



United States
Department of
Agriculture

Food Safety
and Inspection
Service

Washington, D.C.
20250

Dr. Robert A. Bell
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State Veterinary Service
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FEB 20 2001

Dear Dr. Bell:

Thank you for your letter of November 22, 2000, providing comments to the Food Safety and Inspection Service's (FSIS) draft report of FSIS' May 3-25, 2000, audit of England's meat and poultry inspection. Enclosed is a copy of the final audit report, of which we included your November letter as an addendum. We appreciate MAFF's quick attention to the deficiencies identified in the August 24, 2000, draft final report and the assurances that corrective actions have been taken.

Regarding the issues and questions addressed in your November letter, we hope the following responses provide adequate clarification.

1. Intra-laboratory Check Sample Program

FSIS requires *each* laboratory analyst conducting tests for residue compounds to participate in a *monthly* intra-laboratory check sample program. It is possible that the Food Analysis Performance Assessment Scheme (FAPAS) you identified in your letter complies with this requirement. However, to make an equivalence determination, we request that you provide us with a copy of the FAPAS procedures and advise us when you anticipate implementation of this program.

2. Submission of Laboratory Test Results

FSIS requires the results of laboratory analyses to be submitted to government, officials within 10 working days from the date the samples were taken. A timely review of laboratory test results enhances FSIS' ability to quickly identify and act upon potential problems concerning animals and animal products with residue violations. UK's National Residue Surveillance Scheme, which provides for a fast-track system to monitor animals suspected of residue violations, appears to satisfy FSIS' requirements.

3. Species Verification

FSIS acknowledges receipt of UK's April 14, 2000 letter requesting an exemption from routine species testing of fresh and cooked products produced for export to the United States. We are currently reviewing this request along with those from other countries exporting meat and/or poultry to the United States, and we hope to complete the review process in the near future. Meanwhile, the UK should continue species verification testing for product exported to the United States until an exemption is granted.

4. Monthly Supervisory Visits at Cold Storage Facilities

FSIS regulations [9 CFR 327.2(a)(2)(iv)(A)] require monthly supervisory visits by a foreign inspection official to each establishment certified to export their products to the United States. This includes cold storage facilities, such as UK establishment 2205, whose business activities could be limited to storing products. In the United States, cold storage facilities handling federally inspected product must meet FSIS requirements. UK establishment 2205 is certified by MAFF to export products to the United States and therefore must be subject to monthly reviews by foreign inspection officials. However, these monthly reviews are not required when UK 2205 or any other certified establishment is not actively exporting their products to the United States.

5. Generic *Escherichia coli* (*E.coli*) and *Salmonella* Testing

In accordance with FSIS regulations 9 CFR 310.25 and 381.94, slaughter establishments are subject to both generic *E.coli* and *Salmonella* testing while establishments producing ground beef are subject to only *Salmonella* testing. However, in addition to this requirement, FSIS also requires establishments producing ground beef to conduct routine testing of raw ground beef products for *E.coli* O157:H7 or require their suppliers of boneless beef to certify that each lot received has been tested and found negative for *E.coli* O157:H7. FSIS has a zero tolerance for *E.coli* O157:H7 in ground beef products.

6. Frequency for *Salmonella* Sampling Sets at UK Establishment 2060

FSIS does not establish the rate of frequency at which *Salmonella* sampling sets are determined by the foreign government inspection system. FSIS regulation, 9 CFR 310.25(b), states that the sampling and testing of raw products in individual establishments are on an unannounced basis and the frequency and timing of such sampling/testing are based upon the establishment's previous test results and other information concerning an establishment's performance. Accordingly, FSIS requires the foreign government to determine this frequency. However, FSIS would recommend, as a minimum, a frequency of one sampling set per year as a starting basis.

I have enclosed copies of the FSIS regulations cited in this letter. If you have any questions regarding the final audit report or our responses to the issues/questions addressed in your November letter, please contact me at telephone number 202-720-3781, fax number 202-720-7990, or email address (sally.stratmoen@usda.gov).

Sincerely,

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

Sally Stratmoen, Acting Director
International Policy Staff
Office of Policy, Program Development
and Evaluation



AUDIT REPORT FOR ENGLAND

MAY 3 THROUGH 25, 2000

December 13, 2000

INTRODUCTION

Background

This report reflects information that was obtained during an audit of England's meat and poultry inspection systems from May 3 through 25, 2000. The five establishments certified to export meat/poultry to the United States were audited. One of these was a slaughter and processing establishment; two were conducting processing operations only, and two were cold store facilities.

The last audit of England's meat inspection system was conducted in February 1999. All five of the establishments certified by the officials of the Meat Hygiene Service (MHS) were audited: four (Ests. 20, 2060, 2134, and 2205) were acceptable and one (5049) was evaluated as acceptable/re-review. The major concerns at that time were the following:

1. Contamination of turkey carcasses with bile and fecal material was observed in Est. 5049. *This establishment was not on the U.S.-certified list at the time of this new audit.*
2. Establishment employees were conducting postmortem inspection procedures on turkeys at Est. 5049. *No poultry establishments were certified for eligibility to produce for the United States at the time of this new audit; MHS officials have assured FSIS that, in any poultry establishment certified for U.S. export, inspection procedures will be performed by MHS employees.*
3. Poor ventilation was found in the evisceration and inspection areas in Est. 2060. *This establishment was visited as part of this new audit; the ventilation problems had been adequately addressed and corrected.*

Among the deficiencies identified during this new audit were the following:

1. Lack of essential hand-washing facilities,
2. Inadequate light at post-mortem inspection stations, and
3. Species verification not being performed.

Importation of beef or beef products was not allowed at the time of this audit due to the presence of Bovine Spongiform Encephalopathy in the United Kingdom. The only restriction on pork products was that the product must be indigenous and processed in a dedicated establishment that receives no animals from countries where Swine Vesicular Disease exists (these conditions were fulfilled in England). There were no specific restrictions on the importation of poultry products from England, except that they must be processed in establishments certified to export to the United States. No poultry establishments were certified as eligible to export to the United States at the time of this audit.

During calendar year 1999, one establishment (2060) exported 7,658,173 lbs. of pork and pork products to the U.S., of which 0.02% was rejected at ports of entry (POE) for transportation damage. During the first three months of 2000, 2,461,548 lbs. of pork carcasses & cuts were exported; there were no POE rejections.

PROTOCOL

This on-site audit was conducted in four parts. One part involved visits with English national meat/poultry inspection officials to discuss oversight programs and practices, including enforcement activities. The second entailed an audit of a selection of records in the meat/poultry inspection headquarters facilities preceding the on-site visits. The third was conducted by on-site visits to establishments: all the establishments currently certified by MHS as eligible to export to the U.S. were audited on-site. The fourth was a visit to two laboratories, one performing analytical testing of field samples for the national residue testing program, and the other culturing field samples for the presence of microbiological contamination with *Salmonella*.

England's inspection system 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 *E. coli* testing program, and (5) enforcement controls, including 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

Based on the performance of the individual establishments, England's "In-Plant Inspection System Performance," on the whole, was evaluated as In-Plant System Controls In Place, although some serious deficiencies were found.

Effective inspection system controls were found to be in place in all five of the establishments audited; one of these (Est. 2060) was recommended for re-review. Details of audit findings, including compliance with HACCP, SSOPs, and testing programs for *Salmonella* and generic *E. coli* are discussed later in this report.

Entrance Meeting

On May 3, an entrance meeting was held in the London offices of the Meat Hygiene Service, and was attended by Mr. Robin Bell, Head, Veterinary International Trade Team; Mr. Anthony Greenleaves, Veterinary Head of Team (Field), Veterinary Public Health Unit; Mr. Alistair Booth, Veterinary Meat Hygiene Advisor; Mr. Tony Navid, Veterinary Advisor; Mr. Steve Knight, Agricultural Economist, American Embassy, London; and Dr. Gary D. Bolstad, International Audit Staff Officer, FSIS. [Note: the common title of address for a veterinarian in England is “Mr.”] Topics of discussion included the following:

1. The audit itinerary and lodging accommodations were finalized.
2. The auditor provided a copy of the current Enforcement Quarterly Report and informed the MHS officials where it could be located on the FSIS home page. He inquired whether England also makes similar information available to the public; the English officials provided copies of the Meat Hygiene Enforcement Report, the BSE Bulletin, and the Hygiene Assessment System Scores (HASS), all monthly publications available to the general public. They said there were plans to have the information available on the Internet in the near future.
3. The auditor provided copies of the data-collection instruments he would be using in the audits of the individual establishments (Attachments A, B, C, and D).

Headquarters Audit

Effective as of April 3, 2000, the Meat Hygiene Service (MHS) was transferred from the Ministry of Agriculture, Fisheries, and Food (MHS) to the Food Standards Agency (FSA) within the Department of Health. The structure and internal management of the MHS remained unchanged.

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

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

1. Samples of field notification of emerging U.S. requirements
2. A summary of recent supervisory visits
3. Samples of official veterinary certificates for the movement, within Great Britain, of fresh meat, other than beef, for export, or beef of United Kingdom (UK) origin.

4. A copy of a letter to FSIS requesting exemption from the species testing requirement, dated 4/14/00; no reply had been received. In the meantime, no species testing was being performed.
5. A sample of a blank health export certificate for product for the United States

The only concern that arose as a result the examination of these documents was that species testing had been discontinued before FSIS responded to the request for exemption; the English officials stated that they were certain it would be granted.

Government Oversight

All veterinarians and inspectors in establishments certified by England as eligible to export meat/poultry products to the United States were MHS employees, receiving no remuneration for their meat inspection services from either industry or establishment personnel.

Some veterinarians who were in charge of the oversight of establishments (Est. 20, for example) were Local Veterinary Inspectors, who were part-time employees of MHS: they were reimbursed for the services rendered here strictly by the Food Standards Agency. Their supervisors were full-time employees of the Food Standards Agency.

Establishment Audits

Five establishments (20, 2060, 2134, 2182, and 2205) were certified to export meat products to the United States at the time this audit was conducted. No poultry establishments were currently certified for U.S. export. All five establishments were visited for on-site audits, and both MHS inspection system controls and establishment system controls were found to be in place to prevent, detect and control contamination and adulteration of products. Est. 5049 withdrew its U.S. certification shortly before this audit was to begin.

Laboratory Audits

During the laboratory audits, emphasis was placed on the application of procedures and standards that were equivalent to U.S. requirements. Information about the following risk areas was also collected:

1. Government oversight of accredited, approved, and private laboratories
2. Intra-laboratory quality assurance procedures, including sample handling
3. Methodology

The Laboratory of the Government Chemist in Taddington, Middlesex, London was audited on May 16, 2000. (In spite of the official name of the laboratory, it was not owned or operated by the agencies involved with the meat inspection service, but was rather privately

owned. One-third of the shares of the company were owned by each of three groups: (1) the management and staff of the laboratory, (2) the Royal Society of Chemistry, which also audited the laboratory annually to ensure that standards were maintained “on a level that would be expected if the laboratory were still government-owned”, and (3) a private group of investors in technology ventures.)

Effective controls were found to be in place for sample handling and frequency, data reporting, tissue matrices for analysis, equipment operation and printouts, minimum detection levels, recovery frequency, percent recoveries, and corrective actions. The methods used for the analyses were acceptable. No compositing of samples was done. There were two areas of concern:

1. There was no intra-laboratory check sample program. Analyst proficiency in this laboratory was evaluated via participation in a Food Analysis Performance Assessment Scheme (FAPAS), an inter-laboratory check sample program used within the European Community. Under this program, a set of check samples for each of the residue categories was provided every 2 or 3 months, and each section in the laboratory (but not necessarily each analyst within each section) participated in the analysis of these check samples. FSIS expects each analyst, who participates in field sample determinations for the national residue testing program for meat and poultry, to participate in a monthly intra-laboratory check sample program for each class of compounds for which that analyst performs the analyses for the field samples.
2. The target turnaround time (the amount of time between receipt of samples in the laboratory and completion of analysis, for all classes of compounds) was 28 calendar days. FSIS expects a turnaround time of 10 working days. (Note: field samples for microbiological screening were processed immediately upon receipt.)

England’s microbiological testing for *Salmonella* in product from the only active producer of product exported to the United States was being performed in a private laboratory, Allied Laboratory Services Ltd., in Grimsby. It was audited on May 15. 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 was accredited/approved by the government, accredited by third party accrediting organization with oversight by the government, or a government contract laboratory.
2. The laboratories had properly trained personnel, suitable facilities and equipment, a written quality assurance program, and reporting and record-keeping capabilities.
3. Results of analyses were being reported to the government or simultaneously to the government and establishment.

No concerns arose as a result of the audit of this laboratory.

Establishment Operations by Establishment Number

The following operations were being conducted in the five establishments:

Cold storage facilities (Establishments 2182 and 2205)

Beef and pork grinding, patty production, and freezing (20)

Pork Cutting and boning and (not for U.S. export) curing (2134)

Pork slaughter, cutting, and (not for U.S. export) boning and cooked hams (2060)

SANITATION CONTROLS

Based on the on-site audits of establishments, England's inspection system had controls in place for water potability, chlorination procedures, back-siphonage prevention, sanitizers, separation of establishments, pest control programs and monitoring, temperature control, work space, ventilation, dry storage areas, product-contact equipment, dry storage areas, ante-mortem and welfare facilities, outside premises, and personal dress and habits.

Sanitation Standard Operating Procedures (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 used accompanies this report (Attachment A).

The SSOPs were found to meet the basic FSIS regulatory requirements.

Basic Establishment Facilities

1. Lack of adequate hand-washing facilities was a finding in two establishments. In Est. 2060, no hand soap dispensers were present at either the viscera inspection station or the inspection station for the cervical lymph nodes, and in Est. 2134, there was no hand wash station or sterilizer at the dropped meat trimming station. The matter was discussed in detail during both establishment summary discussions and in the country exit meeting. Establishment officials agreed to install the required equipment promptly, and inspection officials assigned to positions in the establishments, as well as those responsible for the evaluation of these premises in a supervisory capacity, proposed prompt and continuous monitoring of compliance.
3. Light was inadequate at some inspection stations in Est. 2060. A light intensity of 50 foot-candles (fc) of shadow-free light is required by FSIS at the inspection surfaces. The auditor measured 15 fc in abdominal cavities, 20 fc at cervical lymph nodes, and, even with no carcasses present, 30 fc at the level of the shoulders. Establishment officials agreed to install compliant lighting promptly, and meat inspection officials expressed an intention to monitor the light intensity in these critical areas in the future.
3. Maintenance and cleaning of over-product equipment in Est. 2060, at the entrance to the retained carcass room, the head recovery area, and carcass cooler #4 had been seriously neglected, as evidenced by the presence of heavy buildups of rust, flaking paint, and/or

old, dried meat scraps, dry and caked grease, etc. Inspection officials ordered improved maintenance, cleaning, and monitoring.

Cross-Contamination

In Est. 2134, the dropped-meat trimmer was observed to contact the inedible container with his hands. The Veterinarian-In-Charge took immediate corrective actions: the trimmer washed his hands before continuing his operations.

Product Handling and Storage

Meat products were found to be stored under insanitary conditions in two establishments:

In Est. 20, a 1" x 2" grease smear was found on a piece of meat ready to be placed in a grinder. It was removed. Several chips of wood, apparently from pallets, were found on the protective coverings of containers of meat. Some of these coverings were not intact, so that the product was not adequately protected. One container of inadequately covered meat was observed to be stored in the freezer directly under a wooden pallet. MHS officials ordered corrective actions and increased monitoring of incoming product.

In Est. 2060, condensation was found to be dripping onto exposed product in carcass coolers 2 and 3 and on one processing line. Effective corrective actions were not immediate, but were eventually taken by the senior meat inspection representative.

Personnel Hygiene and Practices

In Est. 2060, an edible product worker, wearing his scabbard, knife, and steel, was sweeping meat scraps from the floor and handling floor-cleaning equipment (broom and shovel). Corrective actions by the establishment officials were immediate.

ANIMAL DISEASE CONTROLS

England's inspection system had controls in place to ensure adequate animal identification and procedures for sanitary handling of returned and rework product.

There were reported to have been 200 confirmed cases of Bovine Spongiform Encephalopathy (BSE) in England between January 1 and March 31, 2000. Due to the presence of BSE, the United States accepts no beef imports from England.

RESIDUE CONTROLS

England's National Residue Testing Plan for 2000 was being followed, and was on schedule. The English inspection system had adequate controls in place to ensure compliance with sampling and reporting procedures and storage and use of chemicals.

SLAUGHTER/PROCESSING CONTROLS

The English inspection system had controls in place to ensure adequate sanitary dressing procedures, equipment sanitizing, product reconditioning and transportation, waste disposal, humane handling and slaughter, condemned and restricted product control, returned/rework product, pre-boning trim, ingredients identification, formulations, packaging materials, laboratory confirmation, label approvals, inspector monitoring, processing equipment, and post-processing handling.

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.

Testing for Generic *E. coli*

England had adopted the FSIS regulatory requirements for *E. coli* testing.

Three of the establishments audited (20, 2060, and 2134) 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.

ENFORCEMENT CONTROLS

Inspection System Controls

Except as noted below, the MHS inspection system controls [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.

In Est. 2060, swine were not observed from both sides in motion during ante-mortem inspection. The Veterinarian-In-Charge of the establishment said he was aware of the requirement but had neither the time nor the assistance he would need to accomplish this. The requirement was discussed with senior meat inspection officials during the exit meeting from the country; they expressed their intention to ensure correction.

In Est. 20, the defect criteria guide for boneless meat reinspection had not been updated to reflect the zero-tolerance policy for feces and ingesta. Note: a review of documents dating back to the beginning of the calendar year showed that no feces or ingesta had been found in boneless meat in that time: the zero-tolerance policy was, in fact, being enforced. Prompt upgrading of the defect criteria sheets was promised.

Testing for *Salmonella* Species

Three of the establishments audited (20, 2060, and 2134) 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 data collection instrument used accompanies this report (Attachment D).

England had adopted the FSIS regulatory requirements for *Salmonella* testing with the exception of the following equivalent measure:

SAMPLE COLLECTOR. Establishments take samples.

England had a clearly written sampling plan for sample collection and handling procedures that was being followed in all establishments exporting product to the U.S.

English government veterinarians assigned to establishments were providing direct supervision over establishment sample collection and handling procedures to ensure that such activities were being conducted correctly. Oversight and verification of establishment procedures were also undertaken monthly by the U.K.'s Principal Official Veterinary Surgeon and annually by the UK's Veterinary Meat Hygiene Advisor, both of the MHS. The government veterinarians assigned to the establishment also were collecting routine samples for analysis in a government laboratory for monitoring purposes. England had a system for

investigating discrepancies between establishment samples and government samples. Test results were being provided directly from the laboratory to the government veterinarians assigned to the establishments.

The government veterinarians were reviewing test results to monitor establishment performance over time, and England was committed to take immediate action any time an establishment should fail to meet a *Salmonella* performance standard.

Species Verification

At the time of this audit, England was not exempt from the species verification requirement; yet the verification had been discontinued. The English officials had officially requested an exemption, but a decision had not yet been made by FSIS. The English officials stated that they were certain it would be granted.

Monthly Reviews

These reviews were being performed by some thirty Principal Official Veterinary Surgeons (POVS). All were veterinarians with experience in establishments, and were promoted to this position within the organization. All had received special instruction and ongoing training in foreign requirements.

The internal review program was being applied equally to both export and non-export establishments, except that internal reviews were not conducted monthly in establishments that were not certified to export to the U.S. Internal review visits were not announced in advance to establishment personnel; inspection personnel were given “a few days” advance notice, and were conducted, by single individuals, at least once monthly, and sometimes more frequently. The records of audited establishments were kept in the inspection offices of the individual establishments; copies were also kept in the five regional offices, and were routinely maintained on file for a minimum of 1 year.

In the event that an establishment is found, during one of these internal reviews, to be out of compliance with U.S. requirements, the internal reviewers would report to Mr. Tony Navid, Veterinary Advisor, who would make the ultimate decision regarding delistment.

A delisted establishment would be excluded from exporting to the U.S., in the short term, by non-issue of health export certificates, which are supplied only to the IIC in the establishments, not to management.

If an establishment is delisted for U.S. export, before it may again qualify for eligibility to be reinstated, the matter is referred to the appropriate Veterinary Meat Hygiene Officer, who would make additional visits and evaluations.

As stated in Section 327.2(a)(2)(iv)(a) and (b) of Title 9 of the U.S. Federal Code of Regulations, supervisory visits, and written reports of the results, are required to be made to

all establishments certified as eligible to export to the U.S., and they are to be made at least monthly, except “during a period when the establishment is not operating or is not engaged in producing products for exportation to the United States.” At least one such visit is required per year in establishments which do not produce products for the U.S. According to the MHS officials, this requirement for supervisory visits was not understood until mid-1999; they stated that previous FSIS auditors had not indicated a need for these. When Mr. Alistair Booth, Veterinary Meat Hygiene Advisor, Veterinary Public Health Unit, was in the U.S. in February 1999, visiting establishments on a correlation tour, he became aware of the requirement and was responsible for its implementation in England. The monthly visits to Ests. 2060, the only establishment actively producing products for export to the U.S. (and also to Est. 20) were initiated in September 1999, and to the cold store facility through which these products passed, in October 1999 (the delay was due to an injury). A supervisory visit had been performed in Est. 2134, but none at all had as yet been documented at Est. 2182, a cold-store facility which did not handle any U.S.-eligible product. The documentation of the supervisory visits made to Est. 20 needed improvement. The auditor discussed the need for, and documentation of, these visits in all U.S.-listed establishments both during the on-site visits and in the country exit meeting.

After observing the internal reviewers’ activities in the field, the auditor was confident in their professionalism, thoroughness, and knowledge of, U.S. requirements, and in the effectiveness of England’s internal review program as a whole.

Enforcement Activities

As part of the recent reorganization, England’s Enforcement and Food Standards Group included two new divisions to help local authorities improve the effectiveness of local enforcement of food standards legislation and to help consolidate and further develop the work on enforcing food laws, which had been previously divided between the Department of Health and MHS. The first of the two new divisions, the Local Authority Enforcement (Policy) Division, set standards for local authorities’ enforcement of food laws and monitors their performance against those standards. The other, the Local Authority Enforcement (Support) Division, worked with local authority enforcement services to improve standards by providing advice, guidance, and training on technical, professional, and legislation issues, and furthermore took over responsibility for the existing food hazard warning system, policy on statutory enforcement powers, and import controls on fish and food of non-animal origin.

The Meat Hygiene Division was responsible for the standards of meat hygiene in all licensed establishments.

The Food Labelling [sic], Standards and Consumer Protection Division managed a program of surveys and investigations to check the level of food adulteration, “mis-description,” and fraud, and ensured that food met appropriate quality standards.

The Food Emergencies Unit developed standards and protocols for the Food Standards Agency’s handling of emergencies and developed generic risk-management approaches for use in internal incident plans.

A Legal Services Division provided legal advice and legislative drafting for the Food Standards Agency and the Meat Hygiene Service and was responsible for quality assurance and supervision of litigation and other legal services provided by other Departments or the private sector; its Investigative Branch investigated suspected breaches of meat hygiene legislation.

The Food Standards Agency produced three publications of its activities, the Meat Hygiene Enforcement Report, which provides detailed summaries of legal actions taken against violators; the Meat Hygiene Enforcement Report Supplement, which publishes “Hygiene Assessment System (HAS) Scores” for all licensed slaughterhouses and cutting plants in the United Kingdom; and the BSE Enforcement Bulletin. These were made available to the general public.

Exit Meetings

An exit meeting was conducted in London on May 25. The participants were Mr. Peter Soul, Director of Operations, Meat Hygiene Service; Mr. Anthony Greenleaves, Veterinary Head (Field), Veterinary Public Health Unit; Mr. Tony Navid, Veterinary Advisor, Veterinary International Trade Team, State Veterinary Service Headquarters; Mr. Alistair Booth, Veterinary Meat Hygiene Advisor, Veterinary Public Health Unit; Ms. Maggie Green, Veterinary Medicine Directorate, Residue Testing Program; Mr. Steve Knight, Agricultural Economist, American Embassy, London; and Dr. Gary D. Bolstad, International Audit Staff Officer, FSIS. The audit findings were discussed:

1. Inadequate prevention of contamination (Ests. 20, 2060, and 2134). Corrective actions were taken (immediately except in Est. 2060); MHS officials promised improved monitoring.
2. Inadequate hand-washing facilities (Ests. 2060 and 2134). Prompt installation of the required equipment was scheduled.
3. Inadequate light at inspection stations (Est. 2060). Prompt compliance was promised.
4. Neglected maintenance and cleaning of over-product equipment (Est. 2060). Improved programs were proposed by management and improved monitoring was scheduled by MHS.
5. Swine were not observed from both sides in motion during ante-mortem inspection in the sole slaughter establishment (2060). Upper-level meat inspection officials indicated that this would be rectified in the very near future.
6. The issues of the 28-day turnaround time for routine residue analyses and the 2-3 month intervals between check samples have been referred to the Office of Policy, Program Development, and Evaluation for equivalence determination.

7. The requirement for supervisory visits to all establishments certified as eligible to export to the U.S. was discussed in detail. The MHS officials agreed to ensure that these visits would be performed as required.
8. Species verification had been discontinued although an exemption from the requirement had not yet been granted by FSIS. The exemption had been requested, and the English officials stated that they were certain it would be granted shortly.
9. The MHS officials were advised, since Est. 5049 had relinquished its eligibility to export to the U.S. within such a short time of the scheduled FSIS audit, of the FSIS policy that establishments delisted, either after receipt of the official message informing the country of FSIS' intention to conduct the audit and prior to the FSIS audit, or during the audit, may not be relisted until the country provides the International Policy Division, FSIS, with (1) the reasons for delistment and (2) a description of actions or conditions have changed that warrant relistment. In addition, they were advised that it may be necessary for FSIS to review the establishments prior to its re-listment.

CONCLUSION

The inspection system of England 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. Five establishments were audited: four were acceptable, and one was evaluated as acceptable/re-review.

The other deficiencies encountered during the on-site establishment audits were adequately addressed to the auditor's satisfaction before the termination of each audit.

Dr. Gary D. Bolstad
International Audit Staff Officer

(Signed) Dr. Gary D. Bolstad

ATTACHMENTS

- A. Data Collection Instrument for SSOPs
- B. Data Collection Instrument for HACCP programs
- C. Data Collection Instrument for *E. coli* testing.
- D. Data Collection Instrument for *Salmonella* testing.

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
20	√	√	√	√	√	√	√	√
2060	√	√	√	√	√	√	√	√
2134	√	√	√	√	√	√	√	√
2182	√	√	NA	√	√	√	√	√
2205	√	√	NA	√	√	√	√	√

Data Collection Instrument for HACCP Programs

Each of the establishments approved to export meat products to the U.S. (except Est. 12, which was a cold-storage facility) 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 had conducted a hazard analysis.
3. The analysis includes food safety hazards likely to occur.
4. The analysis includes the intended use of or the consumers of the finished product(s).
5. 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.
6. All hazards identified in the analysis are included in the HACCP plan; the plan lists a CCP for each food safety hazard identified.
7. The HACCP plan specifies critical limits, monitoring procedures, and the monitoring frequency performed for each CCP.
8. The plan describes corrective actions taken when a critical limit is exceeded.
9. The HACCP plan was validated using multiple monitoring results.
10. *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.*
11. The HACCP plan's record-keeping system documents the monitoring of CCPs and/or includes records with actual values and observations.
12. The HACCP plan is dated and signed by a responsible establishment official.

The results of these evaluations were as follows:

Est. #	1. Flow diagram	2. Hazard analysis conducted	3. All hazards identified	4. Use & users included	5. Plan for each hazard	6. CCPs for all hazards	7. Monitoring is specified	8. Corr. actions are described	9. Plan validated	10. Adequate verific. procedures	11. Adequate documentation	12. Dated and signed
20	√	√	√	√	√	√	√	√	√	√	√	√
2060	√	√	√	√	√	√	√	√	√	√	√	√
2134	√	√	√	√	√	√	√	√	√	√	√	√

Data Collection Instrument for Generic *E. coli* Testing

Each establishment (except Est. 12, which was a cold-storage facility) 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 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. Predominant 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
20	√	√	√	NA	√	√	√	√	√	√
2060	√	√	√	√	√	√	√	√*	√	√
2134	√	√	√	√	√	√	√	√	√	√

* Est. 2060 was using Tryptone Bile agar following aerobic incubation at 44°C after resuscitation on Mineral Modified Glutamate Agar incubated aerobically at 37°C .

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
20	√	NA	√	√	√	NA
2060	√	√	NA	√	√	NA
2134	√	√	√	√	√	NA

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE INTERNATIONAL PROGRAMS FOREIGN COUNTRY LABORATORY REVIEW	REVIEW DATE 5/16/2000	NAME OF FOREIGN LABORATORY Laboratory of the Government Chemist
FOREIGN GOV'T AGENCY See Reverse	CITY & COUNTRY London, England	ADDRESS OF LABORATORY Queens Road, Taddington, Middlesex
NAME OF REVIEWER Dr. Gary D. Bolstad	NAME OF FOREIGN OFFICIAL Mr. Reg Perry, Mr. Ian Lumley, Dr. Colin Penny	

Residue Code/Name			100	200	300	400	500	600	800	900	Lev	Cbd	Ivm
SAMPLING PROCEDURES	REVIEW ITEMS	ITEM #											
	Sample Handling	01											
	Sampling Frequency	02											
	Timely Analyses	03											
	Compositing Procedure	04											
	Interpret Comp Data	05											
Data Reporting	06												
ANALYTICAL PROCEDURES	Acceptable Method	07	A	A	A	A	A	A	A	A	LC	LC?	LC
	Correct Tissue(s)	08	A	A	A	A	A	A	A	A	Liv	?	Liv
	Equipment Operation	09	A	A	A	A	A	A	A	A	A	A	A
	Instrument Printouts	10	A	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	A
	Recovery Frequency	12	A	A	A	A	A	A	A	A	A	A	A
	Percent Recovery	13	A	A	A	A	A	A	A	A	A	A	A
	Check Sample Frequency	14	C	C	C	C	C	C	C	C	C	C	C
	All analyst w/Check Samples	15	C	C	C	C	C	C	C	C	C	C	C
	Corrective Actions	16	A	A	A	A	A	A	A	A	A	A	A
International Check Samples	17	O	O	O	O	O	O	O	O	O	O	O	
REVIEW PROCEDURES	Corrected Prior Deficiencies	18	O	O	O	O	O	O	O	O	O	O	O
OTHER REVIEW		19											
		20											

SIGNATURE OF REVIEWER	DATE
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FOREIGN COUNTRY LABORATORY REVIEW <i>(Comment Sheet)</i>		REVIEW DATE 5/16/2000	NAME OF FOREIGN LABORATORY Laboratory of the Government Chemist
FOREIGN GOV'T AGENCY See Reverse		CITY & COUNTRY London, England	ADDRESS OF LABORATORY Queens Road, Taddington, Middlesex
NAME OF REVIEWER Dr. Gary D. Bolstad		NAME OF FOREIGN OFFICIAL Mr. Reg Perry, Mr. Ian Lumley, Dr. Colin Penny	

RESIDUE	ITEM	COMMENTS
All	03	The target turnaround time (the amount of time between receipt of samples in the laboratory and completion of analysis, for all classes of compounds) was 28 calendar days. FSIS expects a turnaround time of 10 working days. Note: field samples for microbiological screening were processed immediately upon receipt.
	08	The following were used as matrices for these determinations: CHCs - fat for meat samples and liver for poultry samples; antibiotics - kidney; hormones - urine and bile; nitrogen pesticides - kidney fat for meat and liver for poultry; and liver for levamisole and ivermectin.
All	14-15	<p>There was no intra-laboratory check sample program. Analyst proficiency in this laboratory was evaluated via participation in a Food Analysis Performance Assessment Scheme (FAPAS), an inter-laboratory check sample program used within the European Community. Under this program, a set of check samples for each of the residue categories was provided every 2 or 3 months, and each section in the laboratory (but not necessarily each analyst within each section) participated in the analysis of these check samples. Note: FSIS expects each analyst, who participates in field sample determinations for the national residue testing program for meat and poultry, to participate in a monthly intralaboratory check sample program for each class of compounds for which that analyst performs the analyses for the field samples.</p> <p>NOTE: In spite of the official name of the laboratory, it was not owned or operated by the government agencies involved with meat inspection, but was rather privately-owned. One-third of the shares of the company were owned by each of three groups: (1) the management and staff of the laboratory, (2) the Royal Society of Chemistry, which also audited the laboratory annually to ensure that standards were being maintained "on a level that would be expected if the laboratory were still government-owned," and (3) a private group of investors in technology ventures.</p>



Microbiology Laboratory Audit

General

Name & location of lab: *Allied Laboratory Services Ltd., Grimsby, England, 5/15/00*

Private or gov't lab? *Private*

How & when was accreditation obtained? *MAFF has not officially issued accreditation to this lab, but has assessed the laboratory for compliance with the national laboratory standard, has determined that it meets the requirements, and has officially notified Malton Bacon Factory that the microbiological testing for compliance with USDA requirements may be satisfied with this laboratory.*

How & how often is accreditation maintained? *See above.*

When and how is payment for analysis provided? *Malton Bacon Factory (Est. 2060) is billed at the end of each month for the services provided during that month.*

Are results released before payment is received? *Yes.*

What are the qualifications of the analyst(s) performing the individual tasks within a method? *All have participated in an internal training program, within the laboratory, for at least three years.*

What are the qualifications of the direct supervisor of the analyst(s)? *BSc in applied biology*

Methodology for HACCP Salmonella samples (regulatory labs)

Does this lab analyze HACCP Salmonella samples? *Yes*

How are HACCP Salmonella samples received & recorded? *A refrigerated vehicle belonging to the laboratory picks them up at the Est. 2060.*

Are HACCP Salmonella samples analyzed on the day of receipt? *Yes*

What method(s) is used for HACCP Salmonella samples? *The British Standard Method, EN 12824, published by the European Committee for Standardization (CEN). This method was supplied to FSIS International Policy Division in 1998. According to laboratory officials, it has been determined to be equivalent to the AOAC method.*

Is it a qualitative method (i.e. +/- result)? *Yes.*

Are HACCP ground beef samples analyzed for *Salmonella*? *No*

What is the size of the ground beef test portion? *N/A*

What buffer (and what volume) is used for:

Sponge samples for *Salmonella*? *The buffer solution is obtained and used by Est. 2060. This laboratory supplies the sponge and Whirl-Pak.*

Poultry rinsates for *Salmonella*? *N/A*

Salmonella ground beef sample homogenates? *N/A*

What is the formulation of the Buffered Peptone Water you use? *Will obtain from Est. 2060*

What analytical controls are used for *Salmonella* analyses (i.e. control cultures, etc.)? *Both positive and negative controls.*

Are they employed for each sample set? *Yes*

How are HACCP *Salmonella* results expressed? *"Present" or "Not Detected"*

How are HACCP *Salmonella* results recorded:

Data sheets/work sheets? *Raw data are recorded on work sheets. Results are then stored in a computer program. A printed report is sent by mail to the veterinarian in charge (Official Veterinary Surgeon) in Est. 2060.*

and/or Log books? *No—see above.*

How and to whom are HACCP *Salmonella* results reported? *See above.*

Are "check" samples periodically used to test the proficiency of the lab and analysts for *Salmonella* testing? *Yes. The laboratory participates in an external quality assurance program.*

1. For individual analysts or for the lab as a whole? *Both.*
2. What species/strains are used? *The internal samples are done with Salmonella poona. The strains used in the external samples vary, and include S. anatum, typhimurium, indiana, and enteritidis.*
3. How many samples are analyzed and how often? *Internally with each set of field samples.*
4. Are both inoculated and uninoculated samples provided to analysts for the proficiency testing? *Yes*
5. How many colony-forming units (cfu) per gram are inoculated into the proficiency samples provided to analysts? *1-10 (S. anatum and indiana) and 10-100 (S. typhimurium and enteritidis).*

Methodology for HACCP generic *E. coli* samples (in-plant or other private labs)

Does this lab analyze HACCP generic *E. coli* samples? *Yes*

How are HACCP *E. coli* samples received & recorded? *Same as above*

Are HACCP *E. coli* samples analyzed on the day of receipt? *Yes*

What method is used for HACCP generic *E. coli* samples? *British Standard 5763-13:1998. This method was supplied to FSIS International Policy Division in 1998. It has been determined to be equivalent to the AOAC method.*

Is it a quantitative method? *Yes*

What buffer (and what volume) is used for:

E. coli sponge samples? *The buffer solution is obtained and used by Est. 2060. This laboratory supplies the sponge and Whirl-Pak.*

Poultry rinsates for generic *E. coli*? *N/A*

What analytical controls are used (i.e. control cultures, etc.)? *Both positive and negative controls.*

Are they employed for each sample set? *Yes*

How are HACCP *E. coli* results calculated and/or expressed? *Number of CFUs /cm²*

How are *E. coli* results recorded:

Data sheets/work sheets? Raw data on work sheets. Results are then stored in a computer program. A printed report is sent by mail to the veterinarian in charge (Official Veterinary Surgeon) in Est. 2060.

Log books? *No—see above.*

How and to whom are HACCP *E. coli* results reported? *See above.*

Are "check" samples periodically used to test the proficiency of the lab and analysts for generic *E. coli* testing? *Yes*

6. For individual analysts or for the lab as a whole? *Both.*
7. What species/strains are used? *E. coli (not more narrowly defined)*
8. How many samples are analyzed and how often? *Approximately 18 per year.*
9. Are both inoculated and uninoculated samples provided to analysts for the proficiency testing? *Yes*
10. How many colony-forming units (cfu) per gram are inoculated into the proficiency samples provided to analysts? *Examples: 10³, 10⁴, 10⁶*

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE INTERNATIONAL PROGRAMS FOREIGN PLANT REVIEW FORM	REVIEW DATE 5/8/2000	ESTABLISHMENT NO. AND NAME 020, McKey Foods	CITY Milton Keynes
			COUNTRY England
NAME OF REVIEWER Dr. Gary D. Bolstad	NAME OF FOREIGN OFFICIAL Drs. E. Hargreaves, A. Elliott, Alistair Booth		EVALUATION <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable

CODES (Give an appropriate code for each review item listed below)
 A = Acceptable M = Marginally Acceptable U = Unacceptable N = Not Reviewed O = Does not apply

1. CONTAMINATION CONTROL		Cross contamination prevention	28 A	Formulations	55 A
(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing	29 A	Packaging materials	56 A
Water potability records	01 A	Product handling and storage	30 M	Laboratory confirmation	57 O
Chlorination procedures	02 O	Product reconditioning	31 A	Label approvals	58 O
Back siphonage prevention	03 A	Product transportation	32 N	Special label claims	59 O
Hand washing facilities	04 A	(d) ESTABLISHMENT SANITATION PROGRAM		Inspector monitoring	60 A
Sanitizers	05 A	Effective maintenance program	33 A	Processing schedules	61 O
Establishments separation	06 A	Preoperational sanitation	34 A	Processing equipment	62 A
Pest --no evidence	07 A	Operational sanitation	35 A	Processing records	63 O
Pest control program	08 A	Waste disposal	36 A	Empty can inspection	64 O
Pest control monitoring	09 A	2. DISEASE CONTROL		Filling procedures	65 O
Temperature control	10 A	Animal identification	37 O	Container closure exam	66 O
Lighting	11 A	Antemortem inspec. procedures	38 O	Interim container handling	67 O
Operations work space	12 A	Antemortem dispositions	39 O	Post-processing handling	68 A
Inspector work space	13 O	Humane Slaughter	40 O	Incubation procedures	69 O
Ventilation	14 A	Postmortem inspec. procedures	41 O	Process. defect actions -- plant	70 A
Facilities approval	15 A	Postmortem dispositions	42 O	Processing control -- inspection	71 A
Equipment approval	16 O	Condemned product control	43 A	5. COMPLIANCE/ECON. FRAUD CONTROL	
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control	44 O	Export product identification	72 A
Over-product ceilings	17 A	Returned and rework product	45 A	Inspector verification	73 A
Over-product equipment	18 A	3. RESIDUE CONTROL		Export certificates	74 A
Product contact equipment	19 A	Residue program compliance	46 O	Single standard	75 A
Other product areas (inside)	20 A	Sampling procedures	47 O	Inspection supervision	76 M
Dry storage areas	21 A	Residue reporting procedures	48 O	Control of security items	77 A
Antemortem facilities	22 O	Approval of chemicals, etc.	49 A	Shipment security	78 A
Welfare facilities	23 A	Storage and use of chemicals	50 A	Species verification	79 A
Outside premises	24 A	4. PROCESSED PRODUCT CONTROL		"Equal to" status	80 A
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim	51 M	Imports	81 A
Personal dress and habits	25 A	Boneless meat reinspection	52 O	SSOPs	82 A
Personal hygiene practices	26 A	Ingredients identification	53 A	HACCP	83 A
Sanitary dressing procedures	27 O	Control of restricted ingredients	54 O		

FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE 5/8/2000	ESTABLISHMENT NO. AND NAME 020, McKey Foods	CITY Milton Keynes
			COUNTRY England
NAME OF REVIEWER Dr. Gary D. Bolstad	NAME OF FOREIGN OFFICIAL Drs. E. Hargreaves, A. Elliott, Alistair Booth		EVALUATION <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable

COMMENTS:

30. A 1" x 2" grease smear was found on a piece of meat ready to be placed in a grinder. It was removed. Several chips of wood, apparently from pallets, were found on the protective coverings of containers of meat. Some of these coverings were not intact, so that the product was not adequately protected. One container of inadequately covered meat was observed to be stored in the freezer directly under a wooden pallet. MHS officials ordered corrective actions and increased monitoring of incoming product.

51 The defect criteria sheet had not been updated to reflect the zero-tolerance policy for contamination with feces or ingesta.

76 The supervisory visits were not adequately documented. The veterinarian in charge (Official Veterinary Surgeon) had not been verifying the establishment's monitoring of the CCPs. Both deficiencies were to be corrected immediately.

NOTE: Only samples had been exported to the US, at least 2 years prior to this audit; no product had been exported to the U.S. since that time. There were no immediate plans to begin export to the U.S.

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE INTERNATIONAL PROGRAMS FOREIGN PLANT REVIEW FORM	REVIEW DATE	ESTABLISHMENT NO. AND NAME	CITY
	5/9/00	2060, Malton Bacon Factory, Ltd.	Norton/Malton
			COUNTRY
			England

NAME OF REVIEWER Dr. Gary D. Bolstad	NAME OF FOREIGN OFFICIAL Drs. Andrew Gauldie, Alistair Booth	EVALUATION <input type="checkbox"/> Acceptable <input checked="" type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable
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CODES (Give an appropriate code for each review item listed below)
 A = Acceptable M = Marginally Acceptable U = Unacceptable N = Not Reviewed O = Does not apply

1. CONTAMINATION CONTROL		Cross contamination prevention	28 M	Formulations	55 O
(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing	29 A	Packaging materials	56 A
Water potability records	01 A	Product handling and storage	30 M	Laboratory confirmation	57 A
Chlorination procedures	02 A	Product reconditioning	31 A	Label approvals	58 A
Back siphonage prevention	03 A	Product transportation	32 N	Special label claims	59 O
Hand washing facilities	04 U	(d) ESTABLISHMENT SANITATION PROGRAM		Inspector monitoring	60 A
Sanitizers	05 A	Effective maintenance program	33 M	Processing schedules	61 O
Establishments separation	06 A	Preoperational sanitation	34 A	Processing equipment	62 A
Pest --no evidence	07 A	Operational sanitation	35 M	Processing records	63 O
Pest control program	08 A	Waste disposal	36 A	Empty can inspection	64 O
Pest control monitoring	09 A	2. DISEASE CONTROL		Filling procedures	65 O
Temperature control	10 A	Animal identification	37 A	Container closure exam	66 O
Lighting	11 M	Antemortem inspec. procedures	38 M	Interim container handling	67 O
Operations work space	12 A	Antemortem dispositions	39 A	Post-processing handling	68 A
Inspector work space	13 A	Humane Slaughter	40 A	Incubation procedures	69 O
Ventilation	14 A	Postmortem inspec. procedures	41 A	Process. defect actions -- plant	70 O
Facilities approval	15 A	Postmortem dispositions	42 A	Processing control -- inspection	71 O
Equipment approval	16 O	Condemned product control	43 A	5. COMPLIANCE/ECON. FRAUD CONTROL	
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control	44 A	Export product identification	72 A
Over-product ceilings	17 A	Returned and rework product	45 A	Inspector verification	73 A
Over-product equipment	18 M	3. RESIDUE CONTROL		Export certificates	74 A
Product contact equipment	19 A	Residue program compliance	46 A	Single standard	75 A
Other product areas (inside)	20 A	Sampling procedures	47 A	Inspection supervision	76 M
Dry storage areas	21 A	Residue reporting procedures	48 A	Control of security items	77 A
Antemortem facilities	22 A	Approval of chemicals, etc.	49 A	Shipment security	78 A
Welfare facilities	23 A	Storage and use of chemicals	50 A	Species verification	79 O
Outside premises	24 A	4. PROCESSED PRODUCT CONTROL		"Equal to" status	80 A
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim	51 A	Imports	81 A
Personal dress and habits	25 A	Boneless meat reinspection	52 A	SSOPs	82 A
Personal hygiene practices	26 M	Ingredients identification	53 A	HACCP	83 A
Sanitary dressing procedures	27 A	Control of restricted ingredients	54 A		

FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE 5/9/00	ESTABLISHMENT NO. AND NAME 2060, Malton Bacon Factory, Ltd.	CITY Norton/Malton
			COUNTRY England
NAME OF REVIEWER Dr. Gary D. Bolstad	NAME OF FOREIGN OFFICIAL Drs. Andrew Gauldie, Alistair Booth	EVALUATION <input type="checkbox"/> Acceptable <input checked="" type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable	

COMMENTS:

04 No hand soap dispensers were present at either the viscera inspection station or the inspection station for the cervical lymph nodes. Establishment officials agreed to install soap dispensers promptly.

11 Light was inadequate at some inspection stations. A light intensity of 50 foot-candles (fc) of shadow-free light is required by FSIS at the inspection surfaces. The auditor measured 15 fc in abdominal cavities, 20 fc at cervical lymph nodes, and, even with no carcasses present, 30 fc at the level of the shoulders. Establishment officials agreed to install compliant lighting promptly.

18/30/35 Condensation was found to be dripping onto exposed product in carcass coolers 2 and 3 and on one processing line. Effective corrective actions were not immediate, but were eventually taken by the senior MHS representative.

18/33 Maintenance and cleaning of over-product equipment at the entrance to the retained carcass room, the head recovery area, and carcass cooler #4 had been seriously neglected, as evidenced by the presence of heavy buildups of rust, flaking paint, and/or old, dried meat scraps, dry and caked grease, etc. Inspection officials ordered improved maintenance, cleaning, and monitoring.

26/28 An edible product worker, wearing his scabbard, knife, and steel, was sweeping meat scraps from the floor, and handling floor-cleaning equipment (broom and shovel). Corrective actions by the establishment officials were immediate.

38 Swine were not observed from both sides in motion during ante-mortem inspection. The veterinarian in charge said he was aware of the requirement but had neither the time nor the assistance he would need to accomplish this. The requirement was discussed with senior meat inspection officials during the exit meeting from the country; they expressed their intention to ensure correction.

76 Monthly supervisory visits were initiated in September 1999. Since then the visits had been performed, and reports generated, by the Principal Official Veterinary Surgeon during each calendar month.

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE INTERNATIONAL PROGRAMS		REVIEW DATE	ESTABLISHMENT NO. AND NAME		CITY
FOREIGN PLANT REVIEW FORM		5/11/2000	2134, Malton Bacon Factor, Ltd.		Ossett
					COUNTRY England
NAME OF REVIEWER Dr. Gary D. Bolstad		NAME OF FOREIGN OFFICIAL Drs. Marta Aguirre, Elis. Geisen, A Booth		EVALUATION <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/Re-review <input type="checkbox"/> Unacceptable	
CODES (Give an appropriate code for each review item listed below) A = Acceptable M = Marginally Acceptable U = Unacceptable N = Not Reviewed O = Does not apply					
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Hand washing facilities	04 M	(d) ESTABLISHMENT SANITATION PROGRAM		Inspector monitoring	60 A
Sanitizers	05 A	Effective maintenance program	33 A	Processing schedules	61 O
Establishments separation	06 A	Preoperational sanitation	34 A	Processing equipment	62 N
Pest --no evidence	07 A	Operational sanitation	35 A	Processing records	63 N
Pest control program	08 A	Waste disposal	36 A	Empty can inspection	64 O
Pest control monitoring	09 A	2. DISEASE CONTROL		Filling procedures	65 O
Temperature control	10 A	Animal identification	37 O	Container closure exam	66 O
Lighting	11 A	Antemortem inspec. procedures	38 O	Interim container handling	67 O
Operations work space	12 A	Antemortem dispositions	39 O	Post-processing handling	68 A
Inspector work space	13 A	Humane Slaughter	40 O	Incubation procedures	69 O
Ventilation	14 A	Postmortem inspec. procedures	41 O	Process. defect actions -- plant	70 N
Facilities approval	15 A	Postmortem dispositions	42 O	Processing control -- inspection	71 N
Equipment approval	16 A	Condemned product control	43 O	5. COMPLIANCE/ECON. FRAUD CONTROL	
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control	44 A	Export product identification	72 A
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Antemortem facilities	22 O	Approval of chemicals, etc.	49 A	Shipment security	78 A
Welfare facilities	23 A	Storage and use of chemicals	50 A	Species verification	79 O
Outside premises	24 A	4. PROCESSED PRODUCT CONTROL		"Equal to" status	80 A
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim	51 A	Imports	81 A
Personal dress and habits	25 A	Boneless meat reinspection	52 A	SSOPs	82 A
Personal hygiene practices	26 A	Ingredients identification	53 A	HACCP	83 A
Sanitary dressing procedures	27 O	Control of restricted ingredients	54 O		

FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE	ESTABLISHMENT NO. AND NAME	CITY
	5/11/2000	2134, Malton Bacon Factor, Ltd.	Ossett
			COUNTRY
			England
NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL	EVALUATION	
Dr. Gary D. Bolstad	Drs. Marta Aguirre, Elis. Geisen , A Booth	<input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable	

COMMENTS:

04 There was no hand wash station or sterilizer at the dropped meat trimming station. Establishment officials agreed to install the necessary equipment promptly.

17 Numerous inadequately-sealed openings in ceiling, where pipes, wires, etc. passed through, were observed. Prompt sealing of the openings was scheduled.

22/28 The dropped-meat trimmer was observed to contact the inedible container with his hands. The veterinarian in charge took immediate corrective actions: the trimmer washed his hands before continuing his operations.

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE INTERNATIONAL PROGRAMS FOREIGN PLANT REVIEW FORM	REVIEW DATE 5/12/2000	ESTABLISHMENT NO. AND NAME 2182, Nippress Cold Storage (UK) Ltd	CITY Kingston-upon-Hull
			COUNTRY England

NAME OF REVIEWER Dr. Gary D. Bolstad	NAME OF FOREIGN OFFICIAL Drs. Simon Cherry, E. Meisner, Alistair Cook	EVALUATION <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable
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CODES (Give an appropriate code for each review item listed below)
 A = Acceptable M = Marginally Acceptable U = Unacceptable N = Not Reviewed O = Does not apply

1. CONTAMINATION CONTROL		Cross contamination prevention	28 A	Formulations	55 O
(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing	29 A	Packaging materials	56 O
Water potability records	01 A	Product handling and storage	30 A	Laboratory confirmation	57 O
Chlorination procedures	02 O	Product reconditioning	31 O	Label approvals	58 O
Back siphonage prevention	03 A	Product transportation	32 A	Special label claims	59 O
Hand washing facilities	04 A	(d) ESTABLISHMENT SANITATION PROGRAM		Inspector monitoring	60 A
Sanitizers	05 A	Effective maintenance program	33 A	Processing schedules	61 O
Establishments separation	06 A	Preoperational sanitation	34 A	Processing equipment	62 O
Pest --no evidence	07 A	Operational sanitation	35 A	Processing records	63 O
Pest control program	08 A	Waste disposal	36 A	Empty can inspection	64 O
Pest control monitoring	09 A	2. DISEASE CONTROL		Filling procedures	65 O
Temperature control	10 A	Animal identification	37 O	Container closure exam	66 O
Lighting	11 A	Antemortem inspec. procedures	38 O	Interim container handling	67 O
Operations work space	12 A	Antemortem dispositions	39 O	Post-processing handling	68 O
Inspector work space	13 O	Humane Slaughter	40 O	Incubation procedures	69 O
Ventilation	14 A	Postmortem inspec. procedures	41 O	Process. defect actions -- plant	70 O
Facilities approval	15 A	Postmortem dispositions	42 O	Processing control -- inspection	71 O
Equipment approval	16 O	Condemned product control	43 O	5. COMPLIANCE/ECON. FRAUD CONTROL	
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control	44 O	Export product identification	72 A
Over-product ceilings	17 A	Returned and rework product	45 O	Inspector verification	73 A
Over-product equipment	18 A	3. RESIDUE CONTROL		Export certificates	74 A
Product contact equipment	19 A	Residue program compliance	46 O	Single standard	75 A
Other product areas (inside)	20 A	Sampling procedures	47 O	Inspection supervision	76 M
Dry storage areas	21 A	Residue reporting procedures	48 O	Control of security items	77 A
Antemortem facilities	22 O	Approval of chemicals, etc.	49 A	Shipment security	78 A
Welfare facilities	23 A	Storage and use of chemicals	50 A	Species verification	79 O
Outside premises	24 A	4. PROCESSED PRODUCT CONTROL		"Equal to" status	80 A
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim	51 O	Imports	81 A
Personal dress and habits	25 A	Boneless meat reinspection	52 O	SSOPs	82 A
Personal hygiene practices	26 A	Ingredients identification	53 O		
Sanitary dressing procedures	27 O	Control of restricted ingredients	54 O		

FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE 5/12/2000	ESTABLISHMENT NO. AND NAME 2182, Nippress Cold Storage (UK) Ltd	CITY Kingston-upon-Hull
			COUNTRY England
NAME OF REVIEWER Dr. Gary D. Bolstad	NAME OF FOREIGN OFFICIAL Drs. Simon Cherry, E. Meisner, Alistair Cook		EVALUATION <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable

COMMENTS:

76 No documented official visits had as yet been made by the supervising veterinarian (Principal Official Veterinary Surgeon). She had not been informed of the requirement. This will be rectified promptly.

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE INTERNATIONAL PROGRAMS		REVIEW DATE	ESTABLISHMENT NO. AND NAME		CITY
FOREIGN PLANT REVIEW FORM		5/10/2000	2205, Frigoscandia Distribution, Ltd.		South Kirkby
				COUNTRY	England
NAME OF REVIEWER Dr. Gary D. Bolstad		NAME OF FOREIGN OFFICIAL Drs. Susana Oliveros, Alistair Booth		EVALUATION <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable	
CODES (Give an appropriate code for each review item listed below) A = Acceptable M = Marginally Acceptable U = Unacceptable N = Not Reviewed O = Does not apply					
1. CONTAMINATION CONTROL		Cross contamination prevention	28 A	Formulations	55 O
(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing	29 O	Packaging materials	56 O
Water potability records	01 A	Product handling and storage	30 A	Laboratory confirmation	57 O
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Inspector work space	13 O	Humane Slaughter	40 O	Incubation procedures	69 O
Ventilation	14 A	Postmortem inspec. procedures	41 O	Process. defect actions -- plant	70 O
Facilities approval	15 A	Postmortem dispositions	42 O	Processing control -- inspection	71 O
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FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE	ESTABLISHMENT NO. AND NAME	CITY
	5/10/2000	2205, Frigoscandia Distribution, Ltd.	South Kirkby
			COUNTRY
			England
NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL		EVALUATION
Dr. Gary D. Bolstad	Drs. Susana Oliveros, Alistair Booth		<input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable

COMMENTS:

76 Supervisory visits to this cold-store facility were organized in the summer of 1999. The supervising veterinarian (Principal Official Veterinary Surgeon), due to an injury, was unable to start these until October 1999. Since then there had been monthly visits, except that there was none in January 2000.



**Ministry of Agriculture, Fisheries and Food
State Veterinary Service**

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Your reference:
Our reference: **EXM 1255**

Mr Mark G Manis (By fax: 001 202 720 7900)
Director International Policy Division
Office of Policy, Programme Development and Evaluation
USDA Food Safety and Inspection Service
Washington DC 20250

22 November 2000

Dear Mr Manis

**FSIS AUDIT OF ENGLAND'S MEAT AND POULTRY INSPECTION SYSTEM 3-25
MAY 2000**

Thank you for your letter of 12 September regarding the above and for Dr Bolstad's very thorough audit report on the five establishments visited. Thank you also for Dr S P Singh's report on his audit of Great Britain's meat and poultry inspection system from February 15 to February 25 1999. It was useful to be able to compare the two successive reports and to note the progress made.

In response to your invitation, I should like to make the following comments on the corresponding paragraphs in Dr Bolstad's draft final audit report dated 24 August 2000:

Laboratory audits

1. Regarding the absence of an intra-laboratory check sample programme at the Laboratory of the Government Chemist (LGC), Mr Ray Anderson, Director of Policy of the MAFF Veterinary Medicines Directorate (VMD) - which has responsibility for the UK national residue surveillance scheme (NSS) - has pointed out that the LGC is required under its contract with VMD to participate in the Food Analysis Performance Assessment Scheme (FAPAS), an internationally recognised proficiency test scheme and to copy the FAPAS results to VMD. LGC also participates in ring trials organised by EU reference laboratories. In addition, VMD is now considering the implementation of a check sample programme within LGC.
2. Regarding the time taken to analyse and report on samples, Mr Anderson comments that the NSS is designed to meet the requirements of European Community Directive 96/23/EC. This directive does not specify a time limit for the screening of samples, and the throughput time may depend on factors such as the batching of frozen samples for a particular type of analysis. The NSS is a large scale monitoring exercise and, as such, carcasses are not routinely held at abattoirs pending the outcome of residue tests. However,

official inspectors at slaughterhouses have powers to detain carcasses from animals or batches of animals which are suspected of containing illegal substances or elevated residues levels. Samples from suspect animals are analysed by the LGC under a fast track system, with results expected within five days, and the carcasses are permitted to enter the food chain only on receipt of satisfactory test results.

Basic establishment facilities

1. The lack of specific handwashing facilities at establishments 2060 and 2134 has been rectified. At establishment 2060, soap dispensers have been installed at the viscera and head inspection stations; at establishment 2134 handwash facilities and a knife steriliser have been installed at the meat re-inspection station.
2. At establishment 2060, illumination at inspection stations has been increased and further steps are being taken to achieve a light intensity of 50 foot-candles at all points in the carcass zone inspected at each station.
3. The overhead rails in the detained room at 2060 have been replaced and the redundant rail at the "head hatch" in carcass chiller No 4 has been removed. Maintenance and cleaning of other over-product equipment mentioned by Dr Bolstad has been completed.

Cross-contamination

At establishment 2134, personnel involved in cleaning/sweeping are now dedicated to that purpose and do not handle product.

Product handling and storage

1. At establishment MK020¹ inspection and, where necessary, rejection of meat intended for grinding has been reviewed; as have the protective covering of meat in transit and the use of wooden pallets.
2. At establishment 2060, structural action is being taken to prevent overhead condensation forming in the 'product zone' in carcass chillers or processing lines.

Personnel hygiene and practices

At establishment 2060, edible product workers are no longer required or permitted to handle floor-cleaning equipment.

Inspection system controls

1. At establishment 2060, arrangements have been made to conduct ante-mortem inspections of pigs which are delivered during the day as they leave the delivery vehicle; to reduce after-hours deliveries and to inspect in motion pigs which have spent the night in the lairage.
2. At establishment MK020, the defect criteria for boneless meat reinspection have been updated to reflect the zero-tolerance policy for faeces and ingesta.

Species verification

We believe that the existing system, as described in my letter of 14 April 2000, provides guarantees equivalent to species testing and we await a formal ruling on this point.

¹ This establishment is licensed for the production and export of minced meat by the local Food Authority under the central government Department of Health, and therefore has a local authority alpha-numeric number, ie Milton Keynes Council establishment No 20.

Monthly reviews

1. Supervisory visits are made to all establishments eligible to export to the USA and written reports submitted to this office. Establishments which are actively exporting (ie, 2060 and 2205) receive monthly supervisory visits from a POVS² and annual audit visits from a VMHA³. The requirement for supervisory visits to establishments which are not actively exporting is met by annual VMHA audits. Should any problems occur at an approved establishment, further POVS and/or VMHA visits would be scheduled as required.
2. As regards establishment 2182 : this was first approved for US trade on 20 July 1999 but, at the time of the FSIS audit on 12 May, had not been involved in exports to the USA. Our understanding was, therefore, that a supervisory visit was due by 21 July 2000., and a VMHA annual audit has subsequently been carried out.

Establishment 5049 : Bernard Matthews Foods Limited, Halesworth

The reasons for the delisting of this plant were set out in my letter of 4 April 2000 : chiefly that the company, had not exported to the USA for a number of years and was finding it increasingly difficult to justify the cost of PR/HACCP compliance. A further problem was the necessity to operate at different line speeds for US and domestic (GB and EU) production. I thank you for clarifying this policy issue; I will ensure that FSIS is offered the opportunity to review this establishment prior to any future relisting.

General

Action has also been taken in respect of deficiencies which were identified by Dr Bolstad in the individual establishment audit reports but which were not detailed in the final report. For example, following Dr Bolstad's remarks concerning insectocutor location at 2060, a company review of the siting of all electric fly killers (EFK) in the establishment was carried out. The EFK location plan has been updated, two new EFKs have been installed and 13 EFKs have been moved away from the product zone.

Matters for clarification

We should be grateful for guidance on the following questions, which arose during the visit:

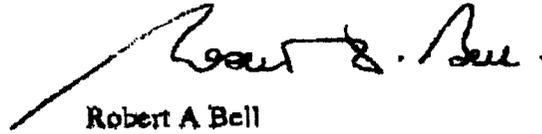
1. Our understanding of the USDA system is that microbiological sampling for generic *E. coli* is required only in slaughter establishments (ie 2060) and that testing for salmonella is required in slaughter and grinding plants (ie 2060 and MK020). We should appreciate confirmation of this.
2. Dr Bolstad referred to an equivalence determination by the US Office of Policy, Program Development and Evaluation in respect of the turnaround time for routine samples and the check sample system in place at the LGC. We look forward to receiving this.
3. Guidance is requested on the frequency of the salmonella sampling sets at establishment 2060, and as to whether the current sampling regime at this establishment is unnecessarily frequent.
4. We are unsure whether the requirement for monthly supervisory visits applies to establishments such as 2205, which stores meat intended for the USA, but is not involved in production or processing. Advice on this point will be much appreciated

² Principal Official Veterinary Surgeon - employed by the Meat Hygiene Service.

³ Veterinary Meat Hygiene Adviser - employed by the Food Standards Agency.

In conclusion, I should like to thank Dr Bolstad for a rigorous but very fair and informative audit programme.

Yours sincerely

A handwritten signature in black ink, appearing to read "Robert A. Bell". The signature is written in a cursive style with a long, sweeping underline that extends to the left.

Robert A Bell
Head of Veterinary International Trade

cc: Mr S. Knight
Agricultural Economist
United States Embassy
London

Mr A. Wilson
First Secretary (Agriculture & Trade Policy)
British Embassy
Washington DC