



United States
Department of
Agriculture

Food Safety
and Inspection
Service

Washington, D.C.
20250

DEC 17 2002

Dr. Tony Zohrab
Director, Animal Products
MAF Regulatory Authority
Ministry of Agriculture and Forestry, New Zealand
ASB Bank House, 101-103 the Terrace
Post Office Box 2526
Wellington, New Zealand

Dear Dr. Zohrab:

The Food Safety and Inspection Service (FSIS) conducted an on-site audit of New Zealand's meat inspection system from April 3 through April 30, 2002. Enclosed is a copy of the final audit report. Comments by New Zealand on the draft final audit report have been included as Attachment "G" in the enclosed final audit report.

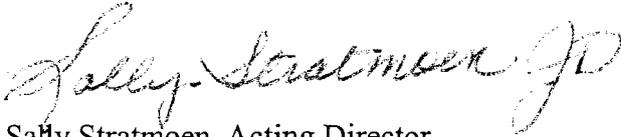
FSIS has carefully reviewed the assurances provided by New Zealand at the Exit Conference in Wellington on April 30, 2002 and the comments contained in your November 5, 2002 response to the draft final audit report. We appreciate your commitment to correct most of the deficiencies found during the audit. With regard to the omission of fecal contamination as a microbiological hazard, FSIS requires that it be included in the hazard analysis of each establishment and that it is listed as a critical control point. FSIS also requires a zero tolerance for fecal contamination.

Regarding monthly supervisory visits, FSIS is concerned that supervisory visits may not occur on a monthly basis under certain conditions. FSIS regulations (Section 327.2 of 9 Code of Federal Regulations) require "periodic supervisory visits by a representative of the foreign inspection system not less frequent than one such visit per month to each establishment certified..." for export to the United States and requires that these visits result in "written reports prepared by the representative of the foreign inspection system who has conducted a supervisory visit..." FSIS requires that (1) supervisory visits occur once each calendar month, (2) a report is generated from each visit, and (3) supervisory visits are made by a qualified official who is not assigned to 'inspect' the establishment. FSIS also expects that the visits and reports are used to ascertain trends relative to each establishment and to track and resolve the negative findings from each visit. These issues will be reviewed, in depth, during our next system audit of New Zealand.

Finally, as a reminder, if an establishment is delisted during an audit, FSIS does not accept a re-certification of the establishment until the government inspection service provides FSIS with a written description of all corrective and preventative actions that had been taken. In addition, the establishment would be re-audited during our next systems audit of the meat inspection system, provided the country had successfully re-certified the establishment for export to the United States. If a re-certified establishment is delisted again during the re-audit, FSIS would not accept the establishment as re-certified until FSIS auditors returned for another follow-up audit and were able to verify that all deficiencies have been corrected.

If you have any questions regarding this letter or the final audit report, please do not hesitate to contact me at your convenience. I can be contacted by telephone at 202-720-3781, by e-mail at sally.stratmoen@fsis.usda.gov, or by facsimile at 202-690-4040.

Sincerely,

A handwritten signature in cursive script that reads "Sally Stratmoen JD".

Sally Stratmoen, Acting Director
Equivalence Staff
Office of International Affairs

Enclosure

cc:

Jason Frost, Counselor, Embassy of New Zealand
David Young, Minister Counselor, American Embassy, Wellington
Ross Kreamer, FAS Area Officer
Linda Swacina, Associate Administrator, FSIS
Karen Stuck, Acting DAA, OIA, FSIS
Maritza Colon-Pullano, SAIFS, OPPDE, FSIS
Clark Danford, IED, OIA, FSIS
Sally Stratmoen, ED, OIA, FSIS
Donald Smart, TSC, FSIS
Amy Winton, State Department
Gene Philhower, FAS
Richard F. Brown, ED, OIA, FSIS
Country File (New Zealand – FY 2002 Audit)



AUDIT REPORT FOR NEW ZEALAND APRIL 3 THROUGH APRIL 30, 2002

INTRODUCTION

Background

This report reflects information that was obtained during an audit of New Zealand's meat inspection system from April 3 through April 30, 2002. Thirteen of the 73 establishments certified to export meat to the United States (U.S.) were audited. Nine of these were slaughter and processing (cutting and boning) establishments and four were conducting processing operations only.

The last audit of the New Zealand meat inspection system was conducted in May/June of 2001. Seventy-two establishments were certified for U.S. export at that time; nine of these were audited. The auditor found serious deficiencies regarding slaughter/processing controls in three establishments (ME15, ME32, and ME86). In Establishment ME15, the buccal cavity was washed after opening the cavity thus exposing the cut surfaces of edible product to ingesta. The anal cut was continued into other tissues without first sanitizing the knife. Poison rodent baits were located in the box storage room. In Establishment ME32, fecal contamination was observed on carcasses in the carcass cooler and there was urine contamination in Establishment ME86. Other major concerns reported at that time included:

1. Preventive action in the Sanitation Standard Operating Procedures (SSOPs) and Hazard Analysis and Critical Control Point (HACCP) programs was not recorded in almost all establishments visited.
2. The random selection of the carcasses for *Escherichia coli* (*E. coli*) and *Salmonella* testing was not done in almost all establishments visited.

All the above deficiencies were corrected at the time of this audit except HACCP-related documents in Establishment ME15 and ME86, which are mentioned in the HACCP Implementation section of this report.

During calendar year 2001, New Zealand establishments exported 492,076,930 pounds of beef, mutton, lamb and goat to the United States; 181,374,408 pounds of meat products were re-inspected; and 1,407,320 pounds of meat products were rejected at the port-of-entry (POE) inspection. The causes of port-of-entry rejection were contamination, processing defects, missing shipping marks, transportation damage, labeling defects, pathological defects, and miscellaneous.

PROTOCOL

This on-site audit was conducted in four parts. One part involved visits with New Zealand national meat inspection officials to discuss oversight programs and practices, including enforcement activities. The second entailed an audit of a selection of records in the country's meat inspection headquarters facilities preceding the on-site visits. The third was conducted by on-site visits to establishments. The fourth was a visit to two laboratories performing analytical testing of field samples for the national residue testing program, and culturing of field samples for the presence of microbiological contamination.

New Zealand's program effectiveness was assessed by evaluating five areas of risk: (1) sanitation controls, including the implementation and operation of Sanitation Standard Operating Procedures (SSOPs), (2) animal disease controls, (3) residue controls, (4) slaughter/ processing controls, including the implementation and operation of Hazard Analysis and Critical Control Point (HACCP) systems and the *Escherichia coli* (*E. coli*) testing program, and (5) enforcement controls, including inspection system controls and the testing program for *Salmonella* species.

During all on-site establishment visits, the auditor evaluated the nature, extent, and degree to which findings impacted on food safety and public health, as well as overall program delivery. The auditor also determined if establishment and inspection system controls were in place. Establishments that do not have effective controls in place to prevent, detect and eliminate product contamination/adulteration are considered unacceptable and therefore ineligible to export products to the U.S., and are delisted accordingly by the country's meat inspection officials.

RESULTS AND DISCUSSION

Summary

Effective inspection system controls were found to be in place in all establishments audited, except one establishment, ME 117, which was temporarily suspended for exportation to United States by New Zealand authorities. After correcting the deficiencies, the establishment was again permitted to export. Details of audit findings, including compliance with HACCP, SSOP, and testing programs for *Salmonella* and generic *Escherichia coli* (*E. coli*) are discussed later in this report.

Entrance Meeting

On April 3, 2002, an entrance meeting was held in the Wellington offices of the Food Assurance Authority (FAA) of the Ministry of Agriculture and Forestry (MAF), and was attended by Dr. Tony Zohrab, Director, Animal Products; Dr. John Lee, Program Manager, Market Access, FAA; Dr. Roger Cook, National Manager (Microbiology) FAA; Mr. Neil Kiddey, Manager, Compliance and Investigation, FAA; Dr. Judi Lee, Program Manager,

Program Development Group, FAA; Dr. Chris Mawson, Agency Technical Manager, MAF Verification Agency (VA); Dr. Steve Ainsworth , Technical Specialist , MAF VA; Ms. Judy Barker, FAA; Ms. Susanna Barris, FAA; Mr. David Young, Agricultural Attache; U. S. Embassy and Dr. Suresh P. Singh, USDA International Audit Staff Officer. Topics of discussion included the following:

1. Finalization of the audit itinerary.
2. HACCP-equivalence and issues by Judi Lee.
3. Overview of the Animal Products Act 1999.
4. New Zealand officials stated that it was not possible to centralize the records of establishments that were to have a “records only” audit. However, the Compliance Investigation Group (CIG) and Veterinary Verification Agency of MAF agreed to get pertinent records by fax and mail and CIG files for the records audit at the MAF, Headquarters Office, Wellington.
5. The auditor was briefed regarding ratite equivalence issues and Risk Management Programs (RMP) initiated by MAF in all meat establishments.

Headquarters Audit

There had been no changes in the organizational structure or upper levels of inspection staffing since the last U.S. audit of New Zealand’s inspection system in May/June 2001.

To gain an accurate overview of the effectiveness of inspection controls, FSIS requested that the inspection officials who normally conduct the periodic reviews for compliance with U.S. specifications lead the audits of the individual establishments. The FSIS auditor (hereinafter called “the auditor”) observed and evaluated the process.

Establishment documents from 14 randomly selected establishments that were not scheduled for on-site visits were also audited. This records review was conducted at the inspection system headquarters in Wellington. The records review focused primarily on food safety hazards and included the following:

- Training records for inspectors and laboratory personnel.
- Label approval records and special label claims.
- New laws and implementation documents such as regulations, notices, directives and guidelines, and examples of how new requirements are communicated to field personnel.
- Sanitation Standard Operating Procedures, Hazard Analysis and Critical Control Points programs, generic *E.coli* and *Salmonella* testing programs.
- Control of products from livestock with conditions such as tuberculosis and cysticercosis, 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 non-compliant product, and withholding, suspending, and/or withdrawing inspection services from or delisting an establishment that is certified for U.S. export.
- The national program for field sampling for microbiology and residue testing programs.
- Reports resulting from internal supervisory visits to establishments that were certified for U.S. export.
- Records generated in compliance with Pathogen Reduction requirements (SSOP, HACCP programs, generic *E. coli* testing and *Salmonella* testing).

The following concerns arose as a result the examination of these documents.

- Corrective and preventive actions are not being recorded consistently in the SSOP programs (Establishments 47 and 64).
- Flow charts in HACCP documents did not include all process steps in Establishments 30, 64, 82 and 124, and *E. coli* testing was not being recorded on a process control chart in Establishment 64.
- The Hazard analysis did not include the microbiological food safety hazard of fecal contamination, and did not specify Critical Control Points (CCPs) in the HACCP plans and critical control limits were not measurable in Establishments 64, 82 and 100.
- No pre-shipment document reviews were found for Establishments 27, 64, and 100.

Government Oversight

All inspection service veterinarians are MAF-Verification Agency employees and inspectors in establishments certified for U.S. export were ASURE employees, receiving no remuneration from either industry or establishment personnel for services rendered in the fulfillment of their national meat/poultry inspection duties. ASURE is a State Owned Enterprise of the Ministry of State Enterprises which provides inspection services on behalf of MAF FAA.

The Compliance Investigation Group (CIG) of MAF is a separate Division that carries out audits of New Zealand's inspection system and reports directly to the Director of Animal Products of MAF-FAA.

Establishment Audits

Seventy-three establishments were certified to export meat to the United States at the time this audit was conducted. Nine of these establishments were randomly selected to be visited for on-site audits and four were included in the on-site visits because of their re-review status. With the exception of Establishment ME-117, which was suspended by New Zealand

officials and re-certified after the deficiencies were corrected during this audit, in all of the 13 establishments visited, both MAF inspection system controls and establishment system controls were in place to prevent, detect and control contamination and adulteration of products. Details of the audit findings are discussed in the Slaughter/Processing Controls section of this report.

Laboratory Audits

During laboratory audits, emphasis was placed on the application of procedures and standards that were equivalent to U.S. Information was also collected about the risk areas of government oversight of accredited, approved, and private laboratories; intra-laboratory quality assurance procedures, including sample handling; and methodology.

The Agri-Quality New Zealand Ltd. Laboratory, formerly the National Chemical Residue Laboratory in Upper Hutt, Wellington, was audited on April 9, 2002. Effective controls were in place for sample handling, sampling frequency, timely analysis, data reporting, analytical methodologies, tissue matrices for analysis, equipment operation and printouts, detection levels, recovery frequency, percent recoveries, intra-laboratory check samples, and quality assurance programs, including standards books and corrective actions. The methods used for the analyses were acceptable. No compositing of samples was done (this was not a deficiency).

New Zealand's microbiological testing for *E. coli* and *Salmonella* was being performed in private laboratories. One of these, the Agri-Quality New Zealand Ltd. Laboratory in Auckland, was audited. The methods used for the analyses were acceptable. The auditor determined that the system met the criteria established for the use of private laboratories under FSIS's Pathogen Reduction/HACCP rule.

These criteria are:

1. The laboratory is accredited/approved by the government, accredited by third party accrediting organization with oversight by the government, or a government contract laboratory.
2. The laboratory has properly trained personnel, suitable facilities and equipment, a written quality assurance program, and reporting and record-keeping capabilities.
3. Results of analyses are being reported to the government or simultaneously to the government and establishment.

Establishment Operations by Establishment Number

The following operations were being conducted in the 13 establishments audited on-site:

Establishments ME34, ME42, and ME86: beef and sheep slaughter and boning
Establishments ME15, ME32, ME 52, ME70, and ME 119: beef slaughter and boning

Establishment ME117: ratite, bovine and equine slaughter and boning
Establishment PH 353: sheep, goat and deer boning
Establishment PH 490: veal (calf) cutting and boning
Establishment PH 504: sheep and goat-cutting and boning
Establishment PH 173: beef and sheep cutting and boning

SANITATION CONTROLS

Sanitation Standard Operating Procedures (SSOP)

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOP were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment A).

The SSOP were found to meet the basic FSIS regulatory requirements with the following exceptions:

1. During the document review, it was noted that corrective action and preventive actions were not documented in Establishments ME47 and ME64.
2. During on-site visits of establishments, it was observed that corrective actions were not properly recorded in Establishments ME42 and ME86.

ANIMAL DISEASE CONTROLS

With the exception stated below, New Zealand's inspection system had controls in place to ensure adequate animal identification, ante-mortem and post-mortem inspection procedures and dispositions, condemned and restricted product control, and procedures for sanitary handling of returned and rework product.

1. Procedures for condemned product control were lacking in Establishment ME-117. Inedible material was not adequately denatured, containers for inedible and condemned product were cracked and leaking and the key to the condemned product room was not kept by an authorized person of the establishment.

There were reported to have been no outbreaks of animal diseases with public-health significance since the previous U.S. audit.

RESIDUE CONTROLS

New Zealand's National Residue Testing Plan for 2002 was being followed and was on schedule. The New Zealand inspection system had adequate controls in place to ensure compliance with sampling and reporting procedures and storage and use of chemicals.

SLAUGHTER/PROCESSING CONTROLS

Except as noted below, the New Zealand inspection system had controls in place to ensure adequate product protection and processed product control:

1. Establishment ME-42: The floor was not being cleaned often and therefore there was an accumulation of inedible product on the floor in the beef boning room. Peeling paint on the walls of the beef boning room was observed. In numerous locations, motors for conveyor belts were installed above the belt without any bottom tray or cover creating a potential source of contamination of products. Cross contamination of beef carcasses from the cooler door was observed.
2. Establishment PH-490: The boot wash facility was located inside the boning room close to the cutting table. A chemical used in the boot washing machine was not food grade chemical according to New Zealand officials. This created a potential for aerosol contamination of edible product.
3. Establishment PH-504: Used equipment and other metal junk material were stored close to the outside walls of establishment buildings, creating the potential for rodent harboring.

HACCP Implementation

All establishments approved to export meat products to the U.S. are required to have developed and implemented a Hazard Analysis – Critical Control Point (HACCP) system. Each of these systems was evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment B).

The HACCP programs were found to meet the basic FSIS regulatory requirements with the following exceptions:

During document review, it was noted that:

- Flow charts in HACCP documents did not include all process steps in Establishments 30, 64, 82 and 124.
- The hazard analysis did not include the microbiological food safety hazard of fecal contamination, did not specify Critical Control Points (CCPs) in the HACCP plans and critical control limits were not measurable in Establishments 64, 82 and 100.
- No pre-shipment document reviews were found for Establishments 27, 64, and 100.

During the on-site audits, it was observed that the contents of the HACCP plan did not list food safety hazards of microbiological (fecal) contamination in slaughter establishments (ME: 15, 42, 70, 86, and 117) and critical control points, critical limits, and corrective actions in Establishments ME: 15, 42, 70, 86, and 117 were not a part of HACCP programs. Fecal contamination in these slaughter establishments was identified as a hazard separate from the HACCP plan.

- Verification, validation and reassessment of HACCP plans were not recorded adequately in Establishments 32, 70 and 86.
- The boning establishments were found not to have any CCP; a hazard analysis was done but no hazards were identified. This was a repeat finding from the last audit.

Testing for Generic *E. coli*

New Zealand has adopted the FSIS regulatory requirements for *E. coli* testing with the exception of the following equivalent measures:

1. **GENERIC *E. COLI* TESTING STRATEGY:** Frequency of Testing. The criteria used for equivalence decisions for determining whether a different testing frequency for generic *E. coli* testing is equivalent are:
 - Testing frequency is based on production volume with at least one test per week.
 - The predominant class of animals slaughtered in an establishment is sampled.
2. **SAMPLING SITES:** Location of Sampling Sites. The criteria used for making equivalence decisions for determining whether different sample sites for *E. coli* testing is equivalent are:
 - The sample sites include the sites most likely to be contaminated with fecal contamination including the flank, brisket, and outside hind leg.
 - The sample sites encompass a large enough surface area to ensure that the effectiveness of the slaughter process controls will be evaluated.
 - The sample sites provide the same probability of detecting the presence of fecal contamination as the sites chosen by FSIS.
3. **SAMPLING TOOLS.** The criteria used for making equivalence decisions for approval of alternative sampling tools for sampling for *E. coli* are:
 - The tool is a traditional generally recognized sample collection tool for sampling for *E. coli* on meat or poultry surfaces.
 - The tool is sensitive enough to gather *E. coli* present on the sample site.
 - The tool does not contaminate the surfaces of the carcass.

Eight of the establishments audited were required to meet the basic FSIS regulatory requirements for generic *E. coli* testing, and were audited and evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment C).

The *E. coli* testing programs were found to meet the basic FSIS regulatory requirements except that testing results were not being recorded in chart form in Establishment ME-64.

Additionally, establishments had adequate controls in place to prevent meat products intended for New Zealand domestic consumption from being commingled with products eligible for export to the U.S.

ENFORCEMENT CONTROLS

Inspection System Controls

New Zealand's inspection system controls [ante- and post-mortem inspection procedures and dispositions, control of restricted product and inspection samples, control and disposition of dead, dying, diseased or disabled animals, boneless meat reinspection, shipment security, including shipment between establishments, prevention of commingling of product intended for export to the United States with domestic product, monitoring and verification of establishment programs and controls (including the taking and documentation of corrective actions under HACCP plans), inspection supervision and documentation, the importation of only eligible livestock or poultry from other countries (i.e., only from eligible countries and certified establishments within those countries), and the importation of only eligible meat or poultry products from other countries for further processing] were in place and effective in ensuring that products produced by the establishment were wholesome, unadulterated, and properly labeled. In addition, adequate controls were found to be in place for security items, shipment security, and products entering the establishments from outside sources.

Testing for *Salmonella* Species

Nine of the establishments audited were required to meet the basic FSIS regulatory requirements for *Salmonella* testing, and were evaluated according to the criteria employed in the U.S. domestic inspection program. The *Salmonella* testing programs were found to meet the regulatory requirements with equivalent measures. The data collection instrument used accompanies this report (Attachment D).

New Zealand has adopted the FSIS regulatory requirements for *Salmonella* testing with following equivalent different requirements:

1. **SAMPLE COLLECTOR: Establishment Takes Samples.**
 - MAF develops a written, national sampling plan and enforces a national *Salmonella* testing program for sample collection and processing that is followed in all New Zealand establishments that export meat products to the United States.
 - Sample collection procedures are directly reviewed via specific tasks that are assigned to a trained on-site veterinarian from MAF Verification Agency. The accredited laboratory and MILAB, which is now administered within the New Zealand Food Safety Authority (NZFSA), are also responsible for ensuring correct sampling procedures. Under the MILAB Scheme laboratory International Accreditation New Zealand accredits laboratories in accordance with ISO standards. MAF Food (Compliance) performs periodic audits of MILAB and MAF Verification, including the oversight and monitoring activities of the sample collector. MAF Food (Animal Products) has mandatory access to all microbiological test results, including *Salmonella* test results. The on-site MAF Verification Agency Veterinarian also has direct access to all *Salmonella* test results.

- MAF uses *Salmonella* test results to monitor the performance of each establishment over time.
 - The government of New Zealand (MAF) takes immediate action any time an establishment fails to meet a *Salmonella* performance standard.
2. LABORATORIES: Private laboratories analyze samples.
- The laboratories are government, independent non-government, or establishment laboratories that MILAB, administered within NZFSA, accredits. MILAB, in turn, is audited BI-annually by MAF Food (Compliance). MAF Food (Animal Products) sets MILAB standards. All laboratories are assessed to ISO 25 standards. MILAB accreditation and responsibilities are audited bi-annually and at the request of MAF Food (Animal Products) by MAF Food (Compliance). The Inter-Laboratory Comparison Program is a government program that conducts monthly proficiency tests with each accredited laboratory and is accredited to ISO 9000 and ISO Guide 43. The accreditation program is mandated, established, and regulated by MAF Food (Animal Products).
 - All accredited laboratories have a formal program which ensures that laboratory personnel are properly trained, that there are suitable facilities and equipment, that there is a written quality assurance program, and that there are adequate reporting and record-keeping facilities.
 - Test results are reported directly to MAF inspection personnel and it was observed that test results were also reported to the establishment.
3. SAMPLING TOOLS.
- The swab tool method of sample collection is used. The swab tool is an internationally recognized sample collection tool for sampling *Salmonella* on meat or poultry products, is sensitive enough to gather an adequate quantity of the *Salmonella* that are present at the sample sites, and does not contaminate surfaces of the carcasses.
4. SAMPLING TECHNIQUES: Time of Collection of Samples.
- Samples are taken at the end of the slaughter or production process from the same carcass (one side for *E. coli* and one side for *Salmonella*) and prior to the carcass being cut and/or packaged.

Species Verification

At the time of this audit, New Zealand was not exempt from the species verification-testing requirement. The auditor verified that species verification was being conducted in accordance with FSIS requirements.

Monthly Reviews

Supervisory reviews of certified establishments are conducted by the MAF Compliance and Investigation Group (CIG), by the MAF Verification Agency (VA), and by the local office

veterinary supervisors. CIG audits occur anywhere from quarterly to annually and are supervisory verification audits conducted by the National office or by Regional Authority Compliance Officers. VA reviews are inspector reviews and are conducted by Regional Review Officers. VA reviews are also performance based and range from twice every month to once every three months. Veterinary supervisors conduct non-routine audits as needed.

Although monthly supervisory visits are not required or intentional, some type of verification or supervisory audit or review was conducted on a monthly basis in 12 of 13 establishments. In Establishment ME-119, no review or audit was performed during one three month period. The use and follow-up actions generated by each visit was not determined during this audit.

Enforcement Activities

Prosecution details are in Compliance Investigation Group (CIG) files. CIG reports all cases to Prosecuting Officials of MAF under Meat Act of 1981 and the Animal Products Act of 1999.

There are two pending cases at the present time:

1. Illegal possession and sale of uninspected meat and poultry
2. Bobby calf residue violation.

Exit Meetings

An exit meeting was conducted in Wellington on April 30, 2002. The participants included Dr. Tony Zohrab, MAF Director Animal Products; Dr. Roger Cook, MAF Microbiology; Dr. Geoff Allen, MAF compliance Director; Dr. Chris Mawson, MAF VA Director; MAF; Mr. Neil Kiddey, MAF Compliance; Ms. Judy Barker, Program Manager, Risk Management, MAF; Dr. Judi Lee, Program Manager (Program Development), MAF; Dr. John Lee, Program Manager (Market Access); Dr. Phil Ward, MAF Europe; Ms. Susanna Barris, MAF; Mr. Owen Symmans, Meat Industry Association; Mr. David Young, Agriculture Attaché; Mr. Stephen Benson, Agriculture Analyst; U.S.Embassy, Wellington; and Dr. Suresh P. Singh, USDA International Audit Staff Officer.

The following topics were discussed:

1. Observations and findings of establishments and deficiencies. The records-only audits revealed several points regarding HACCP programs. A hazard analysis was done but revealed no hazards. There was a discussion about fecal zero tolerance not being included in the HACCP plans of establishments.
2. The frequency of monitoring of CCPs was not included in the main HACCP plans but referred to SSOP and GMPs.
3. Re-assessment of HACCP plans was not annually recorded in the establishments.
4. The monthly reviews and CIG audits.
5. Various equivalence issues were discussed.

Assurances were given by New Zealand officials to address deficiencies noted on the basis that outstanding issues such as ASURE and those noted in this report would be the subject of further dialogue between FSIS and MAF FAA. At the time this report was written, MAF FAA had been incorporated into the New Zealand Food Safety Authority and continues to fulfill the role of competent authority.

CONCLUSION

The inspection system of New Zealand was found to have effective controls to ensure that product destined for export to the United States was produced under conditions equivalent to those which FSIS requires in domestic establishments. Thirteen establishments were audited. The deficiencies encountered during the on-site audits in the establishments were adequately addressed to the auditor's satisfaction.

Suresh P. Singh, D.V.M., Ph.D.
International Audit Staff Officer

(Signed) Suresh P. Singh, D.V.M., Ph.D.

ATTACHMENTS

- A. Data collection instrument for SSOP.
- B. Data collection instrument for HACCP programs
- C. Data collection instrument for *E. coli* testing
- D. Data collection instrument for *Salmonella* testing
- E. Laboratory Audit Form
- F. Individual Foreign Establishment Audit Forms
- G. Written Foreign Country's Response to the Draft Final Audit Report

Data Collection Instrument for SSOPs

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOPs were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument contained the following statements:

1. The establishment has a written SSOP program.
2. The procedure addresses pre-operational sanitation.
3. The procedure addresses operational sanitation.
4. The pre-operational procedures address (at a minimum) the cleaning of food-contact surfaces of facilities, equipment, and utensils.
5. The procedure indicates the frequency of the tasks.
6. The procedure identifies the individuals responsible for implementing and maintaining the activities.
7. The records of these procedures and any corrective action taken are being maintained on a daily basis.
8. The procedure is dated and signed by the person with overall on-site authority.

The results of these evaluations were as follows:

Est. #	1. Written program addressed	2. Pre-op sanitation addressed	3. Oper. Sanitation addressed	4. Contact surfaces addressed	5. Frequency addressed	6. Responsible indiv. Identified	7. Documentation done daily	8. Dated and signed
15	√	√	√	√	√	√	√	√
32	√	√	√	√	√	√	√	√
34	√	√	√	√	√	√	√	√
42	√	√	√	√	√	√	No	√
52	√	√	√	√	√	√	√	√
70	√	√	√	√	√	√	√	√
86	√	√	√	√	√	√	No	√
117	√	√	√	√	√	√	√	√
119	√	√	√	√	√	√	√	√
173	√	√	√	√	√	√	√	√
353	√	√	√	√	√	√	√	√
490	√	√	√	√	√	√	√	√
504	√	√	√	√	√	√	√	√

In establishment 42 and 86 corrective actions were not documented daily.

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit:

09	√	√	√	√	√	√	√	√
17	√	√	√	√	√	√	√	√
26	√	√	√	√	√	√	√	√
Ph27	√	√	√	√	√	√	√	√
Ph30	√	√	√	√	√	√	√	√
47	√	√	√	√	√	√	No	√
58	√	√	√	√	√	√	√	√
64	√	√	√	√	√	√	No	√
78	√	√	√	√	√	√	√	√
82	√	√	√	√	√	√	√	√
100	√	√	√	√	√	√	√	√
103	√	√	√	√	√	√	√	√
124	√	√	√	√	√	√	√	√
367	√	√	√	√	√	√	√	√

In Establishments 47 and 64, corrective actions and preventive actions were not documented daily and not verified by the MAF Verification agency.

Data Collection Instrument for HACCP Programs

Each of the establishments approved to export meat products to the U.S. was required to have developed and implemented a Hazard Analysis – Critical Control Point (HACCP) system. Each of these systems was evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument included the following statements:

1. The establishment has a flow chart that describes the process steps and product flow.
2. The establishment has conducted a hazard analysis that includes food safety hazards likely to occur.
3. The analysis includes the intended use of or the consumers of the finished product(s).
4. There is a written HACCP plan for each product where the hazard analysis revealed one or more food safety hazard(s) reasonably likely to occur.
5. All hazards identified in the analysis are included in the HACCP plan; the plan lists a CCP for each food safety hazard identified.
6. The HACCP plan specifies critical limits, monitoring procedures, and the monitoring frequency performed for each CCP.
7. The plan describes corrective actions taken when a critical limit is exceeded.
8. The HACCP plan was validated using multiple monitoring results.
9. The HACCP plan lists the establishment's procedures to verify that the plan is being effectively implemented and functioning and the frequency for these procedures.
10. The HACCP plan's record-keeping system documents the monitoring of CCPs and/or includes records with actual values and observations.
11. The HACCP plan is dated and signed by a responsible establishment official.
12. The establishment is performing and documenting pre-shipment document reviews as required.

The results of these evaluations were as follows:

Est. #	1. Flow diagram	2. Haz. analysis –all ID'ed	3. Use & users included	4. Plan for each hazard	5. CCPs for all hazards	6. Monitoring is specified	7. Corr. actions are described	8. Plan validated	9. Adequate verific. Procedures	10. Adequate documentation	11. Dated and signed	12. Pre-shipment doc. reviews
15	√	√	√	√	No	√	√	√	√	√	√	√
32	√	√	√	√	√	√	√	No	No	√	√	√
34	√	√	√	√	√	√	√	√	√	√	√	√
42	√	√	√	√	No	√	√	√	√	√	√	√
52	√	√	√	√	√	√	√	√	√	√	√	√
70	√	√	√	√	No	√	√	No	No	√	√	√
86	√	√	√	√	No	√	√	No	No	√	√	√
117	√	√	√	√	No	√	√	√	√	√	√	√
119	√	√	√	√	√	√	√	√	√	√	√	√
173	√	√	√	√	√	√	√	√	√	√	√	√
353	√	√	√	√	√	√	√	√	√	√	√	√
490	√	√	√	√	√	√	√	√	√	√	√	√
504	√	√	√	√	√	√	√	√	√	√	√	√

In Establishments ME15, 42, 70, 86, and 117, fecal contamination was not addressed in HACCP plans. Validation and verification of HACCP plans were not recorded adequately in Establishments 32, 70 and 86.

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit:

Est. #	1. Flow diagram	2. Haz. analysis –all ID'ed	3. Use & users included	4. Plan for each hazard	5. CCPs for all hazards	6. Monitoring is specified	7. Corr. actions are described	8. Plan validated	9. Adequate verific. procedures	10. Adequate documentation	11. Dated and signed	12. Pre-shipment doc. reviews
09	√	√	√	√	√	√	√	√	√	√	√	√
17	√	√	√	√	√	√	√	√	√	√	√	√
26	√	√	√	√	√	√	√	√	√	√	√	√
27	√	√	√	√	√	√	√	√	√	√	√	No
Ph30	No	√	√	√	√	√	√	√	√	√	√	√
47	√	√	√	√	√	√	√	√	√	√	√	√
58	√	√	√	√	√	√	√	√	√	√	√	√
64	No	√	√	√	No	√	√	√	√	√	√	No
78	√	√	√	√	√	√	√	√	√	√	√	√
82	No	√	√	√	No	√	√	√	√	√	√	√
100	√	√	√	√	No	√	√	√	√	√	√	No
103	√	√	√	√	√	√	√	√	√	√	√	√
124	No	√	√	√	√	√	√	√	√	√	√	√
367	√	√	√	√	√	√	√	√	√	√	√	√

Flow charts in HACCP plan did not include all process steps in Establishments 30, 64, 82 and 124. Hazard Analysis did not include microbiological food safety hazard of fecal contamination in Establishments 64, 82 and 100. They were addressed as procedures and techniques controlled by Technical Directive. No pre-shipment document reviews were found for Establishments 27, 64 and 100.

Data Collection Instrument for Generic *E. coli* Testing

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for generic *E. coli* testing were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument contained the following statements:

1. The establishment has a written procedure for testing for generic *E. coli*.
2. The procedure designates the employee(s) responsible to collect the samples.
3. The procedure designates the establishment location for sample collecting.
4. The sample collection is done on the predominant species being slaughtered.
5. The sampling is done at the frequency specified in the procedure.
6. The proper carcass site(s) and/or collection methodology (sponge or excision) is/are being used for sampling.
7. The carcass selection is following the random method specified in the procedure or is being taken randomly.
8. The laboratory is analyzing the sample using an AOAC Official Method or an equivalent method.
9. The results of the tests are being recorded on a process control chart showing the most recent test results.
10. The test results are being maintained for at least 12 months.

Est. #	1. Written procedure	2. Sampler designated	3. Sampling location given	4. Predomin. Species sampled	5. Sampling at the req'd freq.	6. Proper site or method	7. Sampling is random	8. Using AOAC method	9. Chart or graph of results	10. Results are kept at least 1 yr
15	√	√	√	√	√	√	√	√	√	√
32	√	√	√	√	√	√	√	√	√	√
34	√	√	√	√	√	√	√	√	√	√
42	√	√	√	√	√	√	√	√	√	√
52	√	√	√	√	√	√	√	√	√	√
70	√	√	√	√	√	√	√	√	√	√
86	√	√	√	√	√	√	√	√	√	√
117	√	√	√	√	√	√	√	√	√	√
119	√	√	√	√	√	√	√	√	√	√

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit:

09	√	√	√	√	√	√	√	√	√	√
17	√	√	√	√	√	√	√	√	√	√
26	√	√	√	√	√	√	√	√	√	√
47	√	√	√	√	√	√	√	√	√	√
58	√	√	√	√	√	√	√	√	√	√
64	√	√	√	√	√	√	√	√	No	√
78	√	√	√	√	√	√	√	√	√	√
82	√	√	√	√	√	√	√	√	√	√
100	√	√	√	√	√	√	√	√	√	√
103	√	√	√	√	√	√	√	√	√	√
124	√	√	√	√	√	√	√	√	√	√

Data Collection Instrument for *Salmonella* testing

Each slaughter establishment was evaluated to determine if the basic FSIS regulatory requirements for *Salmonella* testing were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument included the following statements:

1. *Salmonella* testing is being done in this establishment.
2. Carcasses are being sampled.
3. Ground product is being sampled.
4. The samples are being taken randomly.
5. The proper carcass site(s) and/or collection of proper product (carcass or ground) is being used for sampling.
6. Establishments in violation are not being allowed to continue operations.

The results of these evaluations were as follows:

Est. #	<i>1. Testing as required</i>	<i>2. Carcasses are sampled</i>	3. Ground product is sampled	4. Samples are taken randomly	5. Proper site and/or proper prod.	6. Violative est's stop operations
15	√	√	N/A	√	√	√
32	√	√	N/A	√	√	√
34	√	√	N/A	√	√	√
42	√	√	N/A	√	√	√
52	√	√	N/A	√	√	√
70	√	√	N/A	√	√	√
86	√	√	N/A	√	√	√
117	√	√	N/A	√	√	√
119	√	√	N/A	√	√	√

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit:

09	√	√	N/A	√	√	√
17	√	√	N/A	√	√	√
26	√	√	N/A	√	√	√
47	√	√	N/A	√	√	√
58	√	√	N/A	√	√	√
64	√	√	N/A	√	√	√
78	√	√	N/A	√	√	√
82	√	√	N/A	√	√	√
100	√	√	N/A	√	√	√
103	√	√	N/A	√	√	√
124	√	√	N/A	√	√	√

U.S. DEPARTMENT OF AGRICULTURE
 FOOD SAFETY AND INSPECTION SERVICE
 INTERNATIONAL PROGRAMS

REVIEW DATE

NAME OF FOREIGN LABORATORY

04-09-2002

AGRI_QUALITY NZ LTD.

FOREIGN COUNTRY LABORATORY REVIEW

FOREIGN GOV'T AGENCY
 MAF_Food Assurance Authority

CITY & COUNTRY
 Wellington, New Zealand

ADDRESS OF LABORATORY
 Wallaceville research Station, Upper Hutt

NAME OF REVIEWER
 Dr.S.P. Singh

NAME OF FOREIGN OFFICIAL
 Dr.Ziggy Bojarski and Ms.Helen Sillars

Residue Code/Name		100	111	200	300	500	600	700	800	902	903	904	
SAMPLING PROCEDURES	REVIEW ITEMS	ITEM #	EVALUATION CODE										
	Sample Handling	01	A	A	A	A	A	A	A	A	A	A	A
	Sampling Frequency	02	A	A	A	A	A	A	A	A	A	A	A
	Timely Analyses	03	A	A	A	A	A	A	A	A	A	A	A
	Compositing Procedure	04	O	O	O	O	O	O	O	O	O	O	O
	Interpret Comp Data	05	O	O	O	O	O	O	O	O	O	O	O
Data Reporting	06	A	A	A	A	A	A	A	A	A	A	A	
ANALYTICAL PROCEDURES	Acceptable Method	07	A	A	A	A	A	A	A	A	A	A	
	Correct Tissue(s)	08	A	A	A	A	A	A	A	A	A	A	
	Equipment Operation	09	A	A	A	A	A	A	A	A	A	A	
	Instrument Printouts	10	A	A	A	A	A	A	A	A	A	A	
QUALITY ASSURANCE PROCEDURES	Minimum Detection Levels	11	A	A	A	A	A	A	A	A	A	A	
	Recovery Frequency	12	A	A	A	A	A	A	A	A	A	A	
	Percent Recovery	13	A	A	A	A	A	A	A	A	A	A	
	Check Sample Frequency	14	A	A	A	A	A	A	A	A	A	A	
	All analyst w/Check Samples	15	A	A	A	A	A	A	A	A	A	A	
	Corrective Actions	16	A	A	A	A	A	A	A	A	A	A	
International Check Samples	17	A	A	A	A	A	A	A	A	A	A		
REVIEW PROCEDURES	Corrected Prior Deficiencies	18	A	A	A	A	A	A	A	A	A	A	
OTHER REVIEW		19											
		20											

SIGNATURE OF REVIEWER

Surinder P. Singh, DVM Ph.D.

DATE

04/09/2002

U.S. DEPARTMENT OF AGRICULTURE
 FOOD SAFETY AND INSPECTION SERVICE
 INTERNATIONAL PROGRAMS

REVIEW DATE
 04-19-2002

NAME OF FOREIGN LABORATORY
 AGRI-QUALITY NE ZEALAND LTD.

FOREIGN COUNTRY LABORATORY REVIEW

FOREIGN GOV'T AGENCY
 MAF-Food Assurance Authority

CITY & COUNTRY
 Auckland, New Zealand

ADDRESS OF LABORATORY
 P.B.14946, Penmure, Auckland

NAME OF REVIEWER
 Dr.S.P.Singh

NAME OF FOREIGN OFFICIAL
 Dr.Ziggy Bojarski

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

SIGNATURE OF REVIEWER
Sanjay P. Singh D.V.M. Ph.D

DATE
 04/19/2002

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Clover Export Ltd. GORE	2. AUDIT DATE 04-10-02	3. ESTABLISHMENT NO ME-117	4. NAME OF COUNTRY New Zealand
5. NAME OF AUDITOR(S) Dr.S.Singh		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)		Audit Results	Part D - Continued Economic Sampling		Audit Results
Basic Requirements					
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.			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.		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		
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		X
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/AQU/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

New Zealand –Establishment No..ME-117

Audit Date: 04-10-02

15=No critical control Point for fecal contamination was mentioned in the HACCP It was being handled by Technical Directive.

48= Inedible material not adequately denatured; keys to condemned product room held by unauthorized person (truck Driver) and several round bins containing inedible product were cracked and leaking.

61. NAME OF AUDITOR

S. P. Singh

62. AUDITOR SIGNATURE AND DATE

Foreign Establishment Audit Checklist

1 ESTABLISHMENT NAME AND LOCATION ANZCO Green Island Ltd. Grand Island, Dunedin	2 AUDIT DATE 04-11-02	3 ESTABLISHMENT NO PII-173	4 NAME OF COUNTRY NEW ZEALAND
	5 NAME OF AUDITOR(S) Dr.S.Singh	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.		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)		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

New Zealand-Establishment No.PH-173

Audit date: 04-11-02

61. NAME OF AUDITOR
S. P. Singh

62. AUDITOR SIGNATURE AND DATE

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION PPCS-Burnside Division Burnside, Dunedin	2. AUDIT DATE 04-12-02	3. ESTABLISHMENT NO PH-353	4. NAME OF COUNTRY NEW ZEALAND
	5. NAME OF AUDITOR(S) Dr.S.Singh	6. TYPE OF AUDIT <input 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.		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)		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

New Zealand- Establishment No. PH-353

Audit Date: 04-12-2002

61. NAME OF AUDITOR

62. AUDITOR SIGNATURE AND DATE

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Canterbury Frozen Meat Co.Ltd. Parepora	2. AUDIT DATE 04-15-02	3. ESTABLISHMENT NO ME-34	4. NAME OF COUNTRY NEW ZEALAND
	5. NAME OF AUDITOR(S) Dr.S.Singh	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.		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/AQU/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

New Zealand ME-34

Audit Date: 04-15-2002

61. NAME OF AUDITOR

62. AUDITOR SIGNATURE AND DATE

Foreign Establishment Audit Checklist

1 ESTABLISHMENT NAME AND LOCATION Gourmet Supplies NZ Ltd. Hornby, Christchurch	2 AUDIT DATE 04-16-02	3 ESTABLISHMENT NO PH 504	4 NAME OF COUNTRY New Zealand
5. NAME OF AUDITOR(S) Dr.S.Singh		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.		37. Import	
12. Corrective action when the SSOPs 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	
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/AQU 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

New Zealand-Establishment No. PH-504

Audit Date 04-16-02

38=Used equipment and other metal was stored closed to wall of the establishment-potential for rodent harboring.

61. NAME OF AUDITOR

S. P. Singh

62. AUDITOR SIGNATURE AND DATE

Foreign Establishment Audit Checklist

1 ESTABLISHMENT NAME AND LOCATION The Canterbury Frozen Meat Belfast, Christchurch	2 AUDIT DATE 04-17-02	3 ESTABLISHMENT NO ME-15	4 NAME OF COUNTRY NEW ZEALAND
5 NAME OF AUDITOR(S) Dr.S.Singh		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.		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.	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	
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

New Zealand-Establishment No.ME-15

Audit Date: 04-17-02

15= HACCP= There was no CCP for fecal contamination in slaughter area in the HACCP plan.

61. NAME OF AUDITOR
S. P. Singh

62. AUDITOR SIGNATURE AND DATE

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Dairy Meat Ltd. Avondale, Auckland	2. AUDIT DATE 04-18-02	3. ESTABLISHMENT NO PH-490	4. NAME OF COUNTRY New Zealand
5. NAME OF AUDITOR(S) Dr. S. Singh		<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	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	
24. Labeling - Net Weights		52. Humane Handling	O
25. General Labeling		53. Animal Identification	O
26. Fin. Prod. Standards/Boneless (Defects/AQUAPak 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

New Zealand Establishment No. PH 4 90

Audit Date: 04-18=2002

47=Boot washing facility is located inside boning room. Chemical used in boot washing was not food grade chemical according to NZ requirements. Potential contamination of edible product by aerosol.

61. NAME OF AUDITOR

S.P.Singh

62. AUDITOR SIGNATURE AND DATE

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION AFFCO-WAIROA	2. AUDIT DATE 04-22-02	3. ESTABLISHMENT NO ME-42	4. NAME OF COUNTRY NEW ZEALAND
5. NAME OF AUDITOR(S) Dr.S.Singh		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.	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.	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	
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	
24. Labeling - Net Weights		52. Humane Handling	
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQU/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

New Zealand Establishment No.ME-42

Audit Date: 04-22-2002

10. The floor of the boning room was not being cleaned often resulting in an accumulation of inedible product all over the floor. Cross contamination of beef carcasses from the cooler door was observed.

13=Corrective actions were not recorded daily.

15=Hazard Analysis did not include fecal Contamination. This is controlled by Tech.Directive.

46= Peeling paint observed in beef boning room; and In numerous locations motors for conveyor belts were installed above the belt without any bottom tray or cover creating a potential source of contamination of products.

61. NAME OF AUDITOR

S. P. Singh

62. AUDITOR SIGNATURE AND DATE

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION
Manawatu Beef Packers
AFFCO,
Palmerston North

2. AUDIT DATE
04-24-02

3. ESTABLISHMENT NO.
ME-32

4. NAME OF COUNTRY
NEW ZEALAND

5. NAME OF AUDITOR(S)
Dr.S.Singh

6. TYPE OF AUDIT
 ON-SITE AUDIT DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

	Audit Results		Audit Results
Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements		Part D - Continued Economic Sampling	
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.		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.	X	47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
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	
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

New Zealand-Establishment No. ME-32

Audit Date: 04-24-2002

19/21= HACCP=Verification of monitoring of CCP on daily basis were not done. Validation of CCP and Reassessment of HACCP was not completed.

61. NAME OF AUDITOR

62. AUDITOR SIGNATURE AND DATE

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Riverlands Manawatu Ltd. Bulls	2. AUDIT DATE 04-26-02	3. ESTABLISHMENT NO ME-119	4. NAME OF COUNTRY NEW ZEALAND
	5. NAME OF AUDITOR(S) Dr.S.P.Singh		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.		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/AQU/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	X
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

New Zealand-Establishment No.ME-119

Audit Date: 04-26-2002

59=Monthly Supervision was on PBV based-in this case establishment was visited once 2 or 3 months.

61. NAME OF AUDITOR

62. AUDITOR SIGNATURE AND DATE

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Canterbury Meat Packers Ltd. Blenheim	2. AUDIT DATE 04-29-02	3. ESTABLISHMENT NO. ME-70	4. NAME OF COUNTRY NEW Zealand
5. NAME OF AUDITOR(S) Dr.S.P.Singh		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.		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.	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	
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.	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	
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

New Zealand –Establishment No. ME-70

Audit Date: 04-29-2002

15=The establishment has identified four critical control points in the HACCP plan and fecal Contamination (Zero-Tolerance) was not mentioned and this hazard is controlled by Technical Directives and GMP.

21=No reassessment of HACCP was done-but changes were made.

16=CCPs monitoring frequencies were not included in the HACCP plan, but refereed to SOPS.

61. NAME OF AUDITOR

62. AUDITOR SIGNATURE AND DATE

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Taylor Preston Limited Wellington, New Zealand	2. AUDIT DATE 04-30-02	3. ESTABLISHMENT NO. ME-86	4. NAME OF COUNTRY New Zealand
5. NAME OF AUDITOR(S) S.P.Singh		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.		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.	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	
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.	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	
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/AQU/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

New Zealand-Establishment No.ME-86

Audit Date:04-30-2002

13=Corrective actions in the check-sheet of Pre-operation Sanitation were not described properly.

15= HACCP-did not mention CCP of fecal contamination. It was controlled by GMP in sheep slaughter process.

21= No reassessment of HACCP done in three years.

61. NAME OF AUDITOR

62. AUDITOR SIGNATURE AND DATE

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Richmond Pacific Whakatu Hastings	2. AUDIT DATE 04-23-02	3. ESTABLISHMENT NO. ME-52	4. NAME OF COUNTRY NEW ZEALAND 6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT
5. NAME OF AUDITOR(S) Dr.S.Singh			

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.		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/AQU/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

New Zealand-Establishment No. ME-52

Audit Date:04-23-2002

61. NAME OF AUDITOR

S. P. Singh

62. AUDITOR SIGNATURE AND DATE

Ref: M-USA000

5 November 2002

Sally Stratmoen
Chief, Equivalence Section
International Policy Staff
Office of Policy, Program Development and Evaluation
Food Safety Inspection Service, US Department of Agriculture
Room 4434- South
1400 Independence Avenue, SW
Washington D.C. 2050 - 3700
UNITED STATES OF AMERICA

Dear Sally

**Draft Final Audit Report for New Zealand
April 3 Through April 30, 2002**

Thank you for the opportunity to provide comment on the Draft Final Audit Report.

New Zealand considers the report to overall be a true reflection of the findings of this audit. Issues identified at individual establishments were either addressed at the time of the audit or subsequently.

With regard to the HACCP findings New Zealand is working with industry and the MAF Verification Agency on initiatives which include a revision of the Unit Standard for the assessment of competency of HACCP Co-ordinators, and the ongoing skill maintenance of these people. Other strategies are also being formulated which will allow the NZ Food Safety Authority to measure the adequacy and understanding with regard to HACCP Implementation at establishment level.

Appended as Appendix I are comments we wish to make in relation specific points made in the Draft Final Audit report itself.

Yours sincerely

Dr Tony Zohrab
Director (Animal Products)

NZFSA Comment on the Draft Final Audit Report

3 April to 30 April 2002

Results and Discussion

Headquarters Audit (Page 4)

- Corrective and preventive actions recording. These are clear non-compliances with requirements issued by NZ Food Safety Authority (NZFSA). Resolution has occurred.
- Flow charts did not include all process steps. At the time of the paper based audit of HACCP plans the auditor was provided with HACCP Plan Summary Sheets and not necessarily the flow charts in some instances. Since the audit MAF Verification Agency (MAF VA) has carried out reviews to ensure that flow charts are in fact in place. This has largely proven to be the case. Where any deficiency has subsequently been identified it has been corrected and verified by MAF VA.
- "Faecal contamination" not included in hazard analysis. NZFSA does not consider faecal contamination to be a hazard, it is a source of food safety hazards. Enteric pathogens from the gastrointestinal tract, hide/wool and skin should have been mentioned in the hazard identification and analysis. (See further comments below under *HACCP Implementation*.)
- No critical control points specified (CCPs). At FSIS request subsequent to the 2001 FSIS audit, NZFSA has mandated at least one CCP and hence a HACCP plan into each US listed premises. Refer to OMAR 02/025 (appended), which required implementation by 30 June 2002.
- Critical limits were not measurable in three establishments. NZFSA agrees that they should be measurable. MAF VA has since verified that where any deficiencies were identified remedial action has been taken. It would appear that HACCP Co-ordinators were generally not present during the audits and other staff present were not able to provide

explanations in this regard that would satisfy the auditors enquiry.

No pre-shipment document reviews in three establishments.

The three premises identified in the audit report were the subject of the paper-based audit at headquarters. As the HACCP plan and such records are not held at headquarters, material was faxed in at the time of the audit to allow the auditor to perform his paper-based audit.

Subsequent checking by MAF VA has indicated that records were available at the premises concerned, but had not been faxed in for the auditor to examine. However, should any such instances be found at any time whether by MAF VA, CIG auditors or by an FSIS auditor NZFSA would regard it as a clear non-compliance.

Government Oversight

First paragraph, last sentence.

This should read: " ASURE is a State Owned Enterprise of the Ministry of State Enterprises which provides inspection services on behalf of MAF FAA." MAF FAA has previously provided FSIS with a considerable amount of information with regard to this relationship and awaits further response.

Sanitation Controls

Sanitation Standard Operating Procedures.

MAF VA has subsequently verified that corrective and preventive actions are now being properly recorded in the four establishments identified by the auditor.

Animal Disease Controls

Controls of condemned material were lacking at ME 117

This non-compliance which had been the subject of a key issue at a previous CIG audit led to suspension of certification for exports to the USA until MAF VA provided an assurance that all aspects of this programme were fully compliant. NZFSA was

disturbed at such a finding of a key FSIS requirement.

Slaughter/Processing Controls

The deficiencies noted at the three identified establishments have since been verified as being in compliance by MAF VA.

HACCP Implementation

Flow charts without all process steps included. See early comments in Headquarters Audit section above.

"Faecal contamination" not included in hazard analysis.

See early comments in Headquarters Audit section above.

NZFSA has historically provided an option as to whether Zero Faecal Tolerance (ZFT) is included as part of a HACCP plan or is operated outside it. The auditor acknowledged that ZFT was being managed to his satisfaction in all instances and that the outcomes were satisfactory.

No pre-shipment reviews in three establishments.

See early comments in Headquarters Audit section above.

Verification, validation and reassessment of HACCP plans.

NZFSA is requesting that industry revisit their HACCP plans to ensure that:

- 1) their HACCP plans continue to be relevant
- 2) accurate records are available to support all aspects of verification, including validation and any HACCP plan reassessment.

ENFORCEMENT CONTROLS

Testing for Salmonella Species

Correction under 1.SAMPLE COLLECTOR:

The reference to MILAB being a non-Government accreditation authority is incorrect. MILAB is now administered within NZFSA. Under the MILAB Scheme laboratory International Accreditation New Zealand accredits laboratories in accordance with ISO standards.

Please note that the same statement in relation to MILAB is made under 2 LABORATORIES on page 10.

Enforcement Activities

Prosecutions.

The legal references should be to the Meat Act 1981 and the Animal Products Act 1999.

Exit Meetings

Corrections:

Change Dr.Goeff Allen to Dr. Geoff Allen, Mr Niel Kiddey to Mr Neil Kiddey, Ms Judi Lee to Dr. Judi Lee, Programme Manager (Programme Development).

Add Dr John Lee, Programme Manager (Market Access).

Last paragraph on page 11.

The first sentence should read: "Assurances were given by New Zealand Officials to address deficiencies noted on the basis that outstanding issues such as ASURE and those noted in this Appendix would be the subject of further dialogue between FSIS and MAF FAA.

Please note: At the time of writing MAF FAA has been incorporated into the New Zealand Food Safety Authority and continues to fulfil the role of competent authority).