



United States  
Department of  
Agriculture

Food Safety  
and Inspection  
Service

Washington, D.C.  
20250

Mr. Robert M. Houston  
Chief Veterinary Officer  
Department of Agriculture and Rural Development  
Veterinary Service  
Dundonald House, Upper Newtownards Road  
Belfast BT4 3SB  
Northern Ireland

Dear Mr. Houston:

Enclosed is the final report of the Food Safety and Inspection Service (FSIS) on-site audit of Northern Ireland's meat inspection system. This audit was conducted April 20 through May 4, 2004. Comments received from the government of Northern Ireland have been included as an attachment to the final report.

If you have any questions regarding the FSIS audit or the final audit report, please contact me at telephone number (202) 720-3781, facsimile number (202) 690-4040, or by email at (Sally.white@fsis.usda.gov).

Sincerely,

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

Sally White  
Director, International Equivalence Staff  
Office of International Affairs

Enclosure

cc.

Peter Kurz, Minister Counselor, American Embassy, London

James Hughes, First Secretary, Agriculture and Trade Policy, British Embassy, Wash DC

Tony Van der haegen, Agric. / Consumer Affairs, EU Mission to the U.S., Wash, DC

Norval Francis, Minister-Counselor, US Mission to the EU in Brussels

Scott Bleggi, FAS Area Director

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Clark Danford, Director, IEPS, OIA, FSIS

Steve McDermott, IES, OIA, FSIS

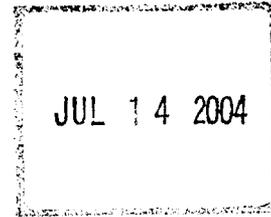
Mary Stanley, Director, IID, OIA, FSIS

Country File (FY 2004 Audit)

FSIS:OIA:IES:SMCDERMOTT:690-0297:7/30/04:

*SM*

**FINAL**



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

APRIL 20 THROUGH MAY 4, 2004

Food Safety and Inspection Service  
United States Department of Agriculture

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## ABBREVIATIONS AND SPECIAL TERMS USED IN THE REPORT

CCA	Central Competent Authority (Department of Agriculture and Rural Development – DARD)
DARD	Department of Agriculture and Rural Development
FSA	Food Standards Agency
CVO	Chief Veterinary Officer
DCVO	Deputy Chief Veterinary Officer
OVS	Official Veterinary Surgeon
TVO	Temporary Veterinary Official
SMI	Senior Meat Inspector
MI	Meat Inspector
NIFSG	Northern Ireland Food Safety Group
NIFLEG	Northern Ireland Food Law Enforcement Group
FSIS	Food Safety and Inspection Service
VEA	European Community/United States Veterinary Equivalence Agreement
PR/HACCP	Pathogen Reduction/Hazard Analysis and Critical Control Point System
SSOP	Sanitation Standard Operating Procedures
<i>E. coli</i>	<i>Escherichia coli</i>
<i>Salmonella</i>	<i>Salmonella</i> species

## 1. INTRODUCTION

The audit took place in Northern Ireland from April 20 to May 4, 2004.

An opening meeting was held on April 20, 2004 in Belfast with the Central Competent Authority (CCA). At this meeting, the audit team confirmed the objective and scope of the audit, the audit team's itinerary, and requested additional information needed to complete the audit of Northern Ireland's meat inspection system.

The audit team was accompanied during the entire audit by a representative from the Department of Agriculture and Rural Development (DARD) and, when appropriate, representatives from the regional and local inspection/establishment offices.

## 2. OBJECTIVE OF THE AUDIT

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

In pursuit of the objective, the following sites were visited: the headquarters of the CCA, two regional inspection offices, three laboratories performing analytical testing on U.S. destined product, one swine slaughter/processing establishment, and one cold storage facility.

<b>Competent Authority Visits</b>			<b>Comments</b>
Competent Authority	Central	1	DARD in Belfast
	Regional	2	North Region and South Region
	Local	2	Establishment Level
Laboratories		3	
Meat Slaughter/Processing Establishments		1	
Cold Storage Facilities		1	

## 3. PROTOCOL

This on-site audit was conducted in four parts. One part involved visits with CCA and Food Standards Agency (FSA) officials to discuss oversight programs and practices, including enforcement activities. The second part involved an audit of a selection of records in the country's inspection headquarters and regional offices. The third part involved on-site visits to two establishments: one swine slaughter/processing establishment and one cold storage facility. The fourth part involved visits to three government laboratories. The DARD Food Microbiology Food Science Division was conducting analyses of field samples for the presence of *Salmonella*. The DARD Food Services Division, Food Chemistry Analytical Unit and DARD Veterinary Services

Division, Chemical Services Department Laboratories were conducting analyses of field samples for Northern Ireland's national residue control program.

Generic *E. coli* sampling was being conducted by a private laboratory in Ireland. This laboratory was not included in this audit.

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

During all on-site establishment visits, the audit team evaluated the nature, extent and degree to which findings impacted on food safety and public health. The audit team also assessed how meat inspection services are carried out by Northern Ireland and determined if establishment and inspection system controls were in place to ensure the production and distribution of meat products as imports into the United States are safe, unadulterated and properly labeled.

At the opening meeting, the audit team explained to the CCA that their inspection system would be audited in accordance with three areas of focus. First, under provisions of the VEA, the FSIS audit team would audit Northern Ireland's meat inspection system against European Community (EC) Directive 64/433 of June 1964; EC Directive 96/22 of April 1996; and EC Directive 96/23 of April 1996. These directives have been declared equivalent by FSIS under the VEA.

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

Third, the audit team would audit against any equivalence determinations that have been made by FSIS for Northern Ireland under provisions of the Sanitary and Phytosanitary Agreement. Accordingly, DARD had previously advised FSIS that they have adopted the FSIS regulatory requirements for HACCP and SSOP programs and *Salmonella*/generic *E. coli* laboratory testing.

#### 4. LEGAL BASIS FOR THE AUDIT

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

- The Federal Meat Inspection Act (21 U.S.C. 601 et seq.).

- The Federal Meat Inspection Regulations (9 CFR Parts 301 to end), which include the U.S. import requirements listed in 9 CFR 327 and the Pathogen Reduction/HACCP and SSOP regulations.

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

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

## 5. SUMMARY OF PREVIOUS AUDITS

Final audit reports are available on FSIS' website at the following address:

[http://www.fsis.usda.gov/Regulations\\_&\\_Policies/Foreign\\_Audit\\_Reports/index.asp](http://www.fsis.usda.gov/Regulations_&_Policies/Foreign_Audit_Reports/index.asp)

No establishments were certified for export to the United States at the time of the November 2001 audit. The audit was limited to visits to laboratories conducting residue and microbiology testing of meat products destined for the United States. The following deficiencies were identified:

- No intra-laboratory check samples being performed in the hormone section of the Veterinary Services Laboratory.
- There were insufficient turnaround times in the Food Chemistry Analytical Unit Laboratory regarding obtaining results for chlorinated hydrocarbons and organophosphates.
- Expired standards were being used in the Food Chemistry Analytical Unit Laboratory.

No establishments were certified for export to the United States at the time of the August 2002 audit. At the request of DARD, FSIS conducted a special audit consisting solely of reviewing establishment UK 9014, which was not certified to export to the United States. During the previous two FSIS audits, UK 9014 was rated as acceptable/re-review in May 2000 and was delisted by DARD immediately prior to the November 2001 audit. The following deficiencies were identified during the August 2002 audit:

- SSOP documents did not accurately reflect the conditions of the establishment.
- SSOP documents were not descriptive enough for some deficiencies and did not include preventive measures as part of the corrective action records.
- HACCP plan and implementation did not contain some of the requirements for verification, corrective action, and pre-shipment review.
- Inadequate maintenance of doors to outside premises, rusty fan over boning table, and a conveyor belt in poor condition.
- Inedible product was not denatured and properly stored.

- No timely response to correct the deficiencies by establishment personnel.
- Enforcement controls by inspection service did not meet FSIS requirements.

The following deficiencies were identified during the FSIS audit of Northern Ireland's meat inspection system conducted in July 2003.

- In the slaughter establishment, the inspection officials were monitoring/verifying the adequacy and effectiveness of the pre-operational sanitation once a week and operational sanitation twice a week. This frequency does not meet FSIS requirements. DARD officials indicated that they would immediately comply with this FSIS requirement.
- The sequence of swine carcass sponging for generic *E. coli* was not being followed as required: ham, belly and jowl. Instead, the sequence being used was belly, ham and jowl. Accordingly, FSIS Directive 5000.1, Attachment 1, and 9 CFR 310.25(a)(2)(ii)(c) were not adequately met. This deficiency was the result of a misunderstanding of the *E. coli* sample collection requirements due to referencing a different FSIS document. Establishment officials took corrective action immediately.
- The sequence of swine carcass sponging for *Salmonella* was not being followed as required: ham, belly and jowl. Instead, the sequence being used was belly, ham and jowl. Accordingly, FSIS Directive 5000.1, Attachment 1, and 9 CFR 310.25(a)(2)(ii)(c) were not adequately met. This deficiency was the result of a misunderstanding of the *Salmonella* sample collection requirements due to referencing a different FSIS document. DARD inspection officials took corrective action immediately.
- Turnaround times of test results for chlorinated hydrocarbons and organophosphates ranged between 25 to 40 days.
- Documentation of corrective actions was provided, but there was very little formal written description of actions to be taken in the event that an analyst's performance did not meet expected standards for chlorinated hydrocarbons, organophosphates and trace elements.
- Northern Ireland had initially advised FSIS that it had adopted the FSIS laboratory testing methods for *Salmonella*. However, DARD had changed the laboratory testing method without submitting it to FSIS for equivalence review. DARD submitted the alternative method to FSIS for equivalence determination.

## 6. MAIN FINDINGS

### 6.1. Legislation

The audit team was informed that the relevant EC Directives, determined equivalent under the VEA, had been transposed into Northern Ireland's legislation.

### 6.2. Government Oversight

Northern Ireland's meat inspection system is primarily administered by the Veterinary Service Group, an agency within DARD. In addition, the Northern Ireland meat inspection system is under the auspices of the FSA, an agency within the United

Kingdom's parliament, which was established in 2000 to provide food safety oversight for both Great Britain and Northern Ireland. FSA has an office in Belfast and works closely with DARD.

The responsibility of government oversight relative to meat exports to the United States is shared with two other agencies within DARD with regard to residues and food safety policy. These agencies are the Science Service Group and the Central Policy Group.

The Veterinary Service Group employs approximately 137 veterinarians, 145 meat inspectors and 204 animal health and welfare inspectors to carry out the responsibility of its domestic and export meat inspection programs including related enforcement activities. All inspection personnel assigned to establishments certified to export meat to the United States are full-time government employees receiving no remuneration from either industry or establishment personnel. Inspection personnel cannot attain outside employment.

#### 6.2.1 CCA Control Systems

The Veterinary Service is headed by a Chief Veterinary Officer (CVO) and two Deputy CVOs. Together, with the assistance of several veterinary staff officers assigned to headquarters, they provide direct oversight of two regional offices (North Regional Office and South Regional Office). Relative to meat exports to the United States, each regional office is headed by a supervisory divisional veterinary officer (circuit supervisor), who provides direct authority over official veterinarians and inspectors assigned to establishments certified to export meat to the United States. The Veterinary Service also has authority over live animal matters in Northern Ireland relative to movement controls and livestock diseases.

#### 6.2.2 Ultimate Control And Supervision

The senior Official Veterinary Surgeon (OVS) has the authority to suspend the establishment's production operations any time the wholesomeness and safety of the product is jeopardized. He/she reports directly to their circuit supervisor and consults all decisions regarding enforcement activities. The decision as to whether the establishment is failing to meet U.S. import requirements and the recommendation that it should be delisted is a combined effort of the OVS, regional supervisor, and headquarters officials. The CVO will make the ultimate decision and will advise FSA authorities.

The senior OVS has direct supervision over all other inspection personnel assigned to certified establishments. This would include supervision over veterinary officers, senior meat inspectors, and meat inspectors. For the two establishments certified to export meat to the United States, the Veterinary Service Group has placed a sufficient number of official inspection personnel to adequately carry out the U.S. import requirements.

#### 6.2.3 Assignment of Competent, Qualified Inspection Personnel

All inspection personnel assigned to certified establishments undergo induction training as well as participate in on-the-job practical training under the supervision of experienced

veterinarians. Continual training is provided for all inspection personnel as needed. The Veterinary Service Training Branch maintains individual training records of inspection personnel.

The majority of the meat inspectors have received the meat hygiene inspector's diploma from the Royal College of Veterinary Surgeons. All official veterinarians are qualified veterinarians who have obtained their college veterinary degree.

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

Veterinary officers and meat inspectors are authorized to enforce EU legislation and U.S. import requirements including animal health and welfare, control of animal disease, veterinary medicines, and the production of safe foods of animal origin. Through legal process in the courts, DARD, with the assistance of FSA, has the authority to suspend and delist certified establishments to prevent the export of unsafe meat to the United States.

#### 6.2.5 Adequate Administrative and Technical Support

During this audit, the FSIS audit team determined that the CCA has administrative and technical support to operate Northern Ireland's meat inspection system and has resources and the capability to support a third-party audit. DARD demonstrated an adequate amount of supervisory oversight to ensure compliance with U.S. import requirements.

### 6.3 Headquarters Audit

The audit team conducted a review of Northern Ireland meat inspection system documents at DARD headquarters in Belfast. In addition, the audit team reviewed meat inspection records at the two DARD regional offices and the three government laboratories. The records' review focused primarily on food safety controls relative to meat exports to the United States. This included the following:

- Internal audit reports.
- Supervisory visits to establishments that were certified to export to the U.S.
- Training records for inspectors and laboratory personnel.
- Applicable laws and implementation documents such as regulations, notices, directives and guidelines.
- Sampling and laboratory analyses for residues and *Salmonella*.
- Sanitation, slaughter and processing inspection procedures and standards.
- Export product inspection and control including export certificates.
- Enforcement records including examples corrective action reports, consumer complaints, recalls, seizure and control of noncompliant product, and withholding, suspending, withdrawing inspection services from or delisting an establishment that is certified to export meat products to the United States.

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

### 6.3.1 Audit of Regional Offices

The FSIS audit team reviewed Northern Ireland's meat inspection records at DARD's two regional offices: the North Regional Office in Coleraine and the South Regional Office in Newry. The audit team interviewed the Circuit Supervisor of the North office and the Circuit Supervisor of the South office.

The purpose of the interviews was to review the meat inspection records and determine the level of government oversight and control provided by the regional offices relative to the certified establishments.

The audit team concluded that:

- All relevant regulations, notices, and other inspection documents and records were adequately disseminated from headquarters through the regional offices to the two certified establishments (local inspection sites). This was accomplished by both hard copy and e-mails.
- Copies of all relevant regulations, notices, and other inspection documents and records were maintained at the regional offices.
- Both circuit supervisors were knowledgeable of U.S. import requirements relative to the two certified establishments producing or exporting meat to the United States.
- Both regional offices demonstrated adequate administrative assistance to ensure that official inspection personnel were assigned to the two certified establishments.

#### Local Inspection Sites (Certified Establishments)

The FSIS audit team reviewed Northern Ireland's meat inspection records maintained at the local inspection sites certified to produce or export meat to the United States. In addition, the audit team interviewed the senior veterinarians (OVS) at each establishment and their inspection teams, which consisted of veterinary officers, senior meat inspectors and meat inspectors.

The audit team concluded that:

- All relevant regulations, notices, and other inspection documents and records were adequately disseminated from headquarters through the regional offices to the two local inspection sites). This was accomplished by both hard copy and e-mails.
- Inspection personnel demonstrated adequate knowledge of inspection requirements relative to the export and distribution of meat to the United States.

## 7. ESTABLISHMENT AUDITS

The FSIS audit team visited a total of two establishments; one was a swine slaughter/processing establishment and the other was a cold storage facility. No establishments were delisted by DARD and no establishments received a Notice of Intent to Delist (NOID) from DARD.

Specific deficiencies are noted on the attached individual establishment reports.

## 8. RESIDUE AND MICROBIOLOGY LABORATORY AUDITS

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

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

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

The slaughter certified establishment uses a private laboratory Eclipse Scientific Group, Independent Micro Laboratory in Portlaoise in Ireland to perform testing for *generic E. coli*. This laboratory was not reviewed by the audit team.

The following laboratories were reviewed:

- The DARD Food Science Division, Chemistry Analytical Unit is a government laboratory located in Belfast (Newforge), which conducts analyses of field samples for Northern Ireland's national residue program. This laboratory has received ISO Standard 17025 accreditation.
- The DARD Veterinary Services Division Laboratory is a government laboratory located in Belfast (Stormont), which conducts analyses of field samples for Northern Ireland's national residue program. This laboratory is undergoing the process to receive ISO Standard 17025 accreditation
- The DARD Food Science Division, Microbiology Division Unit is a government laboratory located in Belfast (Newforge), which conducts analyses of field samples for the presence of *Salmonella*.

The findings at the DARD Food Chemistry Analytical Unit laboratory and DARD Food Microbiology Food Science Division laboratory will be discussed in Section 12 (Residue Controls). No deficiencies were noted in the DARD Veterinary Services Division Laboratory.

## 9. SANITATION CONTROLS

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

Except as noted below, Northern Ireland's inspection system had controls in place for SSOP programs, all aspects of facility and equipment sanitation, the prevention of actual or potential instances of product cross-contamination, good personal hygiene and practices, and good product handling and storage practices.

In addition, Northern Ireland's inspection system had controls in place for water potability records, chlorination procedures, back-siphonage prevention, separation of operations, temperature control, work space, ventilation, ante-mortem facilities, welfare facilities, and outside premises.

### 9.1 SSOP

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOP were met, according to the criteria employed in the U.S. domestic inspection program. The SSOP in the both establishments were found to meet the basic FSIS regulatory requirements.

### 9.2 EC Directive 64/433

In all establishments, the provisions of EC Directive 64/433 were effectively implemented. Specific deficiencies, if applicable, are noted in the attached individual establishment reports.

## 10. ANIMAL DISEASE CONTROLS

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

There had been no outbreaks of animal diseases with public health significance since the last FSIS audit. APHIS continues to have import restrictions on beef products from Northern Ireland due to the presence of BSE, and special import restrictions on pork products regarding Rinderpest and Swine Vesicular Disease.

## 11. SLAUGHTER/PROCESSING CONTROLS

The third of the five risk areas that the FSIS audit team reviewed was Slaughter/Processing Controls. The controls include the following areas: ante-mortem inspection procedures, ante-mortem disposition, humane handling and humane slaughter, post-mortem inspection procedures, post-mortem disposition, ingredients identification,

control of restricted ingredients, formulations, processing schedules, equipment and records.

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

#### 11.1 Humane Handling and Humane Slaughter

No deficiencies were noted.

#### 11.2 HACCP Implementation

Non-cold storage establishments certified to export meat products to the United States are required to have adequately developed and implemented a HACCP program. The HACCP program was evaluated according to the criteria employed in the U.S. domestic inspection program.

During this audit, the one establishment that was required to meet the HACCP programs requirements had adequately implemented the HACCP requirements.

#### 11.3 Testing for Generic *E. coli*

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

Only one of the two establishments audited was required to meet the basic FSIS regulatory requirements for testing for generic *E. coli* and was evaluated according to the criteria employed in the U.S. domestic inspection program.

FSIS findings concluded that testing for generic *E. coli* was properly conducted in the one establishment (swine slaughter).

#### 11.4 Testing for *Listeria monocytogenes*

Both establishments audited were not producing ready-to-eat products for export to the United States and therefore were not required to meet the FSIS requirements for *Listeria monocytogenes* testing.

#### 11.5 EC Directive 64/433

In both establishments, the provisions of EC Directive 64/433 were effectively implemented.

### 12. RESIDUE CONTROLS

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

The DARD Food Science Division, Chemistry Analytical Unit is a government laboratory, located in Belfast (Newforge). No deficiencies were noted.

The DARD Veterinary Services Division Laboratory is a government laboratory, located in Belfast (Stormont). No deficiencies were noted.

Northern Ireland's National Residue Control Program for 2004 was being followed as scheduled.

The findings of DARD Food Microbiology Food Science Division laboratory will be discussed in Section 13 (Enforcement Controls).

#### 12.1 EC Directive 96/22

In the DARD Food Chemistry Analytical Unit laboratory and the DARD Veterinary Services Division Laboratory, the provisions of EC Directive 96/22 were effectively implemented.

#### 12.2 EC Directive 96/23

In the DARD Food Chemistry Analytical Unit laboratory and the DARD Veterinary Services Division Laboratory, the provisions of EC Directive 96/23 were effectively implemented.

### 13. ENFORCEMENT CONTROLS

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

#### 13.1 Daily Inspection in Establishments

Inspection was being conducted daily in both certified establishments.

#### 13.2 Testing for *Salmonella*

Northern Ireland has adopted the FSIS regulatory requirements for testing for *Salmonella*. One of the two establishments audited was required to meet the basic FSIS regulatory requirements for *Salmonella* testing and was evaluated according to the criteria employed in the U.S. domestic inspection program. The following deficiency was noted:

- DARD submitted the alternate Method NF 11 that they are using to analyze *Salmonella* samples to FSIS for equivalence determination and FSIS is currently reviewing the Northern Ireland equivalence determination request.

### 13.3 Species Verification

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

### 13.4 Monthly Reviews

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

### 13.5 Inspection System Controls

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

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

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

## 14. CLOSING MEETING

A closing meeting was held on May 4, 2004, in Belfast with the CCA and by teleconference with a member of the European Community in Brussels, Belgium. At this meeting, the primary findings and conclusions from the audit were presented by the audit team.

The CCA understood and accepted the findings.

 Faizur R. Choudry  
International Audit Staff Officer



## 15. ATTACHMENTS TO THE AUDIT REPORT

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

REVIEW DATE

NAME OF FOREIGN LABORATORY

FOREIGN COUNTRY LABORATORY REVIEW

04/26/04

Chemical Surveillance Department  
 Veterinary Science Division

FOREIGN GOV'T AGENCY  
 Department of Agriculture and Rural  
 Development

CITY & COUNTRY  
 Stormont (Belfast),  
 Northern Ireland

ADDRESS OF LABORATORY  
 Belfast BT4 3 SD  
 Northern Ireland

NAME OF REVIEWER  
 Dr. Faizur Choudry & Dr. M. Chaudry

NAME OF FOREIGN OFFICIAL  
 Dr. Robert Huge & Dr. Glenn Kennedy, Head of Chemical Surveillance Department

Residue Code/Name



200 203 500 501 800 900 907 923

REVIEW ITEMS	ITEM #	EVALUATION CODE	200	203	500	501	800	900	907	923				
			SAMPLING PROCEDURES											
Sample Handling	01	A	A	A	A	A	A	A	A	A				
Sampling Frequency	02	A	A	A	A	A	A	A	A	A				
Timely Analyses	03	A	A	A	A	A	A	A	A	A				
Compositing Procedure	04	O	O	O	O	O	O	O	O	O				
Interpret Comp Data	05	O	O	O	O	O	O	O	O	O				
Data Reporting	06	A	A	A	A	A	A	A	A	A				
ANALYTICAL PROCEDURES														
Acceptable Method	07	A	A	A	A	A	A	A	A	A				
Correct Tissue(s)	08	A	A	A	A	A	A	A	A	A				
Equipment Operation	09	A	A	A	A	A	A	A	A	A				
Instrument Printouts	10	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				
Recovery Frequency	12	A	A	A	A	A	A	A	A	A				
Percent Recovery	13	A	A	A	A	A	A	A	A	A				
Check Sample Frequency	14	A	A	A	A	A	A	A	A	A				
All analyst w/Check Samples	15	A	A	A	A	A	A	A	A	A				
Corrective Actions	16	A	A	A	A	A	A	A	A	A				
International Check Samples	17	A	A	A	A	A	A	A	A	A				
REVIEW														
Corrected Prior Deficiencies	18	A	A	A	A	A	A	A	A	A				
OTHER REVIEW														
	19													
	20													

SIGNATURE OF REVIEWER

*Dr. Faizur Choudry*

DATE

05/06/04



REVIEW DATE  
 04/27/04

NAME OF FOREIGN LABORATORY  
 DARDNI Food Science Division

FOREIGN COUNTRY LABORATORY REVIEW

FOREIGN GOV'T AGENCY  
 Department of Agriculture and Rural  
 Development

CITY & COUNTRY  
 Belfast, Northern Ireland

ADDRESS OF LABORATORY  
 Newforge Lane, Belfast BT9 5PX

NAME OF REVIEWER  
 Dr. F. Choudry & Dr. M. Chaudry

NAME OF FOREIGN OFFICIAL  
 Dr. Robert Huey

Residue Code/Name		100	300	400															
SAMPLING PROCEDURES	REVIEW ITEMS	ITEM #	EVALUATION CODE																
	Sample Handling	01	A	A	A														
	Sampling Frequency	02	A	A	A														
	Timely Analyses	03	A	A	A														
	Compositing Procedure	04	O	O	O														
	Interpret Comp Data	05	O	O	O														
Data Reporting	06	A	A	A															
ANALYTICAL PROCEDURES	Acceptable Method	07	A	A	A														
	Correct Tissue(s)	08	A	A	A														
	Equipment Operation	09	A	A	A														
	Instrument Printouts	10	A	A	A														
QUALITY ASSURANCE PROCEDURES	Minimum Detection Levels	11	A	A	A														
	Recovery Frequency	12	A	A	A														
	Percent Recovery	13	A	A	A														
	Check Sample Frequency	14	A	A	A														
	All analyst w/Check Samples	15	A	A	A														
	Corrective Actions	16	A	A	A														
	International Check Samples	17	A	A	A														
REVIEW	Corrected Prior Deficiencies	18	A	A	A														
OTHER REVIEW		19																	
		20																	

SIGNATURE OF REVIEWER

DATE

FOREIGN COUNTRY LABORATORY REVIEW

*(Comment Sheet)*

REVIEW DATE

04/27/04

NAME OF FOREIGN LABORATORY

DARDNI Food Science Division

FOREIGN GOV'T AGENCY

Department of Agriculture and Rural  
Development

CITY & COUNTRY

Belfast, Northern Ireland

ADDRESS OF LABORATORY

Newforge Lane, Belfast BT9 5PX

NAME OF REVIEWER

Dr. F. Choudry & Dr. M. Chaudry

NAME OF FOREIGN OFFICIAL

Dr. Robert Huey

RESIDUE

ITEM NO.

COMMENTS

REVIEW DATE  
 04/27/04

NAME OF FOREIGN LABORATORY  
 DARDNI Food Microbiology Food Science Division

FOREIGN COUNTRY LABORATORY REVIEW

FOREIGN GOV'T AGENCY  
 Department of Agriculture and Rural  
 Development (DARD)

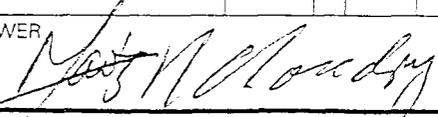
CITY & COUNTRY  
 Belfast, Northern Ireland

ADDRESS OF LABORATORY  
 Newforge Lane, Belfast BT9 5PX

NAME OF REVIEWER  
 Dr. F. Choudry & Dr. M. Chaudry

NAME OF FOREIGN OFFICIAL  
 Dr. Robert Huge & Dr. S. NEIL

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

SIGNATURE OF REVIEWER  


DATE  
 05/06/04

<b>FOREIGN COUNTRY LABORATORY REVIEW</b> <i>(Comment Sheet)</i>		REVIEW DATE 04/27/04	NAME OF FOREIGN LABORATORY DARDNI Food Microbiology Food Science Division
FOREIGN GOV'T AGENCY Department of Agriculture and Rural Development (DARD)		CITY & COUNTRY Belfast, Northern Ireland	ADDRESS OF LABORATORY Newforge Lane, Belfast BT9 5PX
NAME OF REVIEWER Dr.F. Choudry & Dr. M. Chaudry		NAME OF FOREIGN OFFICIAL Dr. Robert Huge & Dr. S. NEIL	

RESIDUE	ITEM NO.	COMMENTS
Sal.	07	<p>Northern Ireland had initially adopted the FSIS regulatory requirements for detecting the presence of <i>Salmonella spp.</i> in raw meat products. During the 2003 audit it was observed that the laboratory was using the alternate Method NF 11 without submitting it to FSIS, for equivalence determination.</p> <p>The Northern Ireland's Department of Agriculture and Rural Development (DARD) submitted Method NF 11 (that they are using to analyze <i>Salmonella</i> samples) to FSIS in August 2003 for equivalence determination.</p>

United States Department of Agriculture  
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Grampian Country Foods LTD 70 Molesworth Road, Co Tyrone BT80 8PJ Cookstown	2. AUDIT DATE 04/21/04	3. ESTABLISHMENT NO. UK9052	4. NAME OF COUNTRY Northern Ireland
5. NAME OF AUDITOR(S) Dr. F. Choudry & Dr. M. Chaudry		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	
<b>Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements</b>		<b>Part E - Other Requirements</b>	
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	
<b>Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements</b>		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	
<b>Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements</b>		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.		<b>Part F - Inspection Requirements</b>	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
<b>Part C - Economic / Wholesomeness</b>		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/Park Skins/Moisture)		54. Ante Mortem Inspection	
<b>Part D - Sampling Generic E. coli Testing</b>		55. Post Mortem Inspection	
27. Written Procedures		<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis		56. European Community Directives	
29. Records		57. Monthly Review	
<b>Salmonella Performance Standards - Basic Requirements</b>		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

Establishment: UK9052

Audit Date: 04/21/04

Slaughter & Processing Establishment

61. NAME OF AUDITOR

Dr. F. Choudry & Dr. M. Chaudry

62. AUDITOR SIGNATURE AND DATE

*Dr. F. Choudry* 05/06/04

United States Department of Agriculture  
Food Safety and Inspection Service

### Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Interfrigo Ltd Steeple Industrial Estate, Steeple Road ANTRIM, Co Antrim BT41 1AB	2. AUDIT DATE 04/22/04	3. ESTABLISHMENT NO. UK9028	4. NAME OF COUNTRY Northern Ireland
5. NAME OF AUDITOR(S) Dr. F. Choudry & Dr. M. Chaudry		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	

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

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	O
<b>Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements</b>		<b>Part E - Other Requirements</b>	
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	
<b>Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements</b>		40. Light	
14. Developed and implemented a written HACCP plan .	O	41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	O	42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.	O	43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.	O	44. Dressing Rooms/Lavatories	
<b>Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements</b>		45. Equipment and Utensils	
18. Monitoring of HACCP plan.	O	46. Sanitary Operations	
19. Verification and validation of HACCP plan.	O	47. Employee Hygiene	
20. Corrective action written in HACCP plan.	O	48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.	O	<b>Part F - Inspection Requirements</b>	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	O	49. Government Staffing	
<b>Part C - Economic / Wholesomeness</b>		50. Daily Inspection Coverage	
23. Labeling - Product Standards	O	51. Enforcement	
24. Labeling - Net Weights		52. Humane Handling	O
25. General Labeling		53. Animal Identification	O
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	O	54. Ante Mortem Inspection	O
<b>Part D - Sampling Generic E. coli Testing</b>		55. Post Mortem Inspection	O
27. Written Procedures	O	<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis	O	56. European Community Directives	
29. Records	O	57. Monthly Review	
<b>Salmonella Performance Standards - Basic Requirements</b>		58.	
30. Corrective Actions	O	59.	
31. Reassessment	O		
32. Written Assurance	O		

60. Observation of the Establishment

Establishment #UK9028

Audit Date 04/22/04

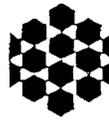
Cold Storage Facility

61. NAME OF AUDITOR

Dr. F. Choudry & Dr. M. Chaudry

62. AUDITOR SIGNATURE AND DATE

*Dr. F. Choudry* 05/06/04



Department of  
**Agriculture and  
Rural Development**  
www.dardni.gov.uk

**VETERINARY SERVICE**

**Room 716 Dundonald House  
Upper Newtownards Road  
BELFAST  
BT4 3SB**

Tele: 02890 525565  
Fax: 02890 525012

1 July 2004

Dear Mr Kurz

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

***April 20 through May 4, 2004***

Thank you for the copy of report of the audit carried out by Dr Choudry of our Meat Hygiene Systems in Northern Ireland. We are pleased that he was generally content with the system in place and with the performance of my officials.

On the one outstanding non-compliance, that relating to the laboratory method used to analyse salmonella samples, scientists from DARD's Veterinary Sciences Division will continue to work with FSIS officials in their efforts to determine the method's equivalence.

Kind regards,

Yours sincerely

**R M Houston  
Chief Veterinary Officer**

**Peter Kurz  
Minister Counselor  
United States Department of Agriculture  
American Embassy  
24 Grosvenor Square  
Box 48  
London  
W1A 1AE**