarian, DVM

62. AUDITOR SIGNATURE AND DATE



04-16-04

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Dumeco Scherpenzeel B.V. Zwarte Land 13, 3925 CK Scherpenzeel	2. AUDIT DATE 04/14/2004	3. ESTABLISHMENT NO. NL-082-EEG	4. NAME OF COUNTRY The Netherlands
5. NAME OF AUDITOR(S) Dr. Nader Memarian		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	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		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.	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	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 <i>E. coli</i> 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

Establishment NL-082-EEG

Audit Date: 04.14.2004

Processing

22/51 HACCP monitoring and verification records did not include initial for each entry {9CFR part 417.5(b)}.

47/51 Production line employees did not remove or change their working clothing before or after using restrooms and/or lunch/break room facilities {9CFR part 416.5(a)}.

61. NAME OF AUDITOR

Nader Memarian. DVM

62. AUDITOR SIGNATURE AND DATE



04/14/04

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Dumeco Beuningen B.V. Zilverwerf 8 6641 TD beuningen	2. AUDIT DATE 04/26/2004	3. ESTABLISHMENT NO. NL-124-BEG	4. NAME OF COUNTRY The Netherlands
5. NAME OF AUDITOR(S) Dr. Nader Memarian		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	
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.	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	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		

60. Observation of the Establishment

Establishment NL-124-EEG

Audit Date: 04 26 2004

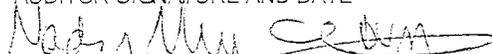
Processing

22.51 Some of the monitoring records did not include time and initial by the responsible establishment employee for each entry {9CFR part 417.5(b)}.

61. NAME OF AUDITOR

Nader Memarian, DVM

62. AUDITOR SIGNATURE AND DATE



04-26-04

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Zwanenberg Food Group B.V. Sluisweg 7, 7602 PR Almelo	2. AUDIT DATE 04/29/2004	3. ESTABLISHMENT NO. NL-129-EEG	4. NAME OF COUNTRY The Netherlands
5. NAME OF AUDITOR(S) Dr. Nader Memarian		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.		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	
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.		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	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		

60. Observation of the Establishment

Establishment NL-129-EEG

Audit Date: 04/29/2004

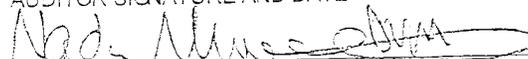
Processing : Caning

- 13/51 The establishment records did not document all three parts of the corrective actions (especially to prevent recurrence) for SSOP deficiencies (9CFR part 416.15).
- 22/51 A) Verification records did not include initial by the responsible establishment employee for each entry {9CFR part 417.5 (b)}.
- B) Verification records did not identify the type of verification procedures (direct observation of monitor, review of the records, or calibration of process-monitoring instruments) performed by the responsible establishment employee {9 CFR part 417.5 (a) (3)}.

61. NAME OF AUDITOR

Nader Memarian, DVM

62. AUDITOR SIGNATURE AND DATE



04-29-04

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Zwanenberg Food Group B.V. Westdorplaan 225 8101 PN, Raalte	2. AUDIT DATE 04/20/2004	3. ESTABLISHMENT NO. NL-153-BEG	4. NAME OF COUNTRY The Netherlands
		5. NAME OF AUDITOR(S) Dr. Nader Memarian	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	
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.	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	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 <i>E. coli</i> 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

Establishment NL-153-EEG

Audit Date: 04/20/2004

Processing: Caning

22.51 Verification records did not include an initial for each entry by the responsible establishment employee {9CFR part 417.5(b)}.

61. NAME OF AUDITOR

Nader Memarian, DVM

62. AUDITOR SIGNATURE AND DATE

Nader Memarian, DVM 04-20-04

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Hendrix Meat Group B.V. Kerkstraat 40 6651 KG, Druten	2. AUDIT DATE 04/21/2004	3. ESTABLISHMENT NO. NL-236-EEG	4. NAME OF COUNTRY The Netherlands
		5. NAME OF AUDITOR(S) Dr. Nader Memarian	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	
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.	X	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	
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		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

Establishment NL-236-EEG

Audit Date: 04/21/2004

Slaughter Processing

- 11 Carcasses with dressing defects on the trim line were in direct contact with each other (9CFR part 416.14). Establishment took appropriate corrective actions to comply with regulation 416.15.

61. NAME OF AUDITOR

Nader Memarian, DVM

62. AUDITOR SIGNATURE AND DATE

Nader Memarian DVM 04-21-04

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Dumeco Apeldoorn B.V. Laan van Malkenschoten 77, 7333 NP Apeldoorn	2. AUDIT DATE 04/08/2004	3. ESTABLISHMENT NO. NL-312-EEG	4. NAME OF COUNTRY The Netherlands
5. NAME OF AUDITOR(S) Dr. Nader Memarian		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	
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.	X	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	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 <i>E. coli</i> 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		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

Establishment NL-312-EEG

Audit Date: 04/08/2004

Slaughter Processing

- 11:51 A) Neck and jowls of the contaminated hog carcasses (on the trim line) were contacting employees' work platform and boots in the slaughter room (9 CFR part 416.14).
- B) The trim room's sanitizer was not suitable in size or design to adequately sanitize some of the Hand tools (a small circular saw and a hand saw) being used for trimming contaminated carcasses (9 CFR part 416.14).

61. NAME OF AUDITOR

Nader Memarian, DVM

62. AUDITOR SIGNATURE AND DATE

Nader Memarian, DVM

04-08-04

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Dumeco Helmond B.V. Graandijk 5 5704 RB Helmond	2. AUDIT DATE 04/19/2004	3. ESTABLISHMENT NO NL-378-EEG	4. NAME OF COUNTRY The Netherlands
		5. NAME OF AUDITOR(S) Dr. Nader Memarian	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	
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.	X	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	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 <i>E. coli</i> 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		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

Establishment NL-378-EEG

Audit date: 04.19.2004

Slaughter Processing

- 11 Carcasses with dressing defects on the trim line were in direct contact with each other (9CFR part 416.14). Establishment took appropriate corrective actions to comply with regulation 416.15.

- 47/51 Production line employees did not remove or change their working clothing before or after using restrooms {9CFR part 416.5 (a)}.

61. NAME OF AUDITOR

Nader Memarian, DVM

62. AUDITOR SIGNATURE AND DATE

Nader Memarian 04-19-04

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Jan Roemaat Koel-en Vrieshuizen B.V. Kerkstraat 66 7135 JM Harreveld (Lichtenvoorde)	2. AUDIT DATE 04/15/2004	3. ESTABLISHMENT NO NL-505-EEG	4. NAME OF COUNTRY The Netherlands
5. NAME OF AUDITOR(S) Dr. Nader Memarian		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 .	O	41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	O	42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.	O	43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.	O	44. Dressing Rooms/Lavatories	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		45. Equipment and Utensils	
18. Monitoring of HACCP plan.	O	46. Sanitary Operations	
19. Verification and validation of HACCP plan.	O	47. Employee Hygiene	
20. Corrective action written in HACCP plan.	O	48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.	O	Part F - Inspection Requirements	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	O	49. Government Staffing	
Part C - Economic / Wholesomeness		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	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)	O	54. Ante Mortem Inspection	O
Part D - Sampling Generic <i>E. coli</i> 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

Establishment NL-505- EEG

Audit Date: 04/15/2004

Cold Storage Facility

13/51 The establishment records did not document all three parts of the corrective actions (especially to prevent recurrence) for SSOP deficiencies (9CFR part 416.15).

61. NAME OF AUDITOR

Nader Memarian, DVM

62. AUDITOR SIGNATURE AND DATE

Nader Memarian, DVM

04-15-04

United States Department of Agriculture
Food Safety and Inspection Service
Director International Equivalence Staff
Office of International Affairs
dr. Sally White
Washington D.C. 20520
U.S.A.



landbouw, natuur en
voedselkwaliteit

Your letter of	your reference	our reference	date
Aug. 12, 2004		VD 04.2848/AV	24-09-2004
re:		extension no.	enclosures
Comments on FSIS draft audit report		0031-70-3784778 fax: 001-202- 6904040	

Dear Dr. White,

Thank you for your Mr. McDermott's letter of 12 August 2003.

I am pleased to present my views on the draft final audit report, following an on-site meat inspection audit carried out by FSIS inspectors from 7 April to 6 May 2004.

In the final meeting it was agreed that we could give our comments within 60 days after receipt of the draft report.

I was glad to find the positive impression of the final meeting reflected in the report and in your letter. These are my remarks:

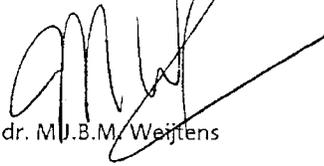
- It is clear that our meat inspection system has convinced the audit team of the quality, the internationally accepted standards and the guaranteed safe production of meat in the Netherlands.
- Palpation of the mesenteric lymph nodes in de US approved establishments is become mandatory since end 2003. In order to apply this inspection proceeding consciously the inspection points have been modified as well as the handbooks of the slaughterhouse. This new system works satisfactorily.
- During the audit there were some pigs found where the mandibularic lymph nodes were not cut. This single fault was solved immediately. I would like to clarify that this incident has no relation to the point about the palpation of the mesenteric lymph nodes and should be corrected in the final report.
- We have found the remarks made by the FSIS inspectors during their visit very helpful. They were made in a constructive manner, which was also much appreciated by the representatives of the meat establishments.
- Training of national inspection service for livestock and meat staff working in US approved establishments is taking place on a permanent basis.
- We have received within 30 days notification of the corrective actions, which were taken place during of after the audit from the establishments as from the regional national inspection service for livestock and meat offices.

Ministry of Agriculture,
Nature and Food Quality
Directie Voedings- en
Veterinaire
Aangelegenheden
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Bezuidenhoutseweg 73
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2500 EK Den Haag
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Fax: 070-3786141
Telegram Address: Landvis
www.minlnv.nl

Date	Reference	Following page
24-09-2004	VD 04.2848/AV	2

Dear Dr. White, I once again wish to express my positive feelings regarding your letter and the draft report and hope that the above remarks can be included in the final report.

Yours sincerely,
Dep. CHIEF VETERINARY OFFICER,



dr. M.J.B.M. Weijtens