



United States
Department of
Agriculture

Food Safety
and Inspection
Service

Washington, D.C.
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Dr. Eliezer Nili
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State of Israel
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Israel

APR 12 2001

Dear Dr. Nili:

Enclosed is a copy of the Final report of the Food Safety and Inspection Service (FSIS) on-site audit of Israel's poultry inspection system. This audit was conducted from May 4 through May 17, 2000. We received your letter dated December 20, 2000, with your comments regarding the corrective actions taken and your assurance that exported product meets the necessary FSIS inspection standards. This letter has been incorporated into the final report as Attachment "G."

If you have any questions regarding the audit or need additional information, please contact me at telephone number 202-720-3781 or facsimile number 202-690-4040.

Sincerely,

Sally Stratmoen, Chief
Equivalence and Planning Section
International Policy Division
Office of Policy, Program Development
and Evaluation

Enclosure



AUDIT REPORT FOR ISRAEL

May 4 through May 17, 2000

INTRODUCTION

Background

This report reflects information that was obtained during an audit of Israel's poultry inspection system from May 4 through May 17, 2000. Eight of the sixteen establishments certified to export poultry to the United States were audited. Five of these were slaughter establishments; the other three were conducting processing operations.

The last audit of the Israeli poultry inspection system was conducted in January 1999. Fourteen establishments were audited. Establishments 3, 9, 11, 14, 18, 19, 22, 52, 101, 104, 108, 109, 118, and 119 were acceptable. No serious deficiencies were reported at that time. HACCP-implementation was deficient in one of the fourteen establishments visited (Est. 14). During this new audit, Establishment 14 was included in the new itinerary for records review. The major concerns from the previous audit were the following:

1. Exposed edible products were not handled in a sanitary manner in Establishments 3, and 9. *During this audit, this deficiency was found to have been corrected.*
2. Gaps at the sides of doors and a few openings through the walls to the outside were not sealed properly to prevent the entrance of rodents and other vermin in the dry storage, shipping, and receiving rooms in Establishments 9, 11, 18, and 119. No evidence of rodents or other vermin was observed at the time of the review. *The documents indicated that this had been corrected except in Establishment 9.*
3. The laboratory quality assurance program needed improvement. *The laboratory quality assurance program was improved but still needed more improvements.*
4. The species verification program was not carried out as required by FSIS. *Species verification testing is carried out on cooked poultry products intended for export to the U. S. as referred to Dr. E. Nili's letter dated March 6, 2000. This was verified during this on-site audit.*
5. The HACCP program was not implemented in Establishment 14. *The documents indicated that this deficiency had been rectified.*

The major concerns from the new audit were the following:

1. The HACCP plan did not state adequately the procedures that the establishment will use to verify that the plan is being effectively implemented and the frequencies with which these procedures will be performed. Neither establishment personnel nor GOI inspection officials were performing adequate ongoing verification activities of the HACCP program.
2. The zero-tolerance policy for visible fecal material on carcass was not enforced by the GOI inspection officials and establishment personnel, and no monitoring record was maintained to verify this activity in Establishments 3, 5, 9, 11, 14, 18, and 19.
3. Both establishment and inspection personnel had been unaware of the requirement for a pre-shipment review of all documentation pertaining to the monitoring of critical limits and, if appropriate, documentation, that corrective actions were taken, including the proper disposition of the product, for each shipment eligible for export to the U.S. The auditor explained the requirements for this pre-shipment review in detail. GOI meat inspection officials indicated they would implement this requirement promptly.
4. The intralaboratory check samples program was not adequately maintained. No check samples for chlorinated hydrocarbons and organophosphates were carried out in March or April 2000, and no check samples at all were being done for hormones, trace elements, chloramphenicol, sulfonamides, or antibiotics as required. This is a repeat deficiency from last audit.

Israel exports only poultry processed products to the United States. Restrictions are placed on Israeli fresh poultry due to presence of Newcastle disease. Meat products are ineligible because USDA does not recognize Israel's meat inspection system as equivalent.

During the period of January 1, 2000, to March 31, Israeli establishments exported 936,243 pounds of processed turkey and chicken to the U.S. Port-of-entry rejections were for net weight violations (1.46% of the total), missing shipping marks (0.02%).

PROTOCOL

This on-site audit was conducted in four parts. One part involved visits with Israeli national poultry inspection officials to discuss oversight programs and practices, including enforcement activities. The second entailed an audit of a selection of records in the poultry inspection headquarters facilities preceding the on-site visits. Establishments 3, 5, 9, 19, 52, 104, 108, and 186 were selected randomly for on-site-audits and Establishments 11, 14, 18, 22, 101, 118, and 119 were selected for records reviews. The third was conducted by on-site visits to establishments. 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*.

Program effectiveness determinations focused on 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. Israel's inspection system was assessed by evaluating these five risk areas.

During all on-site establishment visits, the auditor evaluated the nature, extent, and degree to which findings impacted on food safety and public health, 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. This was the case with Establishment 5 (see below).

RESULTS AND DISCUSSION

Summary

Eight establishments, Ests. 3,5,9,19,52,104, 108, and 186 were audited; two establishments, Ests. 3 and 19 were recommended for re-review. One establishment, Est. 5, was found to be unacceptable. Details of audit findings, including compliance with HACCP, SSOPs, and testing programs for *Salmonella* and generic *E. coli* are discussed later in this report.

As stated above, major concerns had been identified during the last audit of the Israeli poultry inspection system, conducted in January 1999. During this new audit, the auditor determined that most major concerns had been addressed and corrected.

During this new audit, a few deficiencies were found in the implementation of the required HACCP programs in fifteen establishments (eight for on-site audits and seven for records audits) visited. Details are provided in the Slaughter/ Processing Controls section later in this report.

Entrance Meeting

On May 4, an entrance meeting was held in Tel Aviv with Dr. Oded Nir (Markusfeld), Director of Veterinary Services and Animal Health (VSAH); Dr. Isaac Klinger, Deputy Director of Veterinary Services and Animal Health; Dr. Eliezer Nili, Director, Control of Animal Products; Dr. Michael Hirik, Area Supervisor, Southern District; Dr. Karol Vigvari, Area Supervisor, Northern District; and Dr. Roint Davidovitch, HACCP Project Manager and Dr. Faizur Choudry, International Audit Staff Officer. Topics of discussion included the following:

1. Updates on the inspection system of Israel
2. The audit itinerary and travel arrangements
3. Delisting issues
4. Generic *E. coli* and *Salmonella* and *Listeria* testing and species verification program.
5. HACCP implementation
6. SSOP implementation

Headquarters Audit

There had been no changes in the organizational structure or upper levels of inspection staffing since the last U.S. audit of Israel's inspection system in January 1999.

To gain an accurate overview of the effectiveness of inspection controls, FSIS requested that the audits of the individual establishments be led by the inspection officials who normally conduct the periodic 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 pertaining to the establishments listed for records review. This records review was conducted at the Ministry of Agriculture and Rural Development in Tel Aviv and in establishments. The records review focused primarily on food safety hazards and included the following:

- Internal review reports.
- Supervisory visits to establishments that were certified to export to the U.S.
- Training records for inspectors and laboratory personnel.
- Label approval records such as generic labels.
- New laws and implementation documents such as regulations, notices, directives and guidelines.
- Sampling and laboratory analyses for residues.
- Pathogen reduction and other food safety initiatives such as SSOPs, HACCP programs, generic *E. coli* testing and *Salmonella* testing.
- Sanitation, slaughter and processing inspection procedures and standards.
- Control of inedible and condemned materials.
- Export product inspection and control including export certificates.
- Enforcement records including examples of criminal prosecution, consumer complaints, recalls, seizure and control of noncompliant product, and withholding, suspending, withdrawing inspection services from or delisting an establishment that is certified to export product to the United States.

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

1. The HACCP plan did not specify critical limits, monitoring procedures and monitoring frequencies performed for each CCP adequately.

2. The HACCP plan did not state adequately the procedures that the establishment will use to verify that the plan is being effectively implemented and the frequencies with which these procedures will be performed. Neither establishment personnel nor GOI inspection officials were performing adequate ongoing verification activities of the HACCP program.
3. Corrective actions to be followed in response to a deviation from a critical limit not addressed in the written HACCP plan.
4. The zero-tolerance policy for visible fecal material on carcass was not enforced by the GOI inspection officials and establishment personnel, and no monitoring record was maintained to verify this activity in Establishments 3, 5, 9, 11, 14, 18, and 19.
5. Both establishment and inspection personnel had been unaware of the requirement for a pre-shipment review of all documentation pertaining to the monitoring of critical limits and, if appropriate, documentation that corrective actions were taken, including the proper disposition of the product, for each shipment eligible for export to the U.S. The auditor explained the requirements for this pre-shipment review in detail; GOI meat inspection officials indicated to implement this requirement promptly.

Government Oversight

All inspection veterinarians and inspectors in establishments certified by Israel as eligible to export poultry products to the United States were full-time government employees, receiving no remuneration from either industry or establishment personnel.

Establishment Audits

Sixteen establishments were certified to export poultry products to the United States at the time this audit was conducted. Eight establishments, Est. 3,5,9, 19,52, 104, 108, and 186 were visited for on-site audits.

With the exception of Establishment 5, corrective actions were prompt and effective.

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 Kimron Veterinary Institute, National Residue Control Laboratory in Beit Dagan was audited on May 17, 2000. The Institute for Food Microbiology and Consumer Goods in Tirat Carmel was audited on May 14, 2000. Except as noted below, effective controls were in place for sample handling and frequency, timely analysis, data reporting, tissue matrices for analysis, equipment operation and printouts, minimum detection levels, recovery frequency, and percent recovery. The methods used for the analyses were acceptable. No compositing of samples was done.

The check sample program was not adequately maintained such as, the intralaboratory check samples for chlorinated hydrocarbons and organophosphates were not carried out in March and April in 2000, and for hormones, trace elements, chloramphenicol, sulfonamides and antibiotics were not carried out as required by FSIS. Polychlorinated biphenyls (PCB's) were not analyzed as required by FSIS. Dr. Eliezer Nili, indicated that with respect to residue control program, he complied with Mr. Mark Manis, Director, International Policy Division, Office of Policy, Program Development and Evaluation, FSIS, letter dated December 31, 1997, which stated that each country determine which compounds should be included in its annual residue sampling plan and he decided not to. The following information was not recorded in the official record books for Laboratory Quality Assurance Program.

1. Lot numbers, expiration dates and where the standard solutions/reagents/media ingredients were purchased, were not recorded in the standards books.
2. The record books were not signed and verified by the supervisors each time before the newly prepared solutions were used by the technicians or chemists.
3. No record was maintained for the corrective actions taken when unacceptable check sample results were received.

Israel's microbiological testing for *Salmonella* was being performed in private laboratories. One of these, the Institute for Food Microbiology and Consumer Goods laboratory in Tirat Carmel was audited on May 14, 2000, and found acceptable. The auditor determined that the system met the criteria established for the use of private laboratories under FSIS's Pathogen Reduction/HACCP rule. These criteria are:

1. The laboratories were 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.

Establishment Operations by Establishment Number

The following operations were being conducted in the eight establishments:

Kosher - chicken slaughter and cut-up – two establishments (5 and 9)

Kosher- turkey slaughter and cut-up – two establishments (3 and 19)

Fried chicken patties – one establishment (186)

Cooked Sausages, cured and smoked products – one establishment (52, 104, and 108)

SANITATION CONTROLS

Based on the on-site audits of establishments, Israel's inspection system had controls in place for water potability records; chlorination procedures; back-siphonage prevention; hand washing facilities; sanitizers; separation of operations; pest control and monitoring; temperature control; lighting; work space; ventilation; maintenance and cleaning of over-product ceilings and equipment; dry storage areas; personal dress, habits, and hygiene; equipment sanitizing; product handling, storage, and transportation; antemortem facilities; welfare facilities; and outside premises.

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. The following deficiencies were noted.

Cross-Contamination

1. Turkey carcasses were found with grease and rail dust and were not effectively trimmed for defects at the pre-boning trim station in Establishment 3.
2. Several turkey carcasses were found with grease contamination and were not effectively trimmed for defects at the pre-boning station in Establishment 19.
3. Turkey carcasses were contacting the work platform and employees' boots at the turkey transfer station in the cut-up room. Edible product was contacting contaminated racks through the perforated bottoms of plastic containers in the boning room and coolers in Establishment 3.
4. Water was leaking from an overhead pipe onto a chicken rack at the hock cutter station. A carton conveyor passing over exposed product areas was not protected to prevent any fallout onto the product underneath in the cut-up and packaging rooms in Est. 5.

5. Cleaned edible product containers were passing through dirty plastic strip curtains from the container washing room to the boning room in Establishment 9.
6. Turkey carcasses were contacting a contaminated hose at the eviscerating line. A cleaning rod for the turkey thoracic cavity was contacting the contaminated trough during rinsing prior to reuse in the slaughter room in Establishment 19.
7. Establishment employee was not washing his hands before handling edible product after using dirty equipment to open grinding machine in Establishment 52.
8. Dripping condensate from overhead refrigeration units, ducts, and ceilings that were not cleaned/sanitized daily was falling onto exposed edible product, and packaged boxes of meat in the cooler, cut-up room, packaging room, shipping room, and slaughter room in Establishment 5.
9. Dripping condensate from overhead refrigeration units and ceilings that were not cleaned/sanitized daily was falling onto packaged meat boxes and edible product containers covered with plastic in the defrosting and packaging room in Est. 52.
10. Dripping condensate from ceilings that were not cleaned/sanitized daily was falling on exposed product in the boning room in Establishment 9.
11. Dripping water from a rusty ice machine frame that was not cleaned/sanitized daily was falling into the ice container in the ice room in Establishment 52.

Basic Establishment Facilities

1. A sanitizer was not maintained at the required temperature in the chicken cut-up room in Establishment 5.
2. Neither establishment personnel nor GOI inspection officials had adequate knowledge of or control over the use of insecticides and rodenticides by the contracted pesticide company "Lenglive Eitan Sanitation and Pesticide Control, Limited". Gaps at the bottom and sides of door, openings to the outside at the junction of walls and ceilings were not sealed properly in the shipping room and the entrance to employees' locker room to prevent the entrance of rodents and other vermin in Establishment 5.
3. There was no door to separate the slaughter room from the product receiving and water pump room to prevent the entrance of rodents and other vermin in Establishment 9.
4. Gaps at the bottoms of door in the product shipping room were not sealed properly to prevent the entrance of rodents and other vermin in Establishment 19.

Condition of Facilities Equipment

1. Condensate from ceilings that were not cleaned/sanitized daily was dripping in the chicken cut-up room and cooler in Establishment 19. No product was underneath at the time of the audit.
2. Dripping condensate from overhead refrigeration units, and ceilings that were not cleaned/sanitized daily, was falling onto packaged meat product in two coolers in Establishment 104.
3. A product wrapping machine that was ready for use but not in use, in the packaging room was observed with dried fat, meat and flaking paint and seams at the junctions of boning tables and stands and also numerous edible product containers were not sealed completely in the boning room in Establishment 3.
4. In the product packaging and mechanical deboning room, conveyor belts were found with grease and deep cuts, and were extensively deteriorated, racks used for un-packaged and packaged product were observed with dried fat, meat, and extraneous material in Establishment 5.
5. Overhead beams and supports between the freezer and shipping rooms, ceilings in the mechanical deboning room, and electrical cables in the cut-up and packaging rooms were observed with accumulations of dust, dirt, extraneous material, and flaking paint in Establishment 5.
6. All chutes for edible product between cut-up and packaging rooms did not have smooth surfaces and were cracked; packaging material was stored underneath steps and was not protected to prevent any fallout; a build-up of dust and debris was observed at the entrance to the carton conveyor chutes in the dry storage room in Establishment 5.
7. Processed product packaging machines were too close to an open drain with running water, with a potential for splash contamination from drain water in the processing room in Establishment 104.
8. A buildup of dust, debris and feathers was observed on the floor, and covings on the walls and floor junctions were not sealed properly to prevent the entrance of rodents and other vermin in the dry storage room in Establishment 3.
9. A buildup of dust and debris was observed on the floor and some packaging materials were stored on the floor and gaps at the bottom of door were not protected to prevent the entrance of rodents and other vermin in the dry storage
9. The daily pre-operational and operational SSOPs records did not reflect the actual sanitary conditions observed in Establishment 5.

ANIMAL DISEASE CONTROLS

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

1. Edible and inedible product containers were not identified in the boning and slaughter rooms in Establishments 3, 5, and 9.
2. Edible and inedible product containers were not identified in the processing room in Establishment 108.

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

There were adequate animal identification and traceback, humane handling and slaughter of animals and control of condemned products.

RESIDUE CONTROLS

Israel's National Residue Testing Plan for 1999 was being followed, and was on schedule. Except as noted below, the Israel's inspection system had adequate controls in place to ensure compliance with sampling and reporting procedures and storage and use of chemicals.

(Please see laboratory audit section)

SLAUGHTER/PROCESSING CONTROLS

Israel's inspection system had controls in place to ensure adequate animal identification; antemortem inspection procedures; antemortem disposition, humane slaughter; postmortem inspection procedures; postmortem dispositions; condemned product control; restricted product control; ingredients identification; control of restricted ingredients; formulations; processing schedules, equipment and records, and processing controls of cured, dried, smoked products and cooked sausages.

HACCP Implementation

All establishments approved to export poultry 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 audited and found to meet the basic FSIS regulatory requirements, with the following variations:

1. The HACCP plan did not specify critical limits, monitoring procedures and monitoring frequencies performed for each CCP adequately.
2. The HACCP plan did not state adequately the procedures that the establishment will use to verify that the plan is being effectively implemented and the frequencies with which these procedures will be performed. Neither establishment personnel nor GOI inspection officials were performing adequate ongoing verification activities of the HACCP program.
3. Corrective actions to be followed in response to a deviation from a critical limit not addressed in the written HACCP plan.
4. The zero-tolerance policy for visible fecal material on carcass was not enforced by the GOI inspection officials and establishment personnel, and no monitoring record was maintained to verify this activity in Establishments 3, 5, 9, 11, 14, 18, and 19.
5. Both establishment and inspection personnel had been unaware of the requirement for a pre-shipment review of all documentation pertaining to the monitoring of critical limits and, if appropriate, documentation that corrective actions were taken, including the proper disposition of the product, for each shipment eligible for export to the U.S. The auditor explained the requirements for this pre-shipment review in detail; GOI meat inspection officials indicated to implement this requirement promptly.

Testing for Generic *E. coli*.

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

The *E. coli* testing program was audited and found to meet the basic FSIS regulatory requirements.

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

ENFORCEMENT CONTROLS

Inspection System Controls

Except as noted below, and with the exception of the unacceptable establishment (Est. 5), the GOI inspection system controls [ante-and post-mortem inspection procedures and dispositions, control of restricted product and inspection samples, control and disposition of dead, dying, diseased or disabled animals, boneless meat reinspection, shipment security, including shipment between establishments, prevention of commingling of product intended for export to the United States with domestic product, monitoring and verification of establishment programs and controls (including the taking and documentation of corrective actions under HACCP plans), inspection supervision and documentation, importation of only eligible poultry products from other countries (i.e., only from eligible countries and certified establishments within those countries), and the importation of only eligible poultry products from other countries for further processing] were in place and effective in ensuring that products produced by the establishment were wholesome, unadulterated, and properly labeled. In addition, adequate controls were found to be in place for security items, shipment security, and products entering the establishments from outside sources.

Testing for *Salmonella* Species

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

Israel has adopted the FSIS regulatory requirements for *Salmonella* testing.

The *Salmonella* testing programs were found to meet the basic FSIS regulatory requirements.

Listeria monocytogenes

1. The control of *Listeria monocytogenes* is not included in the HACCP plan in Establishments 22, 52, 101, 104, 108, 118, 119, and 186.
2. GOI inspection service has a surveillance program for *Listeria monocytogenes* testing (one sample from each shipment intended for export to the U. S.).

Species Verification Testing

At the time of this audit, Israel was not exempt from the species verification testing requirement. The auditor verified that species verification testing was being conducted in accordance with FSIS requirements (criteria for sampling: less than 500 kilos one sample, 500 kilos to 5 tons 3 samples, and more than 5 tons 6 samples).

Monthly Reviews

These reviews were being performed by Dr. Karol Vigvari, Area Supervisor, Northern District, and Dr. Michael Hirik, Area Supervisor, Southern District.

The internal review program was applied equally to both export and non-export establishments. Internal review visits were both announced and not announced in advance, and were conducted, at times, by individuals, and at other times by a team of reviewers, at least once monthly. The records of audited establishments were kept in the inspection offices of the individual establishments and at the office of the Director, Control of Animal Products in Tel Aviv.

In the event that an establishment is found, during one of these internal reviews, to be out of compliance with U.S. requirements, and is delisted for U.S. export before it may again qualify for eligibility to be reinstated, a commission is empowered to conduct an in-depth review, and the results are reported to Dr. Oded Nir (Markusfeld), Director of Veterinary Services and Animal Health, for evaluation.

Enforcement Activities

Controls were in place to ensure adequate export product identification, inspector verification, export certificates, a single standard of control throughout the establishments, inspection supervision as required, and adequate controls for security items, shipment security, species verification, and products entering the establishments from outside sources.

Exit Meetings

An exit meeting was conducted in Beit Dagan on May 17, 2000. The Israel's participants were Dr. Oded Nir (Markusfeld), Director of Veterinary Services and Animal Health (VSAH); Dr. Isaac Klinger, Deputy Director, Veterinary Services and Animal Health; Dr. Eliezer Nili, Director, Control of Animal Products; Dr. Karol Vigvari, Area Supervisor, Northern District; and Dr. Roint Davidovitch, HACCP Project Manager; Mr. Tully Friedgut, Agricultural Specialist, American Embassy in Tel Aviv and Dr. Faizur Choudry, International Audit Staff Officer. The individual audit findings, as enumerated in the body of this report, were discussed.

The following deficiencies were discussed in detail:

1. The HACCP plan did not state adequately the procedures that the establishment will use to verify that the plan is being effectively implemented and the frequencies with which these procedures will be performed. Neither establishment personnel nor GOI inspection officials were performing adequate ongoing verification activities of the HACCP program.
2. The zero-tolerance policy for visible fecal material on carcass was not enforced by the GOI inspection officials and establishment personnel, in Establishments 3, 5, 9, and 19 observed on-site audit and Establishments 11, 14, and 18, on records audit.
3. Both establishment and inspection personnel had been unaware of the requirement for a pre-shipment review of all documentation pertaining to the monitoring of critical limits and, if appropriate, documentation that corrective actions were taken, including the proper disposition of the product, for each shipment eligible for export to the U.S. The auditor explained the requirements for this pre-shipment review in detail; GOI meat inspection officials indicated to implement this requirement promptly.
4. The intralaboratory check samples program was not adequately maintained: no check samples for chlorinated hydrocarbons and organophosphates were carried out in March or April 2000, and no check samples at all were being done for hormones, trace elements, chloramphenicol, sulfonamides, or antibiotics as required. This is a repeat deficiency from last audit.
5. Because of gross product contamination and lack of a single standard for pre-operational and operational SSOPs/equivalent programs and procedures and inadequate control over pest control programs, the sanitation status of Establishment 5 is not equivalent to that required in the U.S. program. Government of Israel (GOI) inspection service removed this establishment from the list of establishments eligible to export poultry and poultry products to the United States, effective May 16, 2000. The VSAH inspection officials stated that they would not certify this establishment until all the deficiencies corrected.

Israeli officials agreed to take the necessary steps to ensure that corrective actions and preventive measures, as promised during the audits and exit meetings in the individual establishments, would be implemented.

CONCLUSION

Eight establishments were audited: five were acceptable, two were evaluated as acceptable/re-review, and one was unacceptable. The deficiencies encountered during the on-site establishment audits, in those establishments which were found to be acceptable, were adequately addressed to the auditor's satisfaction. The VSAH inspection officials

reinforced the assurances made by field personnel during and at the conclusions of the on-site audits of the establishments, and stated that they would ensure prompt compliance.

The major concerns were the following:

1. The HACCP plan did not state adequately the procedures that the establishment will use to verify that the plan is being effectively implemented and the frequencies with which these procedures will be performed. Neither establishment personnel nor GOI inspection officials were performing adequate ongoing verification activities of the HACCP program.
2. The zero-tolerance policy for visible fecal material on carcass was not enforced by the GOI inspection officials and establishment personnel, in Establishments 3, 5, 9, and 19 observed on-site audit and Establishments 11, 14, and 18 on records audit.
3. Both establishment and inspection personnel had been unaware of the requirement for a pre-shipment review of all documentation pertaining to the monitoring of critical limits and, if appropriate, documentation that corrective actions were taken, including the proper disposition of the product, for each shipment eligible for export to the U.S. The auditor explained the requirements for this pre-shipment review in detail; GOI meat inspection officials indicated to implement this requirement promptly.
4. The intralaboratory check samples program was not adequately maintained: no check samples for chlorinated hydrocarbons and organophosphates were carried out in March or April 2000, and no check samples at all were being done for hormones, trace elements, chloramphenicol, sulfonamides, or antibiotics as required. This is a repeat deficiency from last audit.
5. Because of gross product contamination and lack of a single standard for pre-operational and operational SSOPs/equivalent programs and procedures and inadequate control over pest control programs, the sanitation status of Establishment 5 is not equivalent to that required in the U.S. program. Government of Israel (GOI) inspection service removed this establishment from the list of establishments eligible to export poultry and poultry products to the United States, effective May 16, 2000. The VSAH inspection officials stated that they would not certify this establishment until all the deficiencies corrected.

Dr. Faizur R. Choudry
International Audit Staff Officer

(signed) Dr. Faizur R. Choudry

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
- E. Laboratory audit form
- F. Individual Foreign Establishment Audit Forms
- G. Written Foreign Country's Response to the Draft Final Audit Report

Data Collection Instrument for SSOPs

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

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

The results of these evaluations were as follows:

Est. #	1. Written program addressed	2. Pre-op sanitation addressed	3. Oper. sanitation addressed	4. Contact surfaces addressed	5. Frequency addressed	6. Responsible indiv. identified	7. Documentation done daily	8. Dated and signed
3	√	√	√	√	√	√	√	√
5	√	√	√	√	√	√	√	√
9	√	√	√	√	√	√	√	√
19	√	√	√	√	√	√	√	√
52	√	√	√	√	√	√	√	√
104	√	√	√	√	√	√	√	√
108	√	√	√	√	√	√	√	√
186	√	√	√	√	√	√	√	√

1. The daily pre-operational and operational SSOPs records did not reflect the actual sanitary conditions observed in the establishment.

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

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
11	√	√	√	√	√	√	√	√
14	√	√	√	√	√	√	√	√
18	√	√	√	√	√	√	√	√
22	√	√	√	√	√	√	√	√
101	√	√	√	√	√	√	√	√
118	√	√	√	√	√	√	√	√
119	√	√	√	√	√	√	√	√

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	3. All hazards identified	4. Use & users included	5. Plan for each hazard	6. CCPs for all hazards	7. Monitoring is specified	8. Corr. act’s are described	9. Plan validated	10. Adequate verific. procedures	11. Adequate documentation	12. Dated and signed
3	√	√	√	√	√	√	√1	√2	√	√3	√	√
5	√	√	√	√	√	√	√1	√2	√	√3	√	√
9	√	√	√	√	√	√	√1	√2	√	√3	√	√
19	√	√	√	√	√	√	√1	√2	√	√3	√	√
52	√	√	√	√	√	√	√1	√2	√	√3	√	√
104	√	√	√	√	√	√	√1	√2	√	√3	√	√
108	√	√	√	√	√	√	√1	√2	√	√3	√	√
186	√	√	√	√	√	√	√1	√2	√	√3	√	√

1. The HACCP plan did not specify critical limits, monitoring procedures and monitoring frequencies performed for each CCP adequately.
2. The HACCP plan did not state adequately the procedures that the establishment will use to verify that the plan is being effectively implemented and the frequencies with which these procedures will be performed.

3. Corrective actions to be followed in response to a deviation from a critical limit not addressed adequately in the written HACCP plan.

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

Est. #	1. Flow diagram	2. Hazard analysis	3. All hazards identified	4. Use & users included	5. Plan for each hazard	6. CCPs for all hazards	7. Monitoring is specified	8. Corr. act's are described	9. Plan validated	10. Adequate verific. procedures	11. Adequate documentation	12. Dated and signed
11	√	√	√	√	√	√	√1	√2	√	√3	√	√
14	√	√	√	√	√	√	√1	√2	√	√3	√	√
18	√	√	√	√	√	√	√1	√2	√	√3	√	√
19	√	√	√	√	√	√	√1	√2	√	√3	√	√
22	√	√	√	√	√	√	√1	√2	√	√3	√	√
101	√	√	√	√	√	√	√1	√2	√	√3	√	√
118	√	√	√	√	√	√	√1	√2	√	√3	√	√
119	√	√	√	√	√	√	√1	√2	√	√3	√	√

1. The HACCP plan did not specify critical limits, monitoring procedures and monitoring frequencies performed for each CCP adequately.
2. The HACCP plan did not state adequately the procedures that the establishment will use to verify that the plan is being effectively implemented and the frequencies with which these procedures will be performed.
3. Corrective actions to be followed in response to a deviation from a critical limit not addressed adequately in the written HACCP plan.

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.

The results of these evaluations were as follows:

Est. #	1. Writ-ten pro-cedure	2. Samp-ler des-ignated	3. Samp-ling lo-cation given	4. Pre-domin. species sampled	5. Samp-ling at the req'd freq.	6. Pro-per site or method	7. Samp-ling is random	8. Using AOAC method	9. Chart or graph of results	10. Re-sults are kept at least 1 yr
3	√	√	√	√	√	√	√	√	√	√
5	√	√	√	√	√	√	√	√	√	√
9	√	√	√	√	√	√	√	√	√	√
19	√	√	√	√	√	√	√	√	√	√

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

The results of these evaluations were as follows:

Est. #	1. Writ-ten pro-cedure	2. Samp-ler des-ignated	3. Samp-ling lo-cation given	4. Pre-domin. species sampled	5. Samp-ling at the req'd freq.	6. Pro-per site or method	7. Samp-ling is random	8. Using AOAC method	9. Chart or graph of results	10. Re-sults are kept at least 1 yr
11	√	√	√	√	√	√	√	√	√	√
14	√	√	√	√	√	√	√	√	√	√
18	√	√	√	√	√	√	√	√	√	√

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. #	1. Testing as required	2. Carcasses are sampled	3. Ground product is sampled	4. Samples are taken randomly	5. Proper site and/or proper prod.	6. Violative est's stop operations
3	√	√	N/A	√	√	√
5	√	√	N/A	√	√	√
9	√	√	N/A	√	√	√
19	√	√	N/A	√	√	√
52	√	N/A	√1&2	√	√	√
104	√	N/A	√1	√	√	√
108	√	N/A	√1	√	√	√
186	√	N/A	√1	√	√	√

1. One *Salmonella* sample from ready to eat product from each shipment to be exported.
2. One *Salmonella* sample from raw ground product per week.
3. One *Salmonella* sample from raw ground product from each batch.

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

Est. #	1. Testing as required	2. Carcasses are sampled	3. Ground product is sampled	4. Samples are taken randomly	5. Proper site and/or proper prod.	6. Violative est's stop operations
11	√	√	N/A	√	√	√
14	√	√	N/A	√	√	√
18	√	√	N/A	√	√	√
22	√	N/A	√1&3	√	√	√
101	√	N/A	√1	√	√	√
118	√	N/A	√1	√	√	√
119	√	N/A	√1&2	√	√	√

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

REVIEW DATE

NAME OF FOREIGN LABORATORY

05/17/2000

Kimron Veterinary Institute
National Residue Control Laboratory

FOREIGN COUNTRY LABORATORY REVIEW

FOREIGN GOV'T AGENCY
Veterinary Services & Animal Health
Ministry of Agri. & Rural Development

CITY & COUNTRY
Beit Dagan, ISRAEL

ADDRESS OF LABORATORY
P/O BOX 50250

NAME OF REVIEWER
Faizur R. Choudry, DVM

NAME OF FOREIGN OFFICIAL
Stefan Soback, DVM. ph.D, Head, National Residue Control Laboratory

Residue Code/Name			100	300	400	500	200	203	800	S/V				
SAMPLING PROCEDURES	REVIEW ITEMS	ITEM #	EVALUATION CODE											
	Sample Handling	01	A	A	A	A	A	A	A	A				
	Sampling Frequency	02	A	A	A	A	A	A	A	A				
	Timely Analyses	03	A	A	A	A	A	A	A	A				
	Compositing Procedure	04	O	O	O	O	O	O	O	O				
	Interpret Comp Data	05	O	O	O	O	O	O	O	O				
	Data Reporting	06	A	A	A	A	A	A	A	A				
ANALYTICAL PROCEDURES	Acceptable Method	07	A	A	A	A	A	A	A	A				
	Correct Tissue(s)	08	A	A	A	A	A	A	A	A				
	Equipment Operation	09	C	C	C	C	C	C	A	A				
	Instrument Printouts	10	A	A	A	A	O	O	O	O				
QUALITY ASSURANCE PROCEDURES	Minimum Detection Levels	11	A	A	A	A	O	O	O	O				
	Recovery Frequency	12	A	A	A	A	O	O	O	O				
	Percent Recovery	13	A	A	A	A	O	O	O	O				
	Check Sample Frequency	14	A	A	A	A	A	A	A	A				
	All analyst w/Check Samples	15	C	C	C	C	C	C	C	C				
	Corrective Actions	16	C	A	A	A	A	A	A	A				
	International Check Samples	17	A	A	A	A	A	A	A	A				
REVIEW PROCEDURES	Corrected Prior Deficiencies	18	A	C	C	C	A	C	C	A				
OTHER REVIEW		19	EVAL. CODE											
		20	EVAL. CODE											

SIGNATURE OF REVIEWER

DATE

FOREIGN COUNTRY LABORATORY REVIEW <i>(Comment Sheet)</i>		REVIEW DATE 05/17/2000	NAME OF FOREIGN LABORATORY Kimron Veterinary Institute National Residue Control Laboratory
FOREIGN GOV'T AGENCY Veterinary Services & Animal Health Ministry of Agri. & Rural Development		CITY & COUNTRY Beit Dagan, ISRAEL	ADDRESS OF LABORATORY P/O BOX 50250
NAME OF REVIEWER Faizur R. Choudry, DVM		NAME OF FOREIGN OFFICIAL Stefan Soback, DVM. ph.D, Head, National Residue Control Laboratory	

RESIDUE CODES	ITEM NO.	COMMENTS
100,300, 400,500, 200,203, 800	9	The following information for chlorinated hydrocarbons (CHC), organophosphates (OP), hormones, trace elements (TE), antibiotics, chloramphenicol, and sulfonamides was not recorded in the official books for Laboratory Quality Assurance Program. <ol style="list-style-type: none"> Lot numbers, expiration dates, and where the standard solutions/reagents/media ingredients were purchased, were not recorded in the standards books. The record books were not signed and verified by the supervisors each time before the newly prepared solutions were used by the technicians or chemists. No record was maintained for the corrective actions taken when unacceptable check sample results were received.
100,300, 400,500, 200,203, 800	14	The check sample program was not adequately maintained: no intralaboratory check samples for chlorinated hydrocarbons and organophosphates were carried out in March or April 2000, and no check samples at all were being done for hormones, trace elements, chloramphenicol, sulfonamides, or antibiotics as required.
111	1 to 17	Polychlorinated biphenyls (PCB's) were not being analyzed as required.
300,400, 500,203, 800	18	Intralaboratory check samples program was not carried out for organophosphates, trace elements, hormones, chloramphenicol, and sulfonamides during the last audit. GOI inspection officials indicated that intralaboratory check samples program will be implemented immediately but no corrections have been made except partially organophosphates check samples were carried out for January, February and May 2000.



Questions for Auditing Laboratories

General

Name & location of lab: **Institute for Food Microbiology and Consumer Goods
Tirat Carmel 39100, ISRAEL 5/15/2000**

Private or gov't lab? **Private**

How & when was accreditation obtained? **By the Ministry of Health/ 5-17-1984**

How & how often is accreditation maintained? **Announced/sometime
unannounced visits and twice a
year.**

When and how is payment for analysis provided? **Monthly by the establishment**

Are results released before payment is received? **yes**

What are the qualifications of the analyst(s) performing the individual tasks within a
method? **Total 7 analysts; 3 M.Sc & 3 B.Sc Microbiology and 1 Engineer.**

What are the qualifications of the direct supervisor of the analyst(s)? **Dr. Irit Weiser,
General Manager; Phd, in Food Microbiology,**

Methodology for HACCP Salmonella samples (regulatory labs)

Does this lab analyze HACCP Salmonella samples? **yes**

How are HACCP Salmonella samples received & recorded? **Collected from each
establishments by the laboratory personal and recorded on laboratory log
book.**

Are HACCP Salmonella samples analyzed on the day of receipt? **Analyzed on the
same day.**

What method(s) is used for HACCP Salmonella samples? **USDA-FSIS-
microbiology laboratory guide book. 3rd Edition-Chapter 4, 1998.**

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

Are HACCP ground beef samples analyzed for Salmonella? **Yes
(two establishments programmed one sample a month)**

What is the size of the ground beef test portion? **1 kilos**

What buffer (and what volume) is used for: **Phosphate buffer: 25 grams meat
and 225 ml buffer**

Sponge samples for *Salmonella*?

Poultry rinsates for *Salmonella*? **400ml**

Salmonella ground beef sample homogenates? **Yes with stomach machine**

What is the formulation of the Buffered Peptone Water you use? **Peptone 10.0g; sodium chloride 5.0g; disodium phosphate 3.5g; monopotassium phosphate 1.5g and distilled water 1 liter**

What analytical controls are used for *Salmonella* analyses(i.e. control cultures, etc.)?
***Salmonella typharium* 80 cc (14028)**

Are they employed for each sample set? **yes**

How are HACCP *Salmonella* results expressed? **(i.e. +/-results)**

How are HACCP *Salmonella* results recorded:

Data sheets/work sheets? **Data sheets**

and/or Log books? **Log books**

How and to whom are HACCP *Salmonella* results reported? **In writing to GOI inspection officials**

Are "check" samples periodically used to test the proficiency of the lab and analysts for *Salmonella* testing?

1. For individual analysts or for the lab as a whole? **Individual analyst intralaboratory & interlaboratory by the proficiency testing group in England (FEPAS)**
2. What species/strains are used? ***Salmonella typharium***
3. How many samples are analyzed and how often? **Three times a year (between 3-4 samples at a time)**
4. Are both inoculated and uninoculated samples provided to analysts for the proficiency testing? **Inoculated**
5. How many colony-forming units (cfu) per gram are inoculated into the proficiency samples provided to analysts? **30 to 300 p/ml**

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

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

How are HACCP *E. coli* samples received & recorded? **Collected from the establishment and recorded on the log book.**

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

What method is used for HACCP generic *E. coli* samples? **USDA-FSIS Guideline *E.coli*.testing program Control Verification in poultry slaughter establishments July 1997 (3-tube MPN AOAC 17.2.02 & *E.coli* 17.2.02)**

Is it a quantitative method? **yes**

What buffer (and what volume) is used for: **Phosphate buffer 10 ml**

E. coli sponge samples?

Poultry rinsates for generic *E. coli*? **Poultry rinsates**

What analytical controls are used? ***E.coli*.**

Are they employed for each sample set? **yes**

How are HACCP *E. coli* results calculated and/or expressed? **MPN Tube Index**

How are *E. coli* results recorded:

Data sheets/work sheets? **Data sheets & log books**

Log books?

How and to whom are HACCP *E. coli* results reported? **In writing to Veterinarian in charge**

Are "check" samples periodically used to test the proficiency of the lab and analysts for generic *E. coli* testing? **Intalaboratory check samples 3 times a year (between 3-4 samples at a time)**

6. For individual analysts or for the lab as a whole? **Individual analysts**

7. What species/strains are used? ***E.coli* strains 80 cc**

8. How many samples are analyzed and how often? **Intalaboratory check samples 3 times a year (between 3-4 samples at a time)**

9. Are both inoculated and uninoculated samples provided to analysts for the proficiency testing? **Inoculated**

10. How many colony-forming units (cfu) per gram are inoculated into the proficiency samples provided to analysts? **(10)2 & 910)4**

NOTE: IF YOU HAVE ANY QUESTIONS REGARDING THIS, FEEL FREE TO CALL EITHER VICTOR COOK OR BONNIE ROSE AT 202-501-6022.

FOREIGN PLANT REVIEW FORM

REVIEW DATE
05/07/2000

ESTABLISHMENT NO. AND NAME
Est. 003
Maof Limited

CITY
Beer Tuvia
COUNTRY
ISRAEL

NAME OF REVIEWER
Dr. Faizur R. Choudry

NAME OF FOREIGN OFFICIAL
Dr. Eliezer Nili, Director & Dr. Michael Hirik

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

FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE	ESTABLISHMENT NO. AND NAME	CITY
	05/07/2000	Est. 003 Maof Limited	Beer Tuvia
			COUNTRY
			ISRAEL
NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL		EVALUATION
Dr. Faizur R. Choudry	Dr. Eliezer Nili, Director & Dr. Michael Hirik		<input type="checkbox"/> Acceptable <input checked="" type="checkbox"/> Acceptable/Re-review <input type="checkbox"/> Unacceptable

COMMENTS:

19. a. A product wrapping machine that was ready for use but not in use, in the packaging room, was observed with dried fat, meat and flaking paint. GOI officials took corrective actions immediately.
- b. Seams at the junctions of boning tables, stands, and numerous edible product container in the boning room, were not sealed completely.
21. A build-up of dust, debris and feathers was observed on the floor, and coverings on the walls and floor junctions were not sealed properly to prevent the entrance of rodents and other vermin. Establishment officials ordered corrective actions immediately and proposed preventive measures to GOI inspection officials.
27. Turkey carcasses were found with grease and rail dust in the boning room. Carcasses were not effectively trimmed for defects at the pre-boning trim station. Establishment officials took corrective actions immediately.
28. a. Turkey carcasses were contacting the work platform and employees' boots at the turkey transfer station in the cut-up room. Establishment officials took corrective actions immediately and proposed modification to prevent recurrence.
- b. Edible product was contacting contaminated racks through the perforated bottoms of plastic containers in the boning room and coolers. Establishment officials proposed preventive measures to GOI inspection officials.
43. Edible and inedible product containers were not identified in the boning and slaughter rooms. Establishment officials proposed corrective and preventive measures to GOI officials.

FOREIGN PLANT REVIEW FORM

REVIEW DATE

05/16/2000

ESTABLISHMENT NO. AND NAME

Est. 0005
Milouof

CITY

Astrat

COUNTRY

ISRAEL

NAME OF REVIEWER
Dr. Faizur R. Choudry

NAME OF FOREIGN OFFICIAL
Dr. Eliezer Nüli & Dr. Karol Vigvari

EVALUATION

Acceptable

Acceptable/
Re-review

Unacceptable

CODES (Give an appropriate code for each review item listed below)

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Establishments separation	06 A	Preoperational sanitation		34	Processing equipment	62
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(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control		44	Export product identification	72
Over-product ceilings	17 U	Returned and rework product		45	Inspector verification	73
Over-product equipment	18 M	3. RESIDUE CONTROL			Export certificates	74
Product contact equipment	19 M	Residue program compliance		46	Single standard	75
Other product areas (inside)	20 M	Sampling procedures		47	Inspection supervision	76
Dry storage areas	21 A	Residue reporting procedures		48	Control of security items	77
Antemortem facilities	22 A	Approval of chemicals, etc.		49	Shipment security	78
Welfare facilities	23 A	Storage and use of chemicals		50	Species verification	79
Outside premises	24 A	4. PROCESSED PRODUCT CONTROL			"Equal to" status	80
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim		51	Imports	81
Personal dress and habits	25 A	Boneless meat reinspection		52		
Personal hygiene practices	26 A	Ingredients identification		53		
Sanitary dressing procedures	27 A	Control of restricted ingredients		54		

FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE 05/16/2000	ESTABLISHMENT NO. AND NAME Est. 0005 Milouof	CITY Ashrat
			COUNTRY ISRAEL
NAME OF REVIEWER Dr. Faizur R. Choudry	NAME OF FOREIGN OFFICIAL Dr. Eliezer Nili & Dr. Karol Vigvari		EVALUATION <input type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/Re-review <input checked="" type="checkbox"/> Unacceptable

COMMENTS:

5. A sanitizer was not maintained at the required temperature in the chicken cut-up room. Establishment officials took corrective action immediately.
- 7, 8. a. Neither establishment personnel nor GOI inspection officials had adequate knowledge of or control over the use of insecticides and rodenticides by the contracted pesticide company "Lenglive Eitan Sanitation and Pesticide Control, Limited".
b. Gaps at the bottom and sides of door openings to the outside at the junction of walls and ceilings were not sealed properly in the shipping room and the entrance to employees' locker room to prevent the entrance of rodents and other vermin. Establishment officials proposed corrective and preventive measures to GOI officials.
17. Dripping condensate, from overhead refrigeration units, ducts, and ceilings that were not cleaned/sanitized daily, was falling onto exposed edible product, and packaged boxes of meat in the coolers, cut-up room, packaging room, shipping room, and slaughter room. Neither establishment personnel nor GOI inspection officials took corrective actions.
18. Overhead beams and supports between the freezer and shipping rooms, ceilings in the mechanical deboning room, and electrical cables in the cut-up and packaging rooms were observed with accumulations of dust, dirt, extraneous material, and flaking paint.
19. In the product packaging and mechanical deboning rooms, conveyor belts were found with grease and deep cuts, and were extensively deteriorated; racks used for un-packaged and packaged product were observed with dried fat, meat, and extraneous material.
20. a. All chutes for edible product between cut-up and packaging rooms did not have smooth surfaces and were cracked.
b. Packaging material was stored underneath steps and was not protected to prevent any fallout.
c. A buildup of dust and debris was observed at the entrance to the carton conveyor chutes in the dry storage room.
28. a. Water was leaking from an overhead pipe onto a chicken rack at the hock cutter station. Establishment officials corrected immediately.
b. A carton conveyor passing over exposed product areas in the cut-up and packaging rooms, was not protected to prevent any fallout onto the product underneath.
- 34, 35. The daily pre-operational and operational SSOPs records did not reflect the actual sanitary conditions observed in the establishment.
43. Edible and inedible product containers were not identified in the slaughter and cut-up room. Establishment officials ordered immediate correction.
80. Because of product gross contamination, failure of a single standard for daily pre-operational and operational SSOPs/equivalent programs and procedures, and inadequate control over pest control programs, the sanitation status of this establishment is not equivalent to that required in the U.S. program. All the above discrepancies were discussed with Dr. Eliezer Nili, Director, Control of Animal Products and Dr. Karol Vigvari, Area Supervisor, Northern District, and they agreed to remove Establishment 5 from the list of establishments eligible to export poultry and poultry products to the United States, effective May 16, 2000.

FOREIGN PLANT REVIEW FORM

REVIEW DATE

05/08/2000

ESTABLISHMENT NO. AND NAME

Est. 009
 Of Hagalil Limited

CITY
 Kiryat Shmona

COUNTRY
 ISRAEL

NAME OF REVIEWER
 Dr. Faizur R. Choudry

NAME OF FOREIGN OFFICIAL
 Dr. Eliezer Nili & Dr. Karol Vigvari

EVALUATION

Acceptable Acceptable/
 Re-review 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 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 A	Laboratory confirmation	57 O
Chlorination procedures	02 A	Product reconditioning	31 A	Label approvals	58 A
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 M	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 A	Container closure exam	66 O
Lighting	11 A	Antemortem inspec. procedures	38 A	Interim container handling	67 O
Operations work space	12 A	Antemortem dispositions	39 A	Post-processing handling	68 O
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 A	Condemned product control	43 U	5. COMPLIANCE/ECON. FRAUD CONTROL	
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control	44 A	Export product identification	72 A
Over-product ceilings	17 M	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 A	Single standard	75 A
Other product areas (inside)	20 A	Sampling procedures	47 A	Inspection supervision	76 A
Dry storage areas	21 M	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		
Personal hygiene practices	26 A	Ingredients identification	53 O		
Sanitary dressing procedures	27 A	Control of restricted ingredients	54 O		

FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE	ESTABLISHMENT NO. AND NAME	CITY
	05/08//2000	Est. 009 Of Hagalil Limited	Kiryat Shmona
			COUNTRY
			ISRAEL
NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL	EVALUATION	
Dr. Faizur R. Choudry	Dr. Eliezer Nili & Dr. Karol Vigvari	<input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable	

COMMENTS:

17. Dripping condensate from ceilings that were not cleaned/sanitized daily was falling onto product in the boning room. Establishment officials were prompt in taking corrective actions and proposed preventive measures to GOI inspection officials.

7/21. a. A buildup of dust and debris was observed on the floor and some packaging materials were stored on the floor in the dry storage room and gaps at the bottom of door were not protected to prevent the entrance of rodents and other vermin in the dry storage room.

b. There was no door to separate the slaughter room from the product receiving and water pump room to prevent the entrance of rodents and other vermin. (No evidence of rodents and other vermin was observed in the slaughter and boning rooms). Establishment officials proposed preventive measures to GOI inspection officials.

28. Cleaned edible product containers were passing through dirty plastic strip curtains from the container washing room to the boning room. Establishment officials corrected immediately.

43. Edible and inedible product containers were not identified in the slaughter and boning rooms.

FOREIGN PLANT REVIEW FORM

REVIEW DATE ESTABLISHMENT NO. AND NAME

05/15/2000

Est. 0019
Soglowek (Shlomi) Limited

CITY
Shlomi

COUNTRY
ISRAEL

NAME OF REVIEWER
Dr. Faizur R. Choudry

NAME OF FOREIGN OFFICIAL
Dr. Eliezer Nili & Dr. Karol Vigvari

EVALUATION
 Acceptable Acceptable/
Re-review 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 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 A	Laboratory confirmation	57 O
Chlorination procedures	02 A	Product reconditioning	31 A	Label approvals	58 A
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 O
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 M	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 A	Container closure exam	66 O
Lighting	11 A	Antemortem inspec. procedures	38 A	Interim container handling	67 O
Operations work space	12 A	Antemortem dispositions	39 A	Post-processing handling	68 O
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 A	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 M	Returned and rework product	45 N	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 A	Single standard	75 A
Other product areas (inside)	20 A	Sampling procedures	47 A	Inspection supervision	76 A
Dry storage areas	21 M	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		
Personal hygiene practices	26 A	Ingredients identification	53 O		
Sanitary dressing procedures	27 M	Control of restricted ingredients	54 O		

FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE	ESTABLISHMENT NO. AND NAME	CITY
	05/15/2000	Est. 0019 Soglowek (Shlomi) Limited	Shlomi
			COUNTRY
			ISRAEL
NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL		EVALUATION
Dr. Faizur R. Choudry	Dr. Eliezer Nili & Dr. Karol Vigvari		<input type="checkbox"/> Acceptable <input checked="" type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable

COMMENTS:

7. Gaps at the bottoms of door in the product slipping room, were not sealed properly to prevent the entrance of rodents and other vermin. Establishment officials ordered immediate correction.
17. Condensate from ceilings that were not cleaned/sanitized daily was dripping in the chicken cut-up room and cooler. No product was underneath at the time of the audit. Establishment officials proposed preventive measures to prevent recurrence to GOI inspection officials.
21. A buildup of dust and debris was observed at the entrance to the carton conveyor chutes in the dry storage area. Establishment officials ordered immediate correction.
27. Several turkey carcasses were found with grease contamination in the boning room. Establishment officials took corrective actions immediately.
28. a. Turkey carcasses were contacting a contaminated hose at the eviscerating line in the slaughter room.
b. A cleaning rod for the turkey thoracic cavity was contacting the contaminated trough during rinsing prior to reuse. Establishment officials corrected both deficiencies immediately.

FOREIGN PLANT REVIEW FORM

REVIEW DATE

05/14/2000

ESTABLISHMENT NO. AND NAME

Est. 0052
Hod Lavan Limited

CITY
Beit Herut

COUNTRY
ISRAEL

NAME OF REVIEWER
Dr. Faizur R. Choudry

NAME OF FOREIGN OFFICIAL
Dr. Eliezer Nikli & Dr. Karol Vigvari

EVALUATION
 Acceptable Acceptable/
Re-review 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 M	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 A	Laboratory confirmation	57 A
Chlorination procedures	02 A	Product reconditioning	31 A	Label approvals	58 A
Back siphonage prevention	03 A	Product transportation	32 A	Special label claims	59 A
Hand washing facilities	04 A	(d) ESTABLISHMENT SANITATION PROGRAM		Inspector monitoring	60 O
Sanitizers	05 A	Effective maintenance program	33 A	Processing schedules	61 A
Establishments separation	06 A	Preoperational sanitation	34 A	Processing equipment	62 A
Pest --no evidence	07 A	Operational sanitation	35 A	Processing records	63 A
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 A
Equipment approval	16 A	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 M	Returned and rework product	45 N	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 M	Sampling procedures	47 O	Inspection supervision	76 A
Dry storage areas	21 A	Residue reporting procedures	48 O	Control of security items	77 A
Antemortem facilities	22 (1)	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 ●	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 A		
Personal hygiene practices	26 A	Ingredients identification	53 A		
Sanitary dressing procedures	27 U	Control of restricted ingredients	54 A		

FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE 05/14/2000	ESTABLISHMENT NO. AND NAME Est. 0052 Hod Lavan Limited	CITY Beit Herut
			COUNTRY ISRAEL
NAME OF REVIEWER Dr. Faizur R. Choudry	NAME OF FOREIGN OFFICIAL Dr. Eliezer Nikli & Dr. Karol Vigvari		EVALUATION <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable

COMMENTS:

17. Dripping condensate from overhead refrigeration units and ceilings that were not cleaned/sanitized daily was falling onto packaged meat boxes and edible product containers covered with plastic in the defrosting and packaging rooms. Establishment officials ordered immediate correction and proposed preventive measures to prevent recurrence to GOI inspection officials.

20. Dripping water from a rusty ice machine frame that was not cleaned/sanitized daily was falling into the ice container. Establishment officials ordered immediate correction and proposed preventive measures to prevent recurrence to GOI inspection officials.

28. An establishment employee was not washing his hands before handling edible product after using dirty equipment to open a grinding machine. Establishment officials corrected immediately.

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE INTERNATIONAL PROGRAMS FOREIGN PLANT REVIEW FORM	REVIEW DATE 05/15/2000	ESTABLISHMENT NO. AND NAME Est. 104 Yehiam Meat Products	CITY Kibbutz Yehiam
			COUNTRY ISRAEL

NAME OF REVIEWER Dr. Faizur R. Choudry	NAME OF FOREIGN OFFICIAL Dr. Eliezer Nili & Dr. Karol Vigvari	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 A
(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing	29 A	Packaging materials	56 A
Water potability records	01 A	Product handling and storage	30 A	Laboratory confirmation	57 A
Chlorination procedures	02 A	Product reconditioning	31 A	Label approvals	58 A
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 A
Establishments separation	06 A	Preoperational sanitation	34 A	Processing equipment	62 A
Pest --no evidence	07 A	Operational sanitation	35 A	Processing records	63 A
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 A
Equipment approval	16 A	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 M	Returned and rework product	45 N	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 (<i>inside</i>)	20 M	Sampling procedures	47 O	Inspection supervision	76 A
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 O	Imports	81 A
Personal dress and habits	25 A	Boneless meat reinspection	52 O		
Personal hygiene practices	26 A	Ingredients identification	53 A		
Sanitary dressing procedures	27 O	Control of restricted ingredients	54 A		

FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE	ESTABLISHMENT NO. AND NAME	CITY
	05/15/2000	Est. 104 Yehiam Meat Products	Kibbutz Yehiam
			COUNTRY
			ISRAEL
NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL	EVALUATION	
Dr. Faizur R. Choudry	Dr. Eliezer Nili & Dr. Karol Vigvari	<input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/Re-review <input type="checkbox"/> Unacceptable	

COMMENTS:

17. Dripping condensate from overhead refrigeration units, and ceilings that were not cleaned/sanitized daily in two coolers, was falling onto packaged meat product. Establishment officials ordered immediate correction and proposed corrective measures to prevent recurrence to GOI inspection officials.

20. Processed product packaging machines were too close to an open drain with running water, with a potential for splash contamination from drain water. Establishment officials proposed preventive measures to GOI inspection officials.

FOREIGN PLANT REVIEW FORM

REVIEW DATE

05/09/2000

ESTABLISHMENT NO. AND NAME

Est. 0108
Of Tov - Meat Industry

CITY
Beit Shean

COUNTRY
ISRAEL

NAME OF REVIEWER
Dr. Faizur R. Choudry

NAME OF FOREIGN OFFICIAL
Dr. Eliezer Nili & Dr. Karol Vigvari

EVALUATION

Acceptable Acceptable/
Re-review 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 A	Laboratory confirmation	57 A
Chlorination procedures	02 A	Product reconditioning		31 A	Label approvals	58 A
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 A
Establishments separation	06 A	Preoperational sanitation		34 A	Processing equipment	62 A
Pest --no evidence	07 A	Operational sanitation		35 A	Processing records	63 A
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 A
Equipment approval	16 A	Condemned product control		43 U	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 N	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
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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		60 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 O	Imports	81 A
Personal dress and habits	25 A	Boneless meat reinspection		52 A		
Personal hygiene practices	26 A	Ingredients identification		53 A		
Sanitary dressing procedures	27 O	Control of restricted ingredients		54 A		

FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE 05/09/2000	ESTABLISHMENT NO. AND NAME Est. 0108 Of Tov - Meat Industry	CITY Beit Shean
			COUNTRY ISRAEL
NAME OF REVIEWER Dr. Faizur R. Choudry	NAME OF FOREIGN OFFICIAL Dr. Eliczer Nili & Dr. Karol Vigvari		EVALUATION <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable

COMMENTS:

43. Edible and inedible product containers were not identified in the processing room. Establishment officials ordered immediate correction and proposed preventive measures to GOI inspection officials.

FOREIGN PLANT REVIEW FORM

REVIEW DATE
05/11/2000

ESTABLISHMENT NO. AND NAME
Est. 186
Sea-Chef

CITY
Kibbutz
COUNTRY
ISRAEL

NAME OF REVIEWER
Dr. Faizur R. Cboudry

NAME OF FOREIGN OFFICIAL
Dr. Eliezer Nili & Dr. Karol Vigvari

EVALUATION
 Acceptable Acceptable/
Re-review 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 A	Laboratory confirmation	57 A
Chlorination procedures	02 A	Product reconditioning	31 A	Label approvals	58 A
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 A
Establishments separation	06 A	Preoperational sanitation	34 A	Processing equipment	62 A
Pest --no evidence	07 A	Operational sanitation	35 A	Processing records	63 A
Pest control program	08 A	Waste disposal	36 A	Empty can inspection	64 O
Pest control monitoring	09 A	2. DISEASE CONTROL		Filing 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 A
Equipment approval	16 A	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 N	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 A
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 O	Imports	81 A
Personal dress and habits	25 A	Boneless meat reinspection	52 A		
Personal hygiene practices	26 A	Ingredients identification	53 A		
Sanitary dressing procedures	27 O	Control of restricted ingredients	54 A		

FOREIGN PLANT REVIEW FORM (reverse)	05/11/2000	Est. 186 Sea-Chef	CITY Kibbutz
			COUNTRY ISRAEL
NAME OF REVIEWER Dr. Faizur R. Choudry	NAME OF FOREIGN OFFICIAL Dr. Eliezer Nili & Dr. Karol Vigvari		EVALUATION <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable

COMMENTS:

STATE OF ISRAEL

Ministry of Agriculture and Rural Development,
Veterinary Services and Animal Health, P.O.B 12, Beit-Dagan, 50250.

December 20, 2000

Mr. Mark Manis
International Policy Division, Office of Policy
Program Development and Evaluation
F.S.I.S., USDA
Room 341-E, Jamie L. Whitten Federal Building
Washington D.C. 20250
U.S.A.

Re.: FSIS audit report on the veterinary supervision system in plants approved for export: FSIS Auditor's Report of October 12, 2000.

Dear Mr. Manis,

Following please find the comments of the Israel Veterinary Services on the subject report.

Verification of the HACCP system in the plants

- 1) In the month of September the Israel Veterinary Services required all supervisory veterinarians in plants approved for export to participate in a workshop which was wholly devoted to processes for verification of HACCP systems.

In the course of the workshop the following topics were learned:

- a. The importance of the HACCP system in the reduction and prevention of health hazards in food.
 - b. Hazard identification in the production process.
 - c. The identification and characterization of critical control points in the production process.
 - d. Ways to determine the critical limits of the critical control points.
 - e. Determination of the inspection methods at the critical control points.
 - f. Documentation of the HACCP system
 - g. Determination of methods and procedures for verification of the effectiveness of the HACCP system.
 - h. Periodic "validation and evaluation" processes of the HACCP system.
- 2) During the month of August, each veterinarian received a procedure sheet which listed the stages of the HACCP verification procedure to be employed by the supervisory veterinarian. The procedures list is attached as Annex A. updated verification procedures according to FSIS requirements were introduced in October 2000.
- 3) **Fecal Contamination (zero tolerance)**
Following receipt of the audit results, the HACCP programs in the certified plants were changed and new verification procedures were introduced to the production line as required by the auditor.

STATE OF ISRAEL

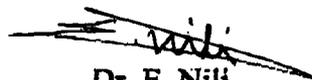
Ministry of Agriculture and Rural Development,
Veterinary Services and Animal Health, P.O.B 12, Beit-Dagan, 50250.

- 4) Examination of critical control point records prior to marketing of processed product
In conjunction with the auditor, it was determined that the pre-marketing review, follow-up, and supervision at critical control points would be performed first solely on products intended for the U.S. market. Accordingly, new procedures were introduced. The forms and records are now reviewed as required.
- 5) Intralaboratory check samples program
Attached please find the response to the auditor's comments, prepared by Dr. S. Sobak, head of the National Residue Control Laboratory.

Finally, I would like to take this opportunity to thank your auditor for his professional comments, which helped us to improve our supervision of the hygiene of poultry products in Israel. As in the past, the Israel Veterinary Services will continue to implement all necessary measures to safeguard the health and hygiene of meat products, and maintain Israel's position as an exporter of poultry products to the United States.

With sincere best wishes for the holiday season.

Sincerely yours,



Dr. E. Nili
Director
Control of Animal Products

Cc: Dr. O. Nir, (Markusfeld).BVSc, MRCVS
Director, Veterinary Services and Animal Health,
Agricultural Attache, U.S. Embassy, Tel-Aviv

Dr. T. Friedgut,
Office of Agricultural Affairs,
American Embassy, Tel-Aviv

STATE OF ISRAEL

Ministry of Agriculture and Rural Development,
Veterinary Services and Animal Health, P.O.B 12, Beit-Dagan, 50250.

ANNEX A

Procedure Sheet	3-2000	01/08/2000
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Verification of the HACCP System in Animal Food Production Plants Authorized for Export

1. Background

In order to reduce the health hazards involved in the manufacture and/or processing of animal food products and the consequent potential harm to consumer health, health services in the western world have defined the requirements for establishing an HACCP (Hazard Analysis and Critical Control Points) system for every approved plant. The plan is based on an analysis of the hazards and critical control points in the manufacturing process.

The HACCP approach is an efficient and systematic control system for the manufacturing process that will enable identification of anticipated hazards to consumer health. This approach also enables the evaluation of hazards and implementation of the actions required for preventing product contamination by biological, chemical or physical factors.

The health authorities supervising the hygiene level of food products in the USA and EU have stipulated in their legislation the obligation of establishing the HACCP system in local plants that process animal food-products. At the same time, a target date was set for the overseas implementation of the system in plants requesting to export products into their domains. Israel, as an approved animal products exporting country, was required to report regarding the operation of HACCP systems in all its authorized export plants no later than January 25, 1999.

A project manager, whose task is to provide training and inspection of animal product export plants, has been working for the Department for Inspection of Animal Products since February 1998.

The first stage consisted of establishing a system infrastructure, based on the collected HACCP principles and their transformation into applicable requirements, followed by adopting these principles by the plants. The plant management was given the responsibility of structuring the HACCP plans. The plans were presented to and checked by the project manager in collaboration with experts in the Department for Inspection of Animal Products. Plans that complied with the requirements were approved, and the plants were requested to operate accordingly.

Once the approved plan is in operation, the project manager undertakes a certifying examination, aimed at validating the HACCP system in the plant. Validation is subject to the system's compliance with the defined requirements, its effectiveness, and its compliance with the plan targets and the requirements of the legislative authorities. This audit, in addition to examining the implementation of the HACCP, also checks all factors influencing product/process quality, such as environmental factors, pesticide systems, calibration of measuring devices, structural maintenance, internal audits, etc.

A summarizing report is produced on completion of the audit. The report details the faults found during the audit, according to severity (classified as slight/significant incompatibilities). The report is submitted to plant management which is responsible for rectifying incompatibilities identified during the audit. The plant management must also submit incompatibility reports detailing the corrective actions taken in accordance with a time schedule predetermined by the project manager.

The audit report is transferred simultaneously to the certification committee, the members of which include the director of the Department for Inspection of Animal Products, the chairman

of the certification committee, the head veterinarian for exports and imports, the North/South regional veterinarian, and the HACCP project manager. The committee meets to discuss the results of the audit, and has the authority to validate the HACCP system in the plant. The committee is also authorized to delay or prevent the validation of a plan and to demand clarifications/additional activities aimed at determining the quality of the plan prior to final authorization.

Follow-up audits are performed in every authorized plant twice a year following validation of the HACCP system. The aim of the audit is to ensure that the plants implement and maintain the HACCP system and operate according to the requirements.

The veterinary inspection must include routine supervision and ensure proper implementation of the HACCP system. Such supervision will be performed and aided by ongoing verification activities.

Ongoing Verification Activities

The aim of these activities is to verify the proper and effective implementation of the HACCP system (as defined/anticipated by us).

The verification activities include the following subjects:

- Calibration of the measuring instruments used for monitoring (at least once a week).
- Direct observation of the monitoring activities and corrective actions.
- Daily review of forms (including the signature of the person in charge).

The verification activities may include samples of products for microbiological and other tests.

The quality assurance system in the plant is responsible for verifying the monitoring activities, corrective action and documentation and for performing the actual verification.

The inspecting veterinarian is responsible for verifying (independent of the control system) the monitoring activities, corrective action, documentation and verification activities performed by the quality assurance system at the plant.

2. Method

The inspecting veterinarian must verify the implementation of the HACCP system in the plant on a daily basis. The nature of the verification activity and the critical control point on which the verification is performed are subject to the veterinarian's discretion. However, he/she must make sure that these tests are planned in such a way as to ensure that all the plan indices are reviewed every week/month!!

The results of the verification are to be documented in a weekly verification follow-up form (see Appendix A), which is retained in the inspecting veterinarian's office for two years, for follow-up and auditing purposes.

If the inspecting veterinarian identifies discrepancies between that defined in the HACCP plan and that implemented in reality, he/she must inform the quality assurance manager and/or plant manager of the irregularity.

If the irregularity repeats itself constantly, and/or is severe, and in the inspecting veterinarian's opinion, endangers public health, the inspecting veterinarian will immediately notify the plant management of the matter and will oblige it to urgently inform him/her of the corrective actions that it intends to take to correct the irregularity. The inspecting veterinarian's report will be transferred to the plant's management in writing, in accordance

with the format detailed in Appendix B. The plant management response to this application will also be furnished in writing, according to the format detailed in Appendix C, and no later than 24 hours from receipt of the inspecting veterinarian's report regarding the irregularity.

3. Date of Validity

The directives contained in this procedure sheet will come into effect as of October 1, 2000.


Dr. A. Nili

Director
Control of Animal Products

Distribution:

Inspecting veterinarians at slaughter houses and plants authorized to export.
North-south district veterinarians
HACCP project manager

APPENDIX A

Weekly Follow-Up Form for Verification of the HACCP System by the Inspecting Veterinarian

For the week beginning: _____

Date	Verification Activity	Documentation (referral to record in control form)	Comments

Signature of Inspecting Veterinarian: _____

APPENDIX B

Date: _____

To
Mr. _____
Manager, _____ plant

Dear Mr. _____

Re: Significant Discrepancy in Implementation of the HACCP System

As you know, your plant operates an HACCP system which undergoes a continual process of verification. On _____, I found a significant discrepancy in implementation of the system. Below is a description of the discrepancy:

You are requested to instruct your representative to urgently examine the causes of this discrepancy and to take the measures required to bring the HACCP system under control no later than _____ (day) _____ (hour).

Please inform me of the actions you have ordered taken to rectify this matter.

Inspecting Veterinarian
Dr. _____

Copy:
HACCP Project Manager
Regional Veterinarian
Quality Assurance Manager

APPENDIX C

Date: _____

To
Dr. _____
Inspecting veterinarian at the _____ plant

Dear Dr. _____

Re: Significant Discrepancy in Implementation of the HACCP System
Your letter dated: _____

Below, please find details of the corrective actions taken following your letter:

As a result of these actions, the HACCP system is once again functional.

Mr. _____
Plant Manager

Copy:
HACCP Project Manager
Regional Veterinarian
Quality Assurance Manager

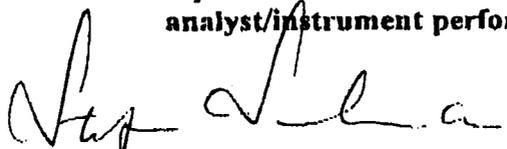
STATE OF ISRAEL

Ministry of Agriculture and Rural Development,
Veterinary Services and Animal Health
Kimron Veterinary Institute, P.O.B 12, Beit-Dagan, 50250.

Dr. Eliezer Nili
Head, Animal Product Control
Ministry of Agriculture/Veterinary Services
Beit Dagan 50250
Israel

Re: Audition report by the USDA concerning the National Residue Control Laboratory, Israel

- 1. Intralaboratory check sample program was revised to comply with the requirements of the USDA/FSIS.**
- 2. Polychlorinated biphenyls (PCB's) were not included in the monitoring program year 2000 (as indicated in the answer of Dr. Nili citing Mr. Mark Manis, Director, International Policy Division/FSIS). Therefore, check samples concerning this group of compounds were not performed.**
- 3. Information in the Laboratory Quality Assurance record books:**
 - a. In the process of revision of the Quality Assurance systems in the National Residue Control Laboratory, the Laboratory now keeps records of all relevant information concerning standard solution/reagents/media.**
 - b. The National Residue Control Laboratory is presently in process to gain ISO 17025 accreditation. In line with this process the Laboratory have appointed a supervisor and a Quality Assurance officer. These changes are also reflected in laboratory procedures such as control of the preparation of standard solutions.**
 - c. Corrective action reports have now been integrated to the Quality system of the Laboratory and, consequently, such report is now filed for every unacceptable analyst/instrument performance.**



Stefan Soback, DVM, PhD

Head, National Residue Control Laboratory