



United States  
Department of  
Agriculture

Food Safety  
and Inspection  
Service

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20250

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Dr. Frits H. Pluimers  
Chief Veterinary Officer  
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Room 4205  
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2500 EK The Hague  
The Netherlands

Dear Dr. Pluimers:

The Food Safety and Inspection Service (FSIS) conducted an on-site audit of the Netherlands' meat inspection system from October 1 through 24, 2001. Enclosed is a copy of the final audit report. Comments by the Netherlands on the draft final audit report have been included as an attachment to the enclosed final audit report.

FSIS was very pleased with your comments of March 14, 2002. FSIS will make every effort to address the general comments noted on the first page, especially those concerning the presentation and format of the audit report and the uniformity and standardization of the audit process and the auditors. FSIS was also grateful that you have made the noted adjustments to the Dutch meat inspection system in response to the aforementioned audit and taken the indicated corrective and preventive actions.

If you have any questions regarding the audit or need additional information, please contact me by telephone at (202) 720-3781, by fax at (202) 690-4040, or by e-mail at [sally.stratmoen@fsis.usda.gov](mailto:sally.stratmoen@fsis.usda.gov). You may also contact Richard F. Brown by telephone at (202) 690-2679, by fax at (202) 690-4719, or by e-mail at [richard.brown@fsis.usda.gov](mailto:richard.brown@fsis.usda.gov).

Sincerely,

*S* Sally Stratmoen  
Chief, Equivalence Section  
International Policy Staff  
Office of Policy, Program Development  
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Enclosure

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Mary Revelt, Minister/Counselor for Agricultural Affairs, USEU/Brussels  
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Country File (FY 2001 1<sup>st</sup> Audit - Netherlands)

FSIS:OPPDE:IPS:ES:Rbrown:bw:4/18/20:690-2679:Netherlands FY01 1<sup>st</sup> audit



## AUDIT REPORT FOR NETHERLANDS

October 1 through October 24, 2001

### INTRODUCTION

#### Background

This report reflects information that was obtained during an audit of the Netherlands meat inspection system from October 1 through October 24, 2001. Eight of the 24 establishments certified to export meat to the United States were audited. Four of these were slaughter establishments; the other four were conducting processing operations.

The last audit of the Dutch meat inspection system was conducted in February 2000. Eight establishments were audited: all were acceptable. During this new audit, three of these establishments were included in the new itinerary.

The major concerns from the previous audit were the following.

- No continuous coverage of inspection in processed product and warehouse/freezer facilities.
- Monthly supervisory visits were not performed. Only four internal reviews were conducted per year by district officials.
- No inspection coverage provided for second and third shift operations.
- There is no official oversight of private laboratories.
- No arsenic monitoring.
- *Salmonella* species testing started in May 1999. Following 1<sup>st</sup> and 2<sup>nd</sup> set-samples results failing the performance standards, further testing was put on hold until March 2000.
- RVV (National Inspection Service for Livestock and Meat) does not have a microbiological monitoring program for finished products, which includes 'scheduled' or 'directed' testing (*Salmonella* and *Listeria*) for ready-to-eat product.
- Dead on arrival (DOA) carcasses and condemned/inedible product was not denatured or de-characterized.
- Verification sampling for species identification is not done by RVV. The Netherlands is not exempt from official species verification.
- Post-mortem inspection procedures for large calves was incomplete.

The Netherlands exports only processed pork products to the United States. Product must be cooked (to at least 69° C), cured and dried (at least 90 days), or canned (shelf stable-sealed, then cooked). Fresh pork may not be imported due to APHIS restrictions, although OIE has declared Netherlands free of swine fever. Product prepared from beef of Netherlands origin is not eligible for export to U.S. due to bovine spongiform encephalopathy (BSE).

As of end of August 2001, Dutch establishments exported 8,516,693 pounds of cured pork, canned picnics, luncheon meat, or chopped ham, and pork sausage to the U.S. There were no port-of-entry rejections.

## PROTOCOL

This on-site audit was conducted in four parts. One part involved visits with Dutch national meat inspection officials to discuss oversight programs and practices, including enforcement activities. The second entailed an audit of a selection of records in the meat inspection headquarters facilities preceding the on-site visits. Establishments 60, 64, 82, 101, 160, 236, and 312 were selected randomly for records audits. The third part involved on-site visits to eight establishments: four slaughter establishments (27, 193, 369, and 378) and four processing establishments (55, 129, 153, and 242) were selected randomly. 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*.

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

During all on-site establishment visits, the auditor evaluated the nature, extent, and degree to which findings impacted on food safety and public health, as well as overall program delivery. The auditor also determined if establishment and inspection system controls were in place. Establishments that do not have effective controls in place to prevent, detect and eliminate product contamination/adulteration are considered unacceptable and therefore ineligible to export products to the U.S., and are delisted accordingly by the country's meat inspection officials (this was the case with one establishment – Est. 27).

## RESULTS AND DISCUSSION

### Summary

Effective inspection system controls were found to be in place in only six of the eight establishments audited: all of these six establishments (129, 193, 242, 378, 153, and 55) were recommended for re-review. Two establishments (27 and 369) were 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, numerous major concerns had been identified during the last audit of the Dutch meat inspection system that was conducted in February 2000.

During this new audit, the auditor determined that some of these major concerns had been addressed and corrected by the National Inspection Service for Livestock and Meat (RVV). However, the following deficiencies identified in the February 2000 audit had not been addressed and corrected.

- No adequate daily inspection coverage to processed product establishments and warehouse/freezer facilities. *This was a repeat deficiency.*
- Monthly supervisory visits were not performed. Only two internal reviews were conducted per year by the district or regional auditors. *This was a repeat deficiency.*
- No daily inspection coverage provided for second and third shift operations. *This was a repeat deficiency.*
- Post-mortem inspection procedures for large calves were incomplete. *This was a repeat deficiency.*
- RVV does not have a microbiological monitoring program for finished products, which includes 'scheduled' or 'directed' testing (*Salmonella* and *Listeria*) for ready-to-eat product. *This was a repeat deficiency.*

During this new audit the following deficiencies were noted.

- Implementation of the required HACCP programs was now found to be deficient in all fifteen establishments visited on-site and records audits. Details are provided in the Slaughter/ Processing Controls section later in this report.
- In fourteen establishments, the implementation and maintenance of SSOP was inadequate.
- In seven establishments, there were instances of actual product contamination and instances of the potential for direct product contamination.
- In four establishments, there were inadequate inspection system controls, including the identification of containers for edible and inedible product, enforcement of the zero-tolerance for visible fecal material/ingesta contamination, and milk on carcasses, lack of postmortem inspection procedures to check for disease, and carcass and offal inspection requirements.
- In all of the establishments, there was a lack of periodic supervisory reviews of certified establishments.
- In all establishments producing processed products, GON meat inspection officials were not providing adequate daily inspection coverage. Inspectors were visiting establishments at variable frequencies such as once a week, once a month, four times a year, daily, and between one to four hours each visit.
- In all establishments producing processed products, Government of Netherlands (GON) meat inspection officials were not providing daily inspection coverage for second and third shift operations.
- In all establishments, the final review of all documentation associated with the production of the product prior to shipping was not done.
- In both laboratories (RIKILT and RVV), the quality assurance program, such as check sample programs, was not adequately maintained, there was no documentation for any corrective actions taken when percent recovery results fell below the established

acceptable range limit, and the standards book was not maintained for the quality assurance program.

- Samples for chlorinated hydrocarbons, polychlorinated biphenyls, organophosphates, trace elements, hormones, and nitrogen pesticides were not analyzed in a timely manner. Samples were analyzed and completed between 6 to 12 weeks. It is extremely critical for OP, DES, Sulfonamides, A.B. testing.
- In six establishments, the carcass selection was not made randomly and the random method was not specified in the procedure for the testing of generic *E. coli*.
- In seven establishments, inspectors were not taking samples randomly for *Salmonella* testing.
- RVV does not have a microbiological monitoring program for finished products, which includes 'schedule' or 'directed' testing (*Salmonella* and *Listeria*) for ready-to-eat product.

### Entrance Meeting

On October 1, an entrance meeting with Netherlands government officials was held at the Voorburg offices of the National Inspection Service for Livestock and Meat (RVV). The Dutch government participants were Dr. Tom Akkerman, Deputy Chief Veterinary officer, Ministry of Agriculture, Nature Management and Fisheries (VVM); Dr. Jan-Willem Zijlker, Policy Advisor (VVM); Dr. Jan van den Berg, Deputy Director, National Inspection Service for Livestock and Meat (RVV); Dr. Luuk van Duijn, Head of the Inspection Department (RVV); Dr. Ate Jelsma, Coordinator Inspections (RVV); Dr. Ron Dwinger, Policy Advisor (RVV); Dr. Henk Keukens, Head of RVV Laboratories (RVV); Dr. Willem Droppers, Policy Advisor, Ministry of Health; Mr. Gerke Corstiaensen, Meat Industry Representative, and Mr. J. Klessens, Meat Industry Representative, Central Organization for the Meat Industry (COV).

The United States government participants were Mr. Philip Letarte, Agricultural Counselor, American Embassy, The Hague, and Dr. Faizur R. Choudry, International Audit Staff Officer, Food Safety and Inspection Service (FSIS).

Topics of discussion included the following:

- Welcome by Dr. Tom Akkerman, Deputy Chief Veterinary officer, and explanation of the Dutch meat inspection system.
- Overview of the National Residue Program.
- Discussion of the previous audit report.
- Training programs for veterinary meat inspection officials for pathogen reduction and other food safety initiatives such as SSOPs, HACCP programs, generic *E. coli* testing and *Salmonella* testing
- The audit itinerary and travel arrangements.
- The auditor provided a copy of the current Quarterly Regulatory and Enforcement Report.

## Headquarters Audit

There had been no changes in the organizational structure or upper levels of inspection staffing since the last U.S. audit of Netherlands inspection system in February 2000.

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, Nature Management and Fisheries, National Inspection Service for Livestock and Meat (RVV) office. 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
- 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 products from livestock with conditions such as tuberculosis, cysticercosis, etc., and of inedible and condemned materials.
- Export product inspection and control including export certificates.
- Enforcement records including examples of criminal prosecution, consumer complaints, recalls, seizure and control of 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.

## HACCP Programs

- In three establishments, the HACCP plan did not adequately conduct a hazard analysis that included food safety hazards likely to occur.
- In six establishments, the HACCP plan did not adequately specify critical limits for each CCP, and the monitoring frequency with which these procedures would be performed.
- In six establishments, the HACCP plan did not address adequately the corrective actions to be followed in response to deviations from critical limits.
- In one establishment, the HACCP plan was not validated to determine that it was functioning as intended.

- In seven establishments, the HACCP plans did not adequately state the procedures that the establishment would use to verify that the plan was being effectively implemented and the frequencies with which these procedures would be performed. The on-going verification activities of the HACCP programs were not adequately performed by establishment personnel.
- In five establishments, the HACCP plan's record-keeping system was not adequately documenting the monitoring of CCPs and/or was not including records with actual values and observations.
- In seven establishments, the final review of all documentation associated with the production of the product prior to shipping was not done.
- In seven establishments, the verification activities of the HACCP plan were not adequately performed by the GON meat inspection officials.

#### Sanitation Standard Operating Procedure (SSOP)

- In one establishment, the written SSOP did not address operational sanitation.
- In five establishments, the daily monitoring records of pre-operational and operational sanitation and any corrective actions taken were not being adequately maintained.
- GON meat inspection officials were only monitoring/verifying the adequacy and effectiveness of pre-operational sanitation at variable frequencies such as daily, twice a week and monthly, and records of these activities were not adequately maintained.

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

- In three establishments, the carcass selection was not made randomly and the random method was not specified in the procedure.

#### Inspection System Controls

- GON meat inspection officials were not providing adequate daily inspection coverage to processing establishments. Inspectors were visiting establishments once a month and for only two or three hours per visit in two establishments.
- In seven establishments, the monthly supervisory visits were not performed. Only two internal reviews were conducted per year by the district or regional auditors.
- In four establishments, the carcass selection for *Salmonella* testing was not made randomly by the GON meat inspection officials.

#### Government Oversight

All inspection veterinarians and inspectors in establishments certified by the Netherlands as eligible to export meat products to the United States were full-time or some part-time National Inspection Service for Livestock and Meat (RVV) employees of the Ministry of Agriculture, Nature Management and Fisheries, receiving no remuneration from either industry or establishment personnel.

The most relevant responsibilities of the central government are to participate and negotiate during new or revised EC legislation, to interpret and clarify EC Directives and federal laws and regulations, to ensure implementation, and to pass these documents on to the five regional departments. These are then passed on to the districts and to the team leader by the district offices. These regional departments are split into seventeen districts (each region between 3 to 4 districts) and these districts are split into forty-nine teams (each district between 3 to 4 teams). Each team has a team leader and the team consists of between twenty-five and forty employees which includes veterinarians and non-veterinarians inspectors. Each team is responsible for carrying out inspection and control tasks in their assigned slaughter and processed products establishments. Several auditors are assigned in the districts and in some regions and they are responsible for carrying out two audits at every establishment yearly.

All inspection compliance is mandated by the central government and carried out by the regional and district offices. The audit report is kept in the archives of the official veterinarian, district and regional offices. The management of the establishment receives a copy of the report. The follow-up audit was carried out by a team of auditors.

However, in relation to daily supervision, corrective actions were not adequately followed-up. Although in most establishments, serious pre-operational and operational sanitation deficiencies were revealed.

The supervision and authority is established or delegated by the central government. The region, district, team leader and official veterinarian in the establishments that work within these levels of authority are accountable to the central government. Disciplining or firing resident veterinarians or inspectors is recommended by the team leader to district office to region and to the central government.

Although there are detailed instructions of what to do when visiting a “lower” level authority, including visits to an establishment, the central governments rely heavily upon the results of region, district audits of their inspection system.

In addition, part of the responsibility of the region and district is to approve establishments for EC and U.S. markets and to withdraw federal approval from these establishments. The district office notifies the regional office and to the central government office in The Hague of each approval and withdrawal. The central government office normally does not visit these establishments as a result of the approval and does not supervise or question the validity of a region’s, district’s decision to approve or withdraw an establishment. However, the districts work closely with the team leader and auditor to secure compliance for the approvals and have extensive documentation of their pre-approval inspections of the establishments.

### Establishment Audits

Twenty-four establishments were certified to export meat products to the United States at the time this audit was conducted. Eight establishments (27, 129, 193, 369, 242, 378, 153,

and 55) were visited for on-site audits. In six of the eight establishments visited, both Netherlands inspection system controls and establishment system controls were in place to prevent, detect and control contamination and adulteration of products, however these six establishments (129, 193, 242, 378, 153, and 55) were rated acceptable re-review because of deficiencies regarding sanitation, condition of facilities, and non-compliance with HACCP requirements.

Two establishments (27 and 369) were found to be unacceptable because of critical sanitation problems and findings of direct product contamination.

### Laboratory Audits

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

The State Institute for Quality Control of Agricultural Products Laboratory (RIKILT) in Wageningen was audited on October 17, 2001. Except as noted below, effective controls were in place for sample handling and frequency, data reporting, tissue matrices for analysis, equipment operation and printouts, minimum detection levels, and recovery frequency. The methods used for the analyses were acceptable. No compositing of samples was done.

The following deficiencies were noted:

- The check samples program did not meet FSIS requirements. In most sections of the laboratory, regular spiked samples that were routinely run as part of a sample set were erroneously considered to be check samples. No check samples were performed for chlorinated hydrocarbons, polychlorinated biphenyls, organophosphates, trace elements, and nitrogen pesticides
- Samples for chlorinated hydrocarbons, polychlorinated biphenyls, organophosphates, trace elements, hormones, and nitrogen pesticides were not analyzed in a timely manner such as samples were analyzed and completed between 6 to 12 weeks.
- Standards book for organophosphates, trace elements, and nitrogen pesticides was not maintained for quality assurance program.
- When percent recovery results were fallen below the established acceptable range limit and any corrective actions taken were not documented for quality assurance program such as hexachlorobenzene, methomyl, and propoxur.

Netherlands microbiological testing for *Salmonella* was being performed in government laboratories. One of these, the Laboratory of the Inspection Service for Livestock and Meat (LRVV) in Wageningen, was audited on October 19, 2001.

The following deficiencies were noted:

- The standards book for hormones was not maintained for the quality assurance program.
- When percent recovery results fell below the established acceptable range limit and any corrective actions taken were not documented for quality assurance program such as sulfadimethoxine and hormones.

#### Establishment Operations by Establishment Number

The following operations were being conducted in the eight establishments:

Pork slaughter and boning - four establishments (27, 193, and 378)

Pork boning and canning – four establishments (129, 242, 153, and 55)

Veal slaughter and boning – one establishment (369)

#### SANITATION CONTROLS

Based on the on-site audits of establishments, Netherlands inspection system had controls in place for water potability records; chlorination procedures; back-siphonage prevention; hand washing facilities; pest control monitoring; separation of operations; temperature control; work space; ventilation, ante-mortem facilities; welfare facilities; outside premises; and personal dress and habits.

The auditor's findings are presented below for the areas of SSOP, cross-contamination, product handling and storage, product reconditioning, and personal hygiene and practices.

#### Sanitation Standard Operating Procedures (SSOP)

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 in the eight establishments were found to meet the basic FSIS regulatory requirements with the following deficiencies.

- In all establishments, the written SSOP procedure did not adequately address pre-operational sanitation.
- In all establishments, the written SSOPs did not adequately address operational sanitation.
- In one establishment, the SSOP procedure did not identify the individual responsible for implementing and maintaining the activities.
- In all establishments, the daily pre-operational and operational sanitation deficiencies were not identified most of the time and any corrective actions taken were not adequately documented by the establishment personnel.

Cross-Contamination: In the area of cross-contamination, actual product contamination and the potential for product contamination was found in seven out of the eight establishments audited. In some establishments, but not all, the GON took corrective actions. Specific findings for each establishment audited on-site can be found in Attachment F.

Examples of findings of actual product contamination include:

- In five establishments, dripping condensate, from overhead refrigeration units, ceilings, pipes, beams, ducts, exhaust system, deteriorated and broken insulation on ducts that were not cleaned/sanitized daily, was falling onto carcasses and exposed edible product in the slaughter room, coolers, boning rooms, and processing rooms.
- In two establishments, sanitizers were not maintained at the required temperature (82° C) in the boning rooms during the operation. In another two establishments, there was no sanitizing facility for knives and the circular saw in the cut-up and boning rooms. In one of these establishments, the automatic hog carcass splitting saw was not sanitized completely and effectively between each use in the slaughter room. In two establishments, automatic viscera and offal conveyors were not sanitized in the slaughter room. In two establishments, knives were not sanitized between each use during sticking operations.
- In one establishment, the automatic viscera conveyor and offal hook conveyor in the slaughter room were soiled with blood and fat after washing/sanitizing in the slaughter room. In three establishments, hog and calf carcasses were contacting employees' working platforms and employees' boots, stands, container for inedible products, automatic dirty hide removal in the slaughter rooms. In one of these establishments, numerous calf carcasses were dragging along the floor in the slaughter, coolers, hallway and cut-up rooms and in the same establishment removal of dirt and extraneous materials from hind quarters with vacuum was not being done in a sanitary manner.
- In six establishments, insanitary equipment was directly contacting edible product in the processing rooms, offal rooms, boning rooms, and slaughter rooms. For example, containers of edible product, meat hooks, meat racks, employees' scabbards, tumblers, and container for brine solution were found with fat, dried pieces of meat, blood, dirt, grease, black discoloration and detergent residue from previous days' operations.

Examples of findings of potential cross-contamination of product include:

- In one establishment, employees were crossing over unprotected conveyor belts for edible products in the cut-up room. In another establishment, containers of edible product were kept too close to a hand washing facility creating the potential for the splashing of dirty water during hand washing; dirty unskinned tails were swinging heavily over exposed carcasses after hide removal station creating the potential for dirt and fecal contamination.
- In three establishments, overhead pipes, beams, lights, and protective coverings in the slaughter and processing rooms were observed with accumulations of fat, old pieces of meat, dirt, dust, grease, and mold.
- In five establishments, several employees were observed picking up dirty objects from the floor, handling containers of inedible product, using a dirty steel and a meat scrapper which were kept in the sink, handling dirty pallets, picking up pieces of meat from the

floor and, without washing their hands and washing/sanitizing dirty equipment, handling edible product.

Product Handling and Storage: In the area of product handling and storage, the following deficiencies were found. Establishment officials took corrective actions.

- In one establishment, carcasses were found with grease, hair, pieces of hide, and fecal materials in the coolers and, in the same establishment, carcasses were found with grease, hair, pieces of hide after pre-boning trim in the boning room.
- In one establishment, exposed edible product was contacting dirty pallets in the meat grinding room.
- In three establishments, product that contacted the floor (dropped meat) was not reconditioned in a sanitary manner before being added to the edible product such as: several pieces of dropped meat and pieces of meat with abscesses were collected in the same container for trimming; some employees were only scrapping contamination from meat or singeing meat with a gas torch instead of trimming.
- In three establishments, containers for edible and inedible product were not identified to prevent possible cross contamination.
- In two establishments, pest control prevention was inadequate. For example, in both establishments, gaps at the bottoms of doors in the dry storage and shipping rooms were not sealed properly to prevent the entry of rodents and other vermin. In one of these establishments, there was no air-curtain or other device on the door in the offal room to prevent the entry of insects and other vermin. Establishment officials ordered correction.

### ANIMAL DISEASE CONTROLS

The Netherlands inspection system had controls in place to ensure adequate animal identification, ante-mortem and dispositions, condemned and restricted product control, and procedures for sanitary handling of returned and rework products.

There were reported to have been no outbreaks of animal diseases with public-health significance since the previous U.S. audit. In addition, the Netherlands is not declared free from hog cholera disease by APHIS, although OIE has declared Netherlands free of hog cholera disease. The U.S. does not import any beef from the Netherlands

### RESIDUE CONTROLS

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

## Farm Visit

The Verbeek farm, located in Ubbeschoterweg 8A, 3927 CJ, Renswoude, was visited on October 18, 2001. It is a small swine-breeding farm on a thirteen-hectare land with about 1750 sows and boar including market hogs.

A full time private veterinarian makes the diagnosis, writes the prescription and administers the drugs for treatment. Animals are identified by a single earmark, which identifies the farm, as well as a tattooing mark before leaving farm, the month of the birth of the animal and the code for the farm (premises). Medicated feeds are not given to sows, boars and young pigs or breeding stock on this farm.

General Inspection Service (AID) is required to analyze one sample of feed each year to demonstrate that feed is not medicated and if there is any doubt then the feed delivery company is required to take more samples. In the Netherlands, sixty percent of farmers are not using medicated feeds.

The swine farm that was visited is licensed to store animal drugs on site. Farms must be specifically approved to store animal drugs on the premises. On those farms which are not approved to store drugs, the veterinarian may only prescribe drugs in amounts that can be used immediately. Records are maintained on all animal drugs requiring prescription, which are written in duplicate so that copies can be maintained by the prescribing veterinarian and filed at the farm. The General Inspection Service officials cross check and verify all the prescriptions written or dispensed on the farm three times a year.

Certificates (affidavits) are issued for every group of animals moving off of the farm, whether to another farm or to slaughter. Any drugs applied to animals within 75 days of slaughter will be recorded on the transportation documents, with a copy of the prescription attached. Drug inventory and use records are maintained and all drugs are controlled in a locked cabinet or refrigerator.

The National Program for Residue Control is based on European Community legislation in force related to the ban of hormonal substances (Council Directive 96/22/EC April 1996) and the control of residues on live animals and animal products (Council Directive 96/23/EC of April 1996).

## Reporting Positive Results

Though no violations had occurred at the farm visited, the Regional authorities confirmed that violations are followed up on a case-by-case approach, depending upon the substance in question. At the farm, the General Inspection Service (AID) will increase inspections but may not take a sample every time. If animal samples are found to be positive, the AID launches an investigation into the cause. Animals from which positive samples are taken are seized and destroyed. In case of illegal growth promoters additional sampling must be carried out. The number of animals to be sampled equals the root + 1 of the number of animals present. If positive samples are subsequently detected in one or more animals, all

the animals present on the holding must be sampled. Only those animals from which positive samples are taken are destroyed. Fines can be imposed as a penalty.

## SLAUGHTER/PROCESSING CONTROLS

Except as noted below, the Dutch inspection system had controls in place to ensure adequate animal identification; antemortem inspection procedures; antemortem disposition; humane slaughter; postmortem dispositions; restricted product control; ingredients identification; control of restricted ingredients; formulations; packaging materials; label approvals; inspector monitoring; processing equipment; processing records; empty can inspection; filling procedures; container closure examination; and post-processing handling.

### HACCP Implementation

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

The HACCP programs were reviewed during the on-site audits of eight establishments. The auditor found the following deviations from FSIS regulatory requirements.

- In two establishments, the HACCP plan did not have a flow chart that describes the process steps and product flow.
- In four establishments, the HACCP plan did not adequately conduct a hazard analysis.
- In eight establishments, the HACCP plan did not specify critical limits for each CCP and the frequency with which these procedures would be performed.
- In eight establishments, the HACCP plan did not address adequately the corrective actions to be followed in response to deviations from critical limits.
- In eight establishments, the HACCP plan was not validated to determine if it was functioning as intended.
- In eight establishments, the HACCP plan did not adequately state the procedures that the establishment would use to verify that the plan was being effectively implemented and the frequencies with which these procedures would be performed. The on-going verification activities of the HACCP program were not adequately performed either by the establishment personnel or by the GON meat inspection officials.
- In eight establishments, the HACCP plan's record keeping system was not documenting the monitoring of CCPs.
- In eight establishments, the final review of all documentation associated with the production of the product prior to shipping was not done.

## Testing for Generic *E. coli*

The Netherlands has adopted the FSIS regulatory requirements for generic *E. coli* testing with the exception of the following equivalent measures. Four of the eight establishments audited were required to meet the basic FSIS regulatory requirements for generic *E. coli* testing. These four establishments were evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment C).

### 1. INDICATOR MICROORGANISM: Different Organism.

- The Netherlands uses Enterobacteriaceae as its indicator organism. This microorganism is an indicator for fecal contamination.
- The microorganism is as sensitive as generic *E. coli* in measuring the control of fecal contamination throughout the slaughter and dressing operations.

### 2. GENERIC *E. COLI* TESTING STRATEGY:

- Testing frequency is ten tests per week.
- The predominant class of animals slaughtered in an establishment is sampled.

### 3. SAMPLING SITES:

- The Netherlands samples swine at four sites: flank, brisket, rump, and back. The sample sites include the sites most likely to be contaminated with fecal contamination.
- The sample sites encompass a large enough surface area to ensure that the effectiveness of the slaughter process controls will be evaluated.
- The sample sites provide the same probability of detecting the presence of fecal contamination as the sites chosen by FSIS.

### 4. SAMPLING TOOL

- The Netherlands uses a cork borer-sampling tool. The cork borer is a traditional or generally recognized sample collection tool for sampling for *E. coli* on meat or poultry surfaces.
- The tool is sensitive enough to gather *E. coli* present on the sample site.
- The tool does not contaminate the surfaces of the carcass.

The following deficiencies were noted.

- In one establishment, the procedure did not designate the employee(s) responsible for collecting the samples.
- In one establishment, the procedures did not designate the establishment location for sample collecting.
- In three establishments, the carcass selection was not made randomly and the random method was not specified in the procedure.

Additionally, establishments had adequate controls in place to prevent meat products intended for Netherlands 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 establishments (27 and 369), the Dutch inspection system controls [ante-mortem inspection procedures and dispositions, control of restricted product and inspection samples, control and disposition of dead, dying, diseased or disabled animals, 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, and documentation, the importation of only eligible livestock from other countries (i.e., only from eligible countries and certified establishments within those countries), 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

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

The Netherlands has adopted the FSIS regulatory requirements for *Salmonella* testing with exception of the following equivalent measures. However, for the testing of carcasses for the presence of *Salmonella*, the sponge method, and not the corkbore method, is used in the targeted and screening analysis.

#### 1. SALMONELLA TESTING STRATEGY.

- The Netherlands uses a continuous, on-going sampling program to determine when to initiate additional *Salmonella* testing. All U.S. export establishments are included in the same pool. The sampling methodology is based on a uniform system approach in all applicable export establishments. Following an initial sample set in each applicable establishment; continuous sampling is used to initiate additional *Salmonella* testing. The on-going sampling program used in the four “small” establishments occurs at a rate of one sample every 4 weeks
- Three consecutive positive screenings initiates the Target Program.

- The Target Program is identical to FSIS program except that it is automatically initiated every 3 years, unless positive results are found. Sampling is thereby tightened, as stated below.
- After a screening failure, if standard is met after 1<sup>st</sup> set: target program, sampling is re-initiated in two years. (2) If 1<sup>st</sup> set fails but 2<sup>nd</sup> set meets the standard, sampling is re-initiated in two years. (3) If 2<sup>nd</sup> set fails but 3<sup>rd</sup> set meets the standard, sampling is re-initiated the following year.
- The Netherlands uses a continuous, on-going sampling program to determine when to initiate additional *Salmonella* testing. All products for which there is a U.S. performance standard are included in the sample pool.
- The Netherlands testing program has statistical criteria for evaluating test results.
- The percentage of *Salmonella* positives over time meets the FSIS performance standard.

## 2. SAMPLING TOOLS.

- The Netherlands uses a cork borer-sampling tool. The cork borer is a traditional or an internationally recognized sample collection tool for sampling *Salmonella* on meat or poultry product surfaces.
- The sampling tool is sensitive enough to gather *Salmonella* that are present at the sample site.
- The sampling tool does not contaminate the surfaces of the carcass.

### 1. SAMPLING TECHNIQUES: Time of collection.

- Samples are taken at the end of the slaughter or production process.
- Samples are taken prior to the carcass being cut and/or packaged.

### 2. SAMPLING TECHNIQUES: Depth of excision.

- The Netherlands uses the cork-borer method to collect samples and the method excises tissue to a depth of 2.5 mm. The cork-borer method collects all surfaces area *Salmonella* from the tissues excised without contaminating the carcass.

### 3. SAMPLING TECHNIQUES: Compositing Samples.

- Samples are “composited” in the same whirl –pack at the sample sit. Each entire collection-site that is sampled (i.e. the sample tissue area) is included in the composite sample and the entire composite is analyzed for *Salmonella*.
- The sample sites include the sample collection area from all three FSIS sample sites.

### 4. ANALYTICAL METHODS: Different Methods.

- The laboratories use ISO 6579 to analyze for *Salmonella*. ISO 6579 is an internationally recognized method of analysis for detecting *Salmonella* and is closer to the FSIS method than the AOAC methods.

## 5. LOCATION AND SIZE OF SAMPLE SITES:

- Sampling is accomplished by boring 4/5" bores per site. The cork-borer method is capable of collecting all of the surface *Salmonella* at each sample site. This method collects 20 cm<sup>2</sup> from each FSIS designated site, resulting in a composite sample of 60 cm<sup>2</sup>.
- The sample size and sites provide the same probability of detecting the presence of *Salmonella* as the FSIS sample sites.

The following deficiencies were noted.

- In three establishments, the samples were not being taken randomly.

### Species Verification Testing

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

- Species verification testing is not carried out by the National Inspection Service for Livestock and Meat (RVV) officials as required.

### *Listeria monocytogenes*

- The control of *Listeria monocytogenes* is not included in the HACCP plan in establishments producing ready-to-eat products.
- Establishment officials have a surveillance program for *Listeria monocytogenes* testing at variable frequencies of sampling such as per week/month and/or per year in establishments producing ready-to-eat products. The RVV meat inspection service was taking between five to ten samples per year for *Listeria monocytogenes*.

### Monthly Reviews

The internal review program was applied equally to both export and non-export establishments. Internal review visits were not announced in advance, and were conducted, at times by individuals and at other times by a team of reviewers, twice a year. The records of audited establishments were kept in the inspection offices of the individual establishments, and copies were also kept in the district or regional offices, and were routinely maintained on file for a minimum of two years.

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 team of auditors is empowered to conduct an in-

depth review, and the results are reported to district and region for evaluation; they formulate a plan for corrective actions and preventive measures.

The following deficiencies were noted.

- In all eight establishments, monthly supervisory visits were not performed. Only two internal reviews were conducted per year by the district or regional auditors.
- In all establishments producing processed products, GON meat inspection officials were not providing adequate daily inspection coverage. Inspectors were visiting establishments at variable frequencies such as once a week, once a month, four times a year, daily, and between one to four hours each visit.
- In all establishments producing processed products, GON meat inspection officials were not providing daily inspection coverage for second and third shift operations.

### Enforcement Activities

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

Enforcement activities are carried out by district/regional officials, which have full power to initiate all enforcement actions.

### Inspection system Controls

- In two establishments, inspectors were not correctly performing post-mortem inspection procedures such as: large calves the lateral masticatory muscles on head were not properly incised and observed; the medial masticatory muscles were not incised; the lymph nodes of head, liver, and lungs were not incised and observed; the mandibular lymph nodes of swine heads were not properly incised and observed, and the liver, lungs, and mesenteric lymph nodes were not palpated as required. GON inspection officials did not take any corrective action.
- In one establishment, post-mortem inspection correlation between hog carcass and viscera was not maintained such as: one carcass dropped on the floor prior to inspection and the viscera for that carcass was not retained for proper post-mortem inspection.
- In four establishments, the zero tolerance for visible fecal material/ ingesta contamination, and milk on carcasses was not enforced by the GON meat inspection officials, and there was no monitoring record maintained to verify this activity.
- In three establishments, containers for edible and inedible product were not identified to prevent possible product cross contamination.

## Exit Meetings

On October 23, 2001, an exit meeting with the Netherlands government officials was held at the Voorburg offices of the National Inspection Service for Livestock and Meat (RVV). The Dutch government participants were Dr. Jan van den Berg, Deputy Director, National Inspection Service for Livestock and Meat (RVV); Dr. Luuk van Duijn, Head of the Inspection Department (LNV); Dr. Ron Dwinger, Policy Advisor (LNV); Dr. Henk Keukens, Head of RVV Laboratories (LNV); Dr. Jan Bloemendal, Policy Advisor, Ministry of Agriculture, Nature Management and Fisheries (VVM); Dr. J. Peelen, South Regional Director (RVV); Dr. J. Haverkort, East Regional Director (RVV); Dr. M. T. Ijzerman, District Head, North Region (RVV); and Mr. Gerke Corstiaensen, Meat Industry Representative. The United States government participants were Mr. Bob Flach, Agricultural Specialist, American Embassy, The Hague, and Dr. Faizur R. Choudry, International Audit Staff Officer, Food Safety and Inspection Service (FSIS).

A second meeting was conducted with the European Commission (EC) in Brussels, Belgium on October 24, 2001. The EC participants were Dr. Paolo Dhostby, DG, Health and Consumer Protection Directorate General (SANCO), Unit E-3. The Dutch government participants were Dr. Jan Bloemendal, Dr. Luuk van Duijn, Dr. Ron Dwinger and Dr. Star Van der Meijs, Veterinary board at the Dutch Embassy for the EU in Brussels. The participants from the United States were Ms. Sally Stratmoen, Chief, Equivalence, International Policy Staff, FSIS (by telephone); Dr. Faizur R. Choudry, International Audit Staff Officer, FSIS; Ms. Melinda D. Sallyards, Agricultural Attaché, United States Mission to the European Union, Foreign Agricultural Service, Brussels.

The auditor explained to the GON inspection officials that their inspection system was audited in accordance with the European Union/United States Veterinary Equivalence Agreement, the auditors audited the meat inspection system using European Directives, specifically Council Directives 96/23/EC of April 29, 1996, 96/22/EC of April 29, 1996, and 64/433/EEC of June 1964. These three directives have been declared equivalent under the Agreement. In areas not covered by these directives, the auditors audited against FSIS requirements and equivalence determinations.

The following topics were discussed:

- The continuing problems with the implementation and maintenance of SSOP in certified establishments.
- The continuing problems with implementation and maintenance of HACCP systems in certified establishments.
- Instances of actual product contamination and instances of the potential for direct product contamination.
- Inadequate inspection system controls, including the identification of containers for edible and inedible product, enforcement of the zero-tolerance policy for visible fecal material/ingesta contamination, and milk on carcasses, lack of post-mortem inspection procedures to check for disease, and carcass and offal inspection requirements.

- The lack of adequate daily inspection coverage in establishments producing products for export to the U.S.
- The lack of periodic supervisory reviews of certified establishments.
- The lack of daily inspection coverage for second and third shift operations of processing establishments.
- In all establishments, the final review of all documentation associated with the production of the product prior to shipping was not done.
- In both laboratories (RIKILT and RVV), the quality assurance program was not adequately maintained such as check samples programs, there was no documentation for any corrective actions taken when percent recovery results fell below the established acceptable range limit, and the standards book was not maintained for quality assurance program.
- Timely analyses, samples for chlorinated hydrocarbons, polychlorinated biphenyls, organophosphates, trace elements, hormones, and nitrogen pesticides were not analyzed in a timely manner such as samples were analyzed and completed between 6 to 12 weeks. This is extremely critical for OP, DES, Sulfonamides, and A.B. testing.
- In six establishments, the carcass selection was not made randomly and the random method was not specified in the procedure for the testing of generic *E. coli*.
- In seven establishments, inspectors were not taking samples randomly for *Salmonella* testing.
- RVV does not have a microbiological monitoring program for finished products, which includes 'scheduled' or 'directed' testing (*Salmonella* and *Listeria*) for ready-to-eat product.

Dr. Jan van den Berg, Deputy Director, (RVV), stated that he would take the necessary steps to ensure that corrective actions and preventive measures, including HACCP, SSOP, sanitation problems, and monthly visits as promised during the audits and exit meetings in the individual establishments would be implemented.

## CONCLUSION

The Dutch meat inspection system has major deficiencies, which demonstrates a lack of government oversight as evidenced by the findings presented in this report and summarized below.

Eight establishments were audited: six were evaluated as acceptable/re-review, and two were unacceptable. The GON meat inspection officials reinforced the assurances made by the field personnel during and at the conclusions of the on-site audits of the establishments, and stated that they would ensure prompt compliance. However, these assurances have been given previously at the conclusion of the February 1999 and February 2000 audits, and some corrective actions taken were not adequate.

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 Forms
- 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
27	√	no	no	√	√	√	no	√
129	√	no	no	√	√	√	no	√
193	√	no	no	√	√	√	no	√
369	√	no	no	√	√	√	no	√
378	√	no	no	√	√	√	no	√
242	√	no	no	√	√	√	no	√
153	√	no	no	√	√	no	no	√
55	√	no	no	√	√	√	no	√

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

60	√	√	√	√	√	√	no	√
64	√	√	√	√	√	√	no	√
101	√	√	no	√	√	√	no	√
82	√	√	√	√	√	√	√	√
312	√	√	√	√	√	√	√	√
160	√	√	√	√	√	√	no	√
236	√	√	√	√	√	√	no	√

### Data Collection Instrument for HACCP Programs

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

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

The results of these evaluations were as follows:

Est. #	1. Flow diagram	2. Hazard analysis conducted	3. Use & users included	4. Plan for each hazard	5. CCPs for all hazards	6. Monitoring is specified	7. Corr. actions are described	8. Plan validated	9. Adequate verific. procedures	10. Adequate documentation	11. Dated and signed	12. Pre-shipment doc. review
27	√	no	√	√	√	no	no	no	no	no	√	no
129	√	no	√	√	√	no	no	no	no	no	√	no
193	√	√	√	√	√	no	no	no	no	no	√	no
369	√	√	√	√	√	no	no	no	no	no	√	no
378	√	no	√	√	√	no	no	no	no	no	√	no
242	no	no	√	√	√	no	no	no	no	no	√	no
153	no	√	√	√	√	no	no	no	no	no	√	no
55	√	√	√	√	√	no	no	no	no	no	√	no

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 conducted	3. Use & users included	4. Plan for each hazard	5. CCPs for all hazards	6. Monitoring is specified	7. Cor. actions are described	8. Plan validated	9. Adequate verific. procedures	10. Adequate documentation	11. Dated and signed	12. Pre-shipment doc. review
60	√	√	√	√	√	no	no	√	no	√	√	no
64	√	no	√	√	√	no	no	√	no	no	√	no
101	√	√	√	√	√	no	no	√	no	no	√	no
82	√	√	√	√	√	√	√	√	no	√	√	no
312	√	no	√	√	√	no	no	√	no	no	√	no
160	√	√	√	√	√	no	no	√	no	no	√	no
236	√	no	√	√	√	no	no	no	no	no	√	no

### Data Collection Instrument for Generic *E. coli* Testing

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

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

Est. #	1. 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
27	√	no	√	√	√	√	no	√	√	√
193	√	√	√	√	√	√	√	√	√	√
369	√	√	√	√	√	√	no	√	√	√
378	√	√	no	√	√	√	no	√	√	√

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

60	√	√	√	√	√	√	no	√	√	√
64	√	√	√	√	√	√	√	√	√	√
312	√	√	√	√	√	√	no	√	√	√
236	√	√	√	√	√	√	no	√		√
160	√	√	√	√	√	√	√	√	√	√

### 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
27	√	√	N/A	no	√	√
193	√	√	N/A	no	√	√
369	√	√	N/A	√	√	√
378	√	√	N/A	no	√	√

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

60	√	√	N/A	no	√	√
64	√	√	N/A	no	√	√
312	√	√	N/A	no	√	√
236	√	√	N/A	√	√	√
160	√	√	N/A	no	√	√

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

REVIEW DATE

NAME OF FOREIGN LABORATORY

10/17/01

State Institute for Quality Control of Agricultural Products (RIKILT)

**FOREIGN COUNTRY LABORATORY REVIEW**

FOREIGN GOV'T AGENCY  
 Department of Wageningen University and Research Center (WUR)

CITY & COUNTRY  
 Wageningen, Netherlands

ADDRESS OF LABORATORY  
 Building No 123 Bornsesteeg 45, Wageningen

NAME OF REVIEWER  
 Dr. Faiz R. Choudry

NAME OF FOREIGN OFFICIAL  
 dr. R. Dwinger; Ms. A. Vermunt, Head Department of Q.C; & Mr. A. Roos, Q.C.

Residue Code/Name			100	111	300	400	500	600								
SAMPLING PROCEDURES	REVIEW ITEMS	ITEM #	EVALUATION CODE													
	Sample Handling	01	A	A	A	A	A	A								
	Sampling Frequency	02	A	A	A	A	A	A								
	Timely Analyses	03	C	C	C	C	C	C								
	Compositing Procedure	04	O	O	O	O	O	O								
	Interpret Comp Data	05	O	O	O	O	O	O								
	Data Reporting	06	A	A	A	A	A	A								
ANALYTICAL PROCEDURES	Acceptable Method	07	A	A	A	A	A	A								
	Correct Tissue(s)	08	A	A	A	A	A	A								
	Equipment Operation	09	C	C	C	C	A	C								
	Instrument Printouts	10	A	A	A	A	A	A								
QUALITY ASSURANCE PROCEDURES	Minimum Detection Levels	11	A	A	A	A	A	A								
	Recovery Frequency	12	A	A	A	A	A	A								
	Percent Recovery	13	C	A	A	A	A	C								
	Check Sample Frequency	14	C	C	C	C	A	C								
	All analyst w/Check Samples	15	A	A	A	A	A	A								
	Corrective Actions	16	C	C	C	N	C	C								
	International Check Samples	17	C	C	C	C	A	C								
REVIEW PROCEDURES	Corrected Prior Deficiencies	18	O	O	O	O	O	O								
OTHER REVIEW		19														
		20														

SIGNATURE OF REVIEWER

DATE

<b>FOREIGN COUNTRY LABORATORY REVIEW</b> <i>(Comment Sheet)</i>		REVIEW DATE 10/17/01	NAME OF FOREIGN LABORATORY State Institute for Quality Control of Agricultural Products (RIKILT)
FOREIGN GOV'T AGENCY Department of Wageningen University and Research Center (WUR)		CITY & COUNTRY Wageningen, Netherlands	ADDRESS OF LABORATORY Building No 123 Bornsesteeg 45, Wageningen
NAME OF REVIEWER Dr. Faiz R. Choudry		NAME OF FOREIGN OFFICIAL dr. R. Dwinger; Ms. A.Vermunt, Head Department of Q.C; & Mr. A. Roos, Q.C.	

RESIDUE	ITEM	COMMENTS
100,111, 300,400, 500,600	3	Samples for chlorinated hydrocarbons (CHC), polychlorinated biphenyls (PCBs), organophosphates (OP), trace elements (TE), hormones (H), and nitrogen pesticides (NP) were analyzed between 6 to 12 weeks.
300,400, 500,600	9	Standards book for organophosphates, nitrogen pesticides, and trace elements was not maintained for quality assurance program.
112,602, 604.	13,16	When percent recovery results for hexachlorobenzene "HCB" (71.9%), methomyl (51.7%), and propoxur (60.7%) were fallen below the established acceptable limit (80%) and any corrective actions taken were not documented.
100,111, 300,400, 600	14,17	Intralaboratory and/or interlaboratory check samples for quality assurance program were not performed for chlorinated hydrocarbons, polychlorinated biphenyls, organophosphates, nitrogen pesticides, and trace elements.

10/19/01

Laboratory of the Inspection Service for Livestock and Meat (RVV)

**FOREIGN COUNTRY LABORATORY REVIEW**

FOREIGN GOV'T AGENCY  
 National Inspection Service for Livestock and Meat

CITY & COUNTRY  
 Wageningen, Netherlands

ADDRESS OF LABORATORY  
 Postbus 144 6700 AC Wageningen,

NAME OF REVIEWER  
 Dr. Faiz R. Choudry

NAME OF FOREIGN OFFICIAL  
 Dr. Ron Dwinger & Mr. H. J. Keukens, Head of Laboratory for Livestock and Meat

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

SIGNATURE OF REVIEWER

DATE

<b>FOREIGN COUNTRY LABORATORY REVIEW</b> <i>(Comment Sheet)</i>		REVIEW DATE 10/19/01	NAME OF FOREIGN LABORATORY Laboratory of the Inspection Service for Livestock and Meat (RVV)
FOREIGN GOV'T AGENCY National Inspection Service for Livestock and Meat		CITY & COUNTRY Wageningen, Netherlands	ADDRESS OF LABORATORY Postbus 144 6700 AC Wageningen,
NAME OF REVIEWER Dr. Faiz R. Choudry		NAME OF FOREIGN OFFICIAL Dr. Ron Dwinger & Mr. H. J. Keukens, Head of Laboratory for Livestock and Meat	

RESIDUE	ITEM	COMMENTS
500	9	Standards book for hormones was not maintained for quality assurance program.
500, 800	13, 17	When percent recovery results for hormones and sulfadimethoxine (46.9%) were fallen below the established acceptable limit and any corrective actions taken were not documented.

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE INTERNATIONAL PROGRAMS  <b>FOREIGN PLANT REVIEW FORM</b>	REVIEW DATE  10/05/01	ESTABLISHMENT NO. AND NAME  Est. 27 Sturko Meat Eindhoven B.V.	CITY Son en Breugel  COUNTRY Netherlands
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NAME OF REVIEWER Dr. Faiz R. Choudry	NAME OF FOREIGN OFFICIAL Dr. Ron Dwinger, Staff Office	EVALUATION <input type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input checked="" 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

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

FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE	ESTABLISHMENT NO. AND NAME	CITY
	10/05/01	Est. 27 Sturko Meat Eindhoven B.V.	Son en Breugel
			COUNTRY
			Netherlands
NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL	EVALUATION	
Dr. Faiz R. Choudry	Dr. Ron Dwinger, Staff Office	<input type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input checked="" type="checkbox"/> Unacceptable	

COMMENTS:

05. Several sanitizers were not maintained at the required temperature (82C) in the boning room. Neither establishment nor GON inspection officials took corrective action.
07. Gaps at the bottom of door in the product shipping room were not sealed properly to prevent the entry of rodents and other vermin. Establishment officials ordered correction.
11. Light was inadequate at the head and carcass inspection stations.
17. Dripping condensate, from overhead refrigeration units, ceilings, pipes, beams, and deteriorated and broken insulation on ducts was not cleaned/sanitized daily, was falling onto hog carcasses, in the slaughter room, boning room, and all coolers. Neither establishment nor GON inspection officials took corrective action.
18. Overhead pipes, beams, and lights in the slaughter room were observed with accumulations of dust, dirt, lights with mold, and dried pieces of meat and fat. Establishment officials ordered correction.
19. Dried pieces of meat, blood, product residues from previous day's operation were observed on containers and racks for edible product in the offal cooler. Fat, grease, and black discoloration was observed on meat hooks in the hallway. Neither establishment nor GON inspection officials took corrective action.
26. Several employee's were not using hygienic work habits to prevent product contamination such as: Employee's were observed using dirty steels which were kept in the sink and without washing their hands or sanitizing their knives handled edible product in the slaughter room. Neither establishment nor GON inspection officials took corrective action.
28. a) Hog carcasses were contacting work platforms, container for inedible product, stands, and employees' boots in the slaughter. b) Automatic viscera and offal conveyors were observed with fat and blood after washing/sanitizing in the slaughter room. Neither establishment nor GON inspection officials took corrective action.
29. a) Automatic carcass splitting saw was not sanitized completely and effectively between each use; b) An employee was not sanitizing knife between each use during carcass stiching in the slaughter room. Neither establishment nor GON inspection officials took corrective actio.
31. Product that contacted the floor was not reconditioned in a sanitary manner before being added to the edible product such as several pieces of meat with dirt and abscesses were collected in the same container. Table for reconditioning product was found with grease, and dirt and was not washed/sanitized between each use.
- 33,34, 35.a) The daily pre-operational and operational sanitation deficiencies were not identified and any corrective action taken were not documented by the establishment personnel and monitoring records did not reflect the actual sanitary conditions observed in the establishment; b) GON inspection officials were not identifying the pre-operational and operational sanitation deficiencies and any corrective actions taken were not being maintained.
43. Containers for edible and inedible product were not identified in the boning room.
76. Monthly supervisory visits were not conducted. Only two internal reviews were made per year.
80. Because of gross product contamination and lack of a compliance with daily pre-operational and operational sanitation/equivalent sanitation programs and procedures, and inadequate inspectional controls, the sanitation status of this establishment is not equivalent to that required in the U.S. program and HACCP programs noncompliance with FSIS regulatory requirements . All the above deficiencies were discussed with Dr. Ron Dwinger, Staff Officer, and he agreed to remove Establishment 27 from the list of establishments eligible to export meat and meat products to the United States, effective October 5, 2001.
82. FSIS basic regulatory requirements of HACCP program were not met (please see attachment F).

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE INTERNATIONAL PROGRAMS		REVIEW DATE	ESTABLISHMENT NO. AND NAME		CITY	
<b>FOREIGN PLANT REVIEW FORM</b>		10/10/01	Est. 369 B.V. Exportslachterij Apeldoorn ESA		Apeldoorn	
				COUNTRY Netherlands		
NAME OF REVIEWER Dr. Faiz R. Choudry		NAME OF FOREIGN OFFICIAL Dr. Ron Dwinger & Dr. Harmsen, Auditor		EVALUATION <input type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input checked="" type="checkbox"/> Unacceptable		
CODES (Give an appropriate code for each review item listed below) A = Acceptable    M = Marginally Acceptable    U = Unacceptable    N = Not Reviewed    O = Does not apply						
1. CONTAMINATION CONTROL		Cross contamination prevention		28 U	Formulations	55 O
(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing		29 U	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 U	Effective maintenance program		33 M	Processing schedules	61 O
Establishments separation	06 A	Preoperational sanitation		34 M	Processing equipment	62 O
Pest --no evidence	07 M	Operational sanitation		35 U	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 U	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 M	5. COMPLIANCE/ECON. FRAUD CONTROL	
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control		44 A	Export product identification	72 A
Over-product ceilings	17 U	Returned and rework product		45 A	Inspector verification	73 A
Over-product equipment	18 M	3. RESIDUE CONTROL			Export certificates	74 A
Product contact equipment	19 M	Residue program compliance		46 A	Single standard	75 A
Other product areas (inside)	20 A	Sampling procedures		47 A	Inspection supervision	76 M
Dry storage areas	21 A	Residue reporting procedures		48 A	Control of security items	77 A
Antemortem facilities	22 A	Approval of chemicals, etc.		49 A	Shipment security	78 A
Welfare facilities	23 A	Storage and use of chemicals		50 A	Species verification	79 A
Outside premises	24 A	4. PROCESSED PRODUCT CONTROL			"Equal to" status	80 U
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim		51 M	Imports	81 O
Personal dress and habits	25 A	Boneless meat reinspection		52 A	HACCP	82 U
Personal hygiene practices	26 M	Ingredients identification		53 O		
Sanitary dressing procedures	27 U	Control of restricted ingredients		54 O		

FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE 10/10/01	ESTABLISHMENT NO. AND NAME Est. 369 B.V. Exportslachterij Apeldoorn ESA	CITY Apeldoorn
			COUNTRY Netherlands
NAME OF REVIEWER Dr. Faiz R. Choudry	NAME OF FOREIGN OFFICIAL Dr. Ron Dwinger & Dr. Harmsen, Auditor	EVALUATION <input type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input checked="" type="checkbox"/> Unacceptable	

COMMENTS:

05. Sanitizer was not operating in the shipping room during the operation. There was no sanitizing facility for knives and saws to sanitize when contaminated in the primal parts cut-up room. Establishment officials ordered correction.
07. Gaps at the bottom of door in the dry storage room were not sealed properly and airtight curtain was not provided, door opening to outside from the offal room to prevent the entry of rodents and other vermin. Flies were observed in the offal room. Establishment officials ordered correction.
17. Dripping condensate, from overhead refrigeration units, ceilings, pipes, and from deteriorated and broken insulation on ducts was not cleaned/sanitized daily, was falling onto hog carcasses, in the slaughter room, boning room, and offal coolers. Neither establishment nor GON inspection officials took corrective action.
18. Overhead lights in the slaughter room were observed with accumulations of dust, dirt, insects, and mold. Establishment officials ordered correction.
19. Fat, blood, and dirt was observed on containers and racks for edible product in the offal cooler. Grease, and black discoloration was observed on meat hooks in the slaughter room. Dirt, grease, and black discoloration was observed on employees' scabbards in the slaughter and boning rooms. Neither establishment nor GON inspection officials took corrective action.
26. Several employee's were not using hygienic work habits to prevent product contamination such as: Employee's were observed using dirty steels which were kept in the sink and without washing their hands or sanitizing their knives handled edible product; Employees' handling unclean equipment were also handling edible product without washing hands; Container for edible products was kept too close to hand washing facility, potential for splash contamination during washing hands; Dirty unskinned tails were swinging heavily over skinned carcasses at the evisceration station, potential for dirt/fecal materials. Neither establishment nor GON inspection officials took corrective action.
27. Several calf carcasses were observed with hair, hide, grease, and fecal material in the coolers. Carcasses were observed with grease, dirt, cluster of hair, and hide after pre-boning trim in the boning room. Neither establishment nor GON inspection officials took corrective action.
28. a) Several calf carcasses were contacting work platforms, stands, and employees' boots in the slaughter. b) Forefeet and neck areas of carcasses were dragging along the floor in the slaughter room, coolers, hallways, and boning room. c) Skinned carcasses were contacting with dirty automatic hide puller. d) Removal of dirt and extraneous materials from hind quarters with vacuum was not being done in a sanitary manner in the slaughter room. Neither establishment nor GON inspection officials took corrective action.
29. Automatic viscera and offal conveyors were not sanitized as required in the slaughter room b) An employee was not sanitizing knife between each use during carcass sticking in the slaughter room. Neither establishment nor GON inspection officials took corrective action.
- 33,34, 35.a) The daily pre-operational and operational sanitation deficiencies were not identified and any corrective action taken were not documented by the establishment personnel and monitoring records did not reflect the actual sanitary conditions observed in the establishment; b) GON inspection officials were not verifying the adequacy and effectiveness of pre-operational sanitation and operational sanitation deficiencies were identified but any corrective actions taken were not documented.
41. The lymph nodes of head, lungs, and liver were not incised. The masticatory muscles of calf heads were only partially incised. GON inspection officials did not take any corrective actions.
43. Containers for edible and inedible product were not identified in the boning room.
51. Carcasses were observed with grease, dirt, hair clusters, and hide after pre-boning trim in the boning room.
76. Monthly supervisory visits were not conducted. Only two internal reviews were made per year.
80. Because of gross product contamination and lack of a compliance with daily pre-operational and operational sanitation/equivalent sanitation programs and procedures, and inadequate inspectional controls, the sanitation status of this establishment is not equivalent to that required in the U.S. program and HACCP programs noncompliance with FSIS regulatory requirements. All the above deficiencies were discussed with Dr. Ron Dwinger, Staff Officer, Dr. Harmsen, auditor, and they agreed to remove Establishment 369 from the list of establishments eligible to export meat and meat products to the United States, effective October 10, 2001.
82. FSIS basic regulatory requirements of HACCP program were not met (please see attachment F).

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE INTERNATIONAL PROGRAMS		REVIEW DATE	ESTABLISHMENT NO. AND NAME		CITY	
<b>FOREIGN PLANT REVIEW FORM</b>		10/16/01	Est. 55 Unilever Best Foods		Oss	
						COUNTRY Netherlands
NAME OF REVIEWER Dr. Faiz R. Choudry		NAME OF FOREIGN OFFICIAL Dr. Ron Dwinger		EVALUATION <input type="checkbox"/> Acceptable <input checked="" type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable		
CODES (Give an appropriate code for each review item listed below) A = Acceptable    M = Marginally Acceptable    U = Unacceptable    N = Not Reviewed    O = Does not apply						
1. CONTAMINATION CONTROL		Cross contamination prevention		28 A	Formulations	55 A
(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing		29 A	Packaging materials	56 A
Water potability records	01 A	Product handling and storage		30 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 M	Processing equipment	62 A
Pest --no evidence	07 A	Operational sanitation		35 M	Processing records	63 A
Pest control program	08 A	Waste disposal		36 A	Empty can inspection	64 A
Pest control monitoring	09 A	2. DISEASE CONTROL			Filling procedures	65 A
Temperature control	10 A	Animal identification		37 O	Container closure exam	66 A
Lighting	11 A	Antemortem inspec. procedures		38 O	Interim container handling	67 A
Operations work space	12 A	Antemortem dispositions		39 O	Post-processing handling	68 A
Inspector work space	13 O	Humane Slaughter		40 O	Incubation procedures	69 A
Ventilation	14 A	Postmortem inspec. procedures		41 O	Process. defect actions -- plant	70 A
Facilities approval	15 A	Postmortem dispositions		42 O	Processing control -- inspection	71 A
Equipment approval	16 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 U	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 M	Residue program compliance		46 O	Single standard	75 A
Other product areas (inside)	20 A	Sampling procedures		47 O	Inspection supervision	76 M
Dry storage areas	21 A	Residue reporting procedures		48 O	Control of security items	77 A
Antemortem facilities	22 O	Approval of chemicals, etc.		49 A	Shipment security	78 A
Welfare facilities	23 A	Storage and use of chemicals		50 A	Species verification	79 A
Outside premises	24 A	4. PROCESSED PRODUCT CONTROL			"Equal to" status	80 A
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim		51 O	Imports	81 A
Personal dress and habits	25 A	Boneless meat reinspection		52 O	HACCP	82 U
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
	10/16/01	Est. 55 Unilever Best Foods	Oss
			COUNTRY
			Netherlands
NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL	EVALUATION	
Dr. Faiz R. Choudry	Dr. Ron Dwinger	<input type="checkbox"/> Acceptable <input checked="" type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable	

COMMENTS:

17. Dripping condensate, from overhead refrigeration units, pipes, and overhead exhaust system that was not cleaned/sanitized daily, was falling onto exposed edible products in the product mincing room and meat ball cooking room. Neither establishment nor GON meat inspection officials took corrective actions.

19. Dried meat, fat, blood, grease, dirt, and detergent from previous day operation were observed on numerous containers for edible product and container for brine solution in the product receiving room and processing room. Establishment officials ordered corrections

34, 35.a) The daily pre-operational and operational sanitation deficiencies were not identified and any corrective action taken were not documented by the establishment personnel.

b) GON meat inspection officials were not monitoring/verifying the adequacy and effectiveness of pre-operational sanitation. The operationa sanitaion was monitored monthly and deficiencies were not identified and any corrective actions taken were not documented. The daily adequate inspection coverage was not provided. This is a three shift processing establishment and no inspection coverage was provided for second and third shift operations.

76. Monthly supervisory visits were not conducted. Only two internal reviews were made per year.

82. FSIS basic regulatory requirements of HACCP program were not met (please see attachment F).

**FOREIGN PLANT REVIEW FORM**

REVIEW DATE

10/08/01

ESTABLISHMENT NO. AND NAME

Est. 129  
Zwanenberg Food Group B. V.

CITY  
Almelo

COUNTRY  
Netherlands

NAME OF REVIEWER  
Dr. Faiz R. Choudry

NAME OF FOREIGN OFFICIAL  
Dr. Ron Dwinger

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 M	Laboratory confirmation	57 A
Chlorination procedures	02 A	Product reconditioning	31 A	Label approvals	58 A
Back siphonage prevention	03 A	Product transportation	32 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 M	Processing equipment	62 A
Pest --no evidence	07 A	Operational sanitation	35 M	Processing records	63 A
Pest control program	08 A	Waste disposal	36 A	Empty can inspection	64 A
Pest control monitoring	09 A	2. DISEASE CONTROL		Filling procedures	65 M
Temperature control	10 A	Animal identification	37 O	Container closure exam	66 A
Lighting	11 A	Antemortem inspec. procedures	38 O	Interim container handling	67 A
Operations work space	12 A	Antemortem dispositions	39 O	Post-processing handling	68 A
Inspector work space	13 O	Humane Slaughter	40 O	Incubation procedures	69 A
Ventilation	14 A	Postmortem inspec. procedures	41 O	Process. defect actions -- plant	70 A
Facilities approval	15 A	Postmortem dispositions	42 O	Processing control -- inspection	71 A
Equipment approval	16 A	Condemned product control	43 O	5. COMPLIANCE/ECON. FRAUD CONTROL	
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control	44 O	Export product identification	72 A
Over-product ceilings	17 U	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 M	Residue program compliance	46 O	Single standard	75 A
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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	HACCP	82 U
Personal hygiene practices	26 M	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
	10/08/01	Est. 129 Zwanenberg Food Group B. V.	Almelo
			COUNTRY
			Netherlands
NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL	EVALUATION	
Dr. Faiz R. Choudry	Dr. Ron Dwinger	<input type="checkbox"/> Acceptable <input checked="" type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable	

COMMENTS:

17. a) Dripping condensate, from overhead refrigeration units and pipes that was not cleaned/sanitized daily, was falling onto exposed edible products in the product receiving cooler and product mincing room. Neither establishment nor GON meat inspection officials took corrective actions.

b) Dripping condensate, from overhead ducts and ceilings that was not cleaned/sanitized daily, was falling onto cleaned containers for edible product in the equipment washing room. Establishment officials ordered correction.

19. All tumblers for edible product in the tumbler room were found with product residues from previous day's operation, dried pieces of meat, blood and dirt. Establishment officials ordered correction.

26. Several employees were not observing good hygienic work habits to prevent direct product contamination such as: during unwrapping of dirty packaged frozen product, picking up dirty pallets from the floor and, without washing their hands, handled edible products. Neither establishment nor GON meat inspection officials took corrective actions.

30. Exposed edible product was contacting dirty pallets and dirty plastic wrapping materials in meat grinder room.

34, 35.a) The daily pre-operational and operational sanitation deficiencies were not identified and any corrective action taken were not documented by the establishment personnel. GON inspection officials were not monitoring pre-operational sanitation and operational sanitation deficiencies and any corrective actions taken were not being maintained.

65. Excessive amount of product spilled on sides of cans at the filling machine potential for possible product contamination. Establishment officials ordered correction.

76. Monthly supervisory visits were not conducted. Only two reviews were made per year.

82. FSIS basic regulatory requirements of HACCP program were not met.

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE INTERNATIONAL PROGRAMS		REVIEW DATE	ESTABLISHMENT NO. AND NAME		CITY	
<b>FOREIGN PLANT REVIEW FORM</b>		10/15/01	Est. 153 Zwanenberg Food Group B.V.		Raalte	
					COUNTRY Netherlands	
NAME OF REVIEWER Dr. Faiz R. Choudry		NAME OF FOREIGN OFFICIAL Dr. Ron Dwinger, Staff Officer		EVALUATION <input type="checkbox"/> Acceptable <input checked="" type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable		
CODES (Give an appropriate code for each review item listed below) A = Acceptable    M = Marginally Acceptable    U = Unacceptable    N = Not Reviewed    O = Does not apply						
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Sanitizers	05 A	Effective maintenance program		33 A	Processing schedules	61 A
Establishments separation	06 A	Preoperational sanitation		34 M	Processing equipment	62 A
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Operations work space	12 A	Antemortem dispositions		39 O	Post-processing handling	68 A
Inspector work space	13 O	Humane Slaughter		40 O	Incubation procedures	69 A
Ventilation	14 A	Postmortem inspec. procedures		41 O	Process. defect actions -- plant	70 A
Facilities approval	15 A	Postmortem dispositions		42 O	Processing control -- inspection	71 A
Equipment approval	16 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 U	Returned and rework product		45 N	Inspector verification	73 A
Over-product equipment	18 M	3. RESIDUE CONTROL			Export certificates	74 A
Product contact equipment	19 A	Residue program compliance		46 O	Single standard	75 A
Other product areas (inside)	20 A	Sampling procedures		47 O	Inspection supervision	76 M
Dry storage areas	21 A	Residue reporting procedures		48 O	Control of security items	77 A
Antemortem facilities	22 O	Approval of chemicals, etc.		49 A	Shipment security	78 A
Welfare facilities	23 A	Storage and use of chemicals		50 A	Species verification	79 A
Outside premises	24 A	4. PROCESSED PRODUCT CONTROL			"Equal to" status	80 A
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim		51 O	Imports	81 A
Personal dress and habits	25 A	Boneless meat reinspection		52 O	HACCP	82 U
Personal hygiene practices	26 M	Ingredients identification		53 A		
Sanitary dressing procedures	27 O	Control of restricted ingredients		54 A		

FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE 10/15/01	ESTABLISHMENT NO. AND NAME Est. 153 Zwanenberg Food Group B.V.	CITY Raalte
			COUNTRY Netherlands
NAME OF REVIEWER Dr. Faiz R. Choudry	NAME OF FOREIGN OFFICIAL Dr. Ron Dwinger, Staff Officer	EVALUATION <input type="checkbox"/> Acceptable <input checked="" type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable	

COMMENTS:

17. Dripping condensate, from overhead pipes and ducts that was not cleaned/sanitized daily, was falling onto conveyor belt for edible products and sausages in the processing rooms. Neither establishment nor GON inspection officials took corrective action.

18. Overhead walkway over the sausage conveyor belt and several protective coverings over processed product conveyor belt in the processing room were observed with accumulations of dust, dirt, and fat. Establishment officials ordered correction.

26. An employee was not using hygienic work habits to prevent product contamination such as: meat scraper after washing was kept on the sink and, without washing hands and meat scraper handled edible product. Neither establishment nor GON inspection officials took corrective action.

34, 35.a) The daily pre-operational and operational sanitation deficiencies were not identified and any corrective action taken were not documented by the establishment personnel; b) GON inspection officials were not verifying the adequacy and effectiveness of the pre-operational sanitation. The daily operational sanitation was monitored monthly and identified deficiencies and any corrective actions taken were not documented.

76. Monthly supervisory visits were not conducted. Only two internal reviews were made per year.

82. FSIS basic regulatory requirements of HACCP program were not met (please see attachment F).

**FOREIGN PLANT REVIEW FORM**

REVIEW DATE ESTABLISHMENT NO. AND NAME

10/09/01

Est. 193  
Hendrix Meat Group C.V.

CITY  
Meppel

COUNTRY  
Netherlands

NAME OF REVIEWER  
Dr. Faiz R. Choudry

NAME OF FOREIGN OFFICIAL  
Dr. Ron Dwinger, Staff Officer

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 U	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 U	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 U	Effective maintenance program	33 A	Processing schedules	61 O
Establishments separation	06 A	Preoperational sanitation	34 M	Processing equipment	62 O
Pest --no evidence	07 A	Operational sanitation	35 M	Processing records	63 O
Pest control program	08 A	Waste disposal	36 A	Empty can inspection	64 O
Pest control monitoring	09 A	2. DISEASE CONTROL		Filling procedures	65 O
Temperature control	10 A	Animal identification	37 A	Container closure exam	66 O
Lighting	11 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 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 M	Residue program compliance	46 A	Single standard	75 A
Other product areas (inside)	20 A	Sampling procedures	47 A	Inspection supervision	76 M
Dry storage areas	21 A	Residue reporting procedures	48 A	Control of security items	77 A
Antemortem facilities	22 A	Approval of chemicals, etc.	49 A	Shipment security	78 A
Welfare facilities	23 A	Storage and use of chemicals	50 A	Species verification	79 A
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 O	HACCP	82 U
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
	10/09/01	Est. 193 Hendrix Meat Group C.V.	Meppel
			COUNTRY
			Netherlands
NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL	EVALUATION	
Dr. Faiz R. Choudry	Dr. Ron Dwinger, Staff Officer	<input type="checkbox"/> Acceptable <input checked="" type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable	

COMMENTS:

05. Numerous sanitizers were not maintained at the required temperature (82C) in the boning room. Neither establishment nor GON inspection officials took corrective action.

19. Dirt, black discoloration, and old fat residue were observed on employees' scabbards and knives in the slaughter and boning rooms. Neither establishment nor GON inspection officials took corrective action.

28. a) Hog carcasses were contacting work platforms, stands, and employees' boots in the slaughter.

b) Automatic viscera conveyor was not sanitized in the slaughter room. Neither establishment nor GON inspection officials took corrective action.

31. Product that contacted the floor was not reconditioned in a sanitary manner before being added to the edible product such as several pieces of meat with dirt and abscesses were collected in the same container and were not trimmed in a sanitary manner in the boning room. Establishment officials ordered correction.

34, 35.a) The daily pre-operational and operational sanitation deficiencies most of the times were not identified and any corrective action taken were not documented by the establishment personnel; b) GON inspection officials were identifying the pre-operational and operational sanitation deficiencies and any corrective actions taken were not being maintained.

76. Monthly supervisory visits were not conducted. Only two internal reviews were made per year.

82. FSIS basic regulatory requirements of HACCP program were not met (please see attachment F).

**FOREIGN PLANT REVIEW FORM**

REVIEW DATE  
10/11/01

ESTABLISHMENT NO. AND NAME  
Est. 242  
Boom Fine Food Manufacturers B. V.

CITY  
Putten  
COUNTRY  
Netherlands

NAME OF REVIEWER  
Dr. Faiz R. Choudry

NAME OF FOREIGN OFFICIAL  
Dr. Ron Dwinger & Dr. Harmsen, Distt. Auditor

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 M	Processing equipment	62 A
Pest --no evidence	07 A	Operational sanitation	35 M	Processing records	63 A
Pest control program	08 A	Waste disposal	36 A	Empty can inspection	64 A
Pest control monitoring	09 A	2. DISEASE CONTROL		Filling procedures	65 A
Temperature control	10 A	Animal identification	37 O	Container closure exam	66 A
Lighting	11 A	Antemortem inspec. procedures	38 O	Interim container handling	67 A
Operations work space	12 A	Antemortem dispositions	39 O	Post-processing handling	68 A
Inspector work space	13 O	Humane Slaughter	40 O	Incubation procedures	69 A
Ventilation	14 A	Postmortem inspec. procedures	41 O	Process. defect actions -- plant	70 A
Facilities approval	15 A	Postmortem dispositions	42 O	Processing control -- inspection	71 A
Equipment approval	16 A	Condemned product control	43 O	5. COMPLIANCE/ECON. FRAUD CONTROL	
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control	44 O	Export product identification	72 A
Over-product ceilings	17 A	Returned and rework product	45 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 M
Dry storage areas	21 A	Residue reporting procedures	48 O	Control of security items	77 A
Antemortem facilities	22 O	Approval of chemicals, etc.	49 A	Shipment security	78 A
Welfare facilities	23 A	Storage and use of chemicals	50 A	Species verification	79 A
Outside premises	24 A	4. PROCESSED PRODUCT CONTROL		"Equal to" status	80 A
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim	51 O	Imports	81 A
Personal dress and habits	25 A	Boneless meat reinspection	52 O	HACCP	82 U
Personal hygiene practices	26 A	Ingredients identification	53 A		
Sanitary dressing procedures	27 O	Control of restricted ingredients	54 A		

<b>FOREIGN PLANT REVIEW FORM</b> (reverse)	REVIEW DATE	ESTABLISHMENT NO. AND NAME	CITY
	10/11/01	Est. 242 Boom Fine Food Manufacturers B. V.	Putten
			COUNTRY
			Netherlands
NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL		EVALUATION
Dr. Faiz R. Choudry	Dr. Ron Dwinger & Dr. Harmsen, Distt. Auditor		<input type="checkbox"/> Acceptable <input checked="" type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable

COMMENTS:

34, 35. a) GON inspection officials were not verifying the adequacy and effectiveness of daily pre-operational and operational sanitation.

b) GON Inspection officials were not providing adequate daily inspection coverage. Only inspector was visiting this establishment 4 times a year or whenever products were produced for export.

76. Monthly supervisory visits were not conducted. Only two internal reviews were made per year.

82. FSIS basic regulatory requirements of HACCP program were not met (please see attachment F).

**FOREIGN PLANT REVIEW FORM**

REVIEW DATE: 12/12/01  
ESTABLISHMENT NO. AND NAME: Est. 378  
Dumeco Helmond B.V.

CITY: Helmond  
COUNTRY: Netherlands

NAME OF REVIEWER  
Dr. Faiz R. Choudry

NAME OF FOREIGN OFFICIAL  
Dr. R. Dwinger; Dr. Peelen, R/D & Dr. Hellwig

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 U	Packaging materials	56 A
Water potability records	01 A	Product handling and storage	30 M	Laboratory confirmation	57 O
Chlorination procedures	02 A	Product reconditioning	31 U	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 M	Effective maintenance program	33 A	Processing schedules	61 O
Establishments separation	06 A	Preoperational sanitation	34 M	Processing equipment	62 O
Pest --no evidence	07 A	Operational sanitation	35 M	Processing records	63 O
Pest control program	08 A	Waste disposal	36 A	Empty can inspection	64 O
Pest control monitoring	09 A	2. DISEASE CONTROL		Filling procedures	65 O
Temperature control	10 A	Animal identification	37 A	Container closure exam	66 O
Lighting	11 M	Antemortem inspec. procedures	38 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 M	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 M	5. COMPLIANCE/ECON. FRAUD CONTROL	
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control	44 A	Export product identification	72 A
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Dry storage areas	21 A	Residue reporting procedures	48 A	Control of security items	77 A
Antemortem facilities	22 A	Approval of chemicals, etc.	49 A	Shipment security	78 A
Welfare facilities	23 A	Storage and use of chemicals	50 A	Species verification	79 A
Outside premises	24 A	4. PROCESSED PRODUCT CONTROL		"Equal to" status	80 A
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim	51 A	Imports	81 O
Personal dress and habits	25 A	Boneless meat reinspection	52 A	HACCP	82 U
Personal hygiene practices	26 U	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
	12/12/01	Est. 378 Dumeco Helmond B.V.	Helmond
			COUNTRY
			Netherlands
NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL	EVALUATION	
Dr. Faiz R. Choudry	Dr. R. Dwinger; Dr. Peelen, R/D & Dr. Hellwig	<input type="checkbox"/> Acceptable <input checked="" type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable	

COMMENTS:

5. There was no sanitizing facility for carcass circular saw to sanitize when contaminated in the primal parts cut-up room. Establishment officials ordered correction.
11. Light was inadequate at the head and viscera inspection stations.
19. a) Dried pieces of meat, blood, and fat were observed on containers for edible product in the boning room.  
b) Fat, grease, and black discoloration was observed on meat hooks. Establishment officials ordered corrections.
26. Several employee's were not using hygienic work habits to prevent product contamination such as: Employees' handling unclean equipment were also handling edible product without washing hands or sanitizing knives; Employees' crossing over unprotected edible product conveyor belts; Employees' handling inedible product and also were handling edible product without washing hands in between in the boning room. Neither establishment nor GON inspection officials took corrective action.
28. Hog carcasses were contacting work platforms and employees' boots at the carcass trimming in the slaughter. Establishment officials ordered correction.
- 29.a) Container to move dropped carcasses was not sanitized between each use in the slaughter room. There was no sanitizing facility in the area. Establishment officials ordered correction.  
b) Employees' were not washing/sanitizing knives between jowls trimming when contaminated with abscess in the boning room. Neither establishment nor GON inspection officials took corrective action.
31. Product that contacted the floor was not reconditioned in a sanitary manner before being added to the edible product such as dirt/contamination was scrapped with knife and singered instead of trimming; An employee was observed picking-up dropped meat from the floor and rehanged on the rack for edible product without reconditioning. Establishment officials took corrective action immediately.
- 34, 35.a) The daily pre-operational and operational sanitation deficiencies were not identified and any corrective action taken were not documented by the establishment personnel.  
b) GON inspection officials were not identifying the pre-operational and operational sanitation deficiencies and any corrective actions taken were not documented.
- 41.a) Inspector was not incising and observing properly mandibular lymph nodes of hog heads. Liver, lungs, and mesenteric lymph nodes were not palpated by the inspector as required in Council Directive 64/433/EEC of 26 June 1964. GON inspection officials did not take any corrective actions.  
b) Inspector did not retain the viscera and offal for the hog carcass dropped on the floor before the inspection station to co-relate post-mortem inspection with hog carcass. Inspector passed the carcass without co-relation of viscera.
43. Containers for edible and inedible product were not identified in the boning room.
76. Monthly supervisory visits were not conducted. Only two internal reviews were made per year.
82. FSIS basic regulatory requirements of HACCP program were not met (please see attachment F).

United States Department of Agriculture  
 Food Safety and Inspection Service  
 Dr. Sally Stratmoen  
 Chief Equivalence Section  
 International Policy Staff  
 Washington, D.C. 20251



landbouw, natuurbeheer  
 en visserij

FAX: 011.202.720.7990

Your letter of	your reference	our reference	date
JAN 17 2002		VVA/02.926/18	MARCH 14 2002
re:		extension no.	enclosures
FSIS Inspection		+31-70-3785399	

Dear Dr Stratmoen,

**Introduction**

Herewith the Dutch response to the draft final audit report, concerning an on-site audit of the Dutch meat inspection system performed by the Food Safety and Inspection Service. This audit, carried out by Dr. Choudry, took place from 1 to 24 October 2001. On 24 October there was a closing discussion between the inspector, representatives of the Dutch government and a representative of the European Commission. A copy of this response, together with the draft report, will be sent to the European Commission. I received your draft report on 17 January 2002. On 12 February we discussed the report on the telephone. We then confirmed that we would respond within 60 days of receipt of the report. This written response conforms with what we proposed on 12 February.

**General**

In general I would comment that the draft report takes a very negative tone, which I do not consider appropriate. The Dutch meat inspection system is of high quality, meets internationally accepted standards and guarantees safe production of meat. I do not think this is adequately reflected in the report.

Several references are made in the report to minor shortcomings in such a generalised way as to give an incorrect impression that they are commonplace. I would request that you correct this impression. This applies to a greater extent to the comments made concerning Classical Swine Fever; you are aware that the Dutch pig stock, following the epidemic of '97-'98, and again since the summer of 1998 is free of Classical Swine Fever in accordance with internationally accepted standards (OIE).

As a last general point I would note that matters treated in this report as being unsatisfactory, such as HACCP, SSOP, and the RWV laboratory, were found to be in order during the previous audit. I attribute this to a different interest and approach on the part of the auditor; I consider this lack of uniformity undesirable.

**Clarifications with regard to the draft report**

Please see below a number of clarifications which can be used to correct and revalue the report.

Ministry of Agriculture,  
 Nature Management and  
 Fisheries  
 Voeding, en Veterinaire  
 Aangelegenheden  
 Veterinaire Handel en  
 Controle  
 Bezuidenhoutseweg 73  
 Postal Address: 20401  
 2500 EK DEN HAAG  
 Telephone: 070-3785399  
 Fax: 070-3786142  
 Telegram Address: Landvis  
 32040 Lavint

IPS/643  
 RWV 3/19/02

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- Classical Swine fever does not occur in the Netherlands. The Dutch pig stock has been free from classical swine fever in accordance with the internationally accepted standards of the OIE since the summer of 1998 (see pp. 1 and 11).
- Following the names of Dr. Luuk van Duijn, Dr. Ate Jelsma, Dr. Ron Dwinger and Dr. Henk Keukens 'LNV' should be replaced by 'RVV' (see pp. 4 and 18).
- The abbreviation of the RVV laboratory is LRVV (see p.8).
- Under the heading "reporting positive results" on page 12, the correct procedure is as follows: If animal samples are found to be positive, the AID launches an investigation into the cause. Animals from which positive samples are taken are seized and destroyed. In the case of illegal growth promoters additional sampling must be carried out. The number of animals to be sampled equals the root +1 of the number of animals present. If positive samples are subsequently detected in one or more animals, all the animals present on the holding must be sampled. Only those animals from which positive samples are taken are destroyed. Fines can be imposed as a penalty (see p. 12).
- For the testing of carcasses for the presence of *Salmonella*, the sponge method, and not the cork bore method, is used in the targeted and screening analysis (instructions RE-29 and RE-30) (see page 16).
- At the meeting in Brussels it was not Dr. Willem Droppers who was present, but Dr. Star van der Meljs, Veterinary Board, at the Dutch Embassy for the EU in Brussels (see page 19).
- The methods used in the Netherlands in the inspection of calves of up to six months of age, were already explained in detail in a letter to the FSIS of 4 January 2001, ref. VVM004060/RF.
- Microbiological tests on ready-to-use products for *Salmonella* and *Listeria* are carried out annually by the RIVM. This was also explained at length in the letter to the FSIS of 4 January 2001, ref. VVM004060/RF. In an extra letter, which I will send you the coming days, I shall provide you with information about the amount of ready-to-use products which were tested for *Salmonella* and *Listeria* in 2001.
- In laboratory testing of residues in cattle the *State Institute for Quality Control of Agricultural Products* (RIKILT) and the *RVV Laboratory* (LRVV) test various types of control samples for each method, ranging from blank sample, through samples with additive to certified reference samples (trace elements). However, there are no suitable reference materials available for very many of the components stipulated in the National Plan. In other situations it is impossible to prepare control samples which are sufficiently stable to test a method over a sustained period. It is thus impossible to follow the same system for all components when setting up a secure system. Even the FAPAS organisation, which offers proficiency testing within Europe for securing investigation methods has only a limited range in the field of residues of growth promoters and veterinary medicines.
- In the Netherlands the laboratories impose requirements for all quantitative analysis methods for the recovery for the samples with additive analysed within the series. These requirements are set down in the method of analysis and it also specifies what action is required if there is an aberrant result within a series. If a method is used whereby deuterated internal standards are added to every sample, then often only a single requirement is set for the minimum traceable percentage to reach the desired limit of quantification. This last approach is used specifically for the determination of illegal growth promoters using GC-MS and LC-MS. Unique identifica-

Date	Reference	Following page
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tion in accordance with EU criteria at the level of the MRPL (minimum required performance level) is in that case more important than measuring the exact concentration. Laboratory samples taken from animals to be analysed for the presence of residues of unauthorised substances are usually analysed within 72 hours. Samples taken in the slaughter phase are frozen after receipt at -18 °C until the time of analysis. This analysis will be completed within a period of 6 to 13 weeks. For a number of components (OCs, PCBs, heavy metals) keeping samples for a long time does not present problems. For critical components (antibiotics, organophosphorous compounds) samples are only kept for a short time (from 4 to a maximum of 6 weeks).

#### Adjustments to the Dutch system in response to the FSIS audit

As already mentioned in the introduction, the recent audit was the first to examine the Dutch HACCP and SSOP methodology in such specific detail. In the teleconference we discussed the fact that it would have been more scrupulous to have announced this in advance. On the other hand, we must admit in all fairness that we found a number of your inspector's comments extremely useful. This will assist the Netherlands, and possibly also the EU, in the further development of the systems in question. In fact we will implement the following adjustments.

- If meat production companies are producing for the US they will be subject to daily inspections by the RVV, even where there is a second and third shift working in a multi-shift system. If meat production companies are not producing for the US, inspections may be less frequent.
- Once per month the team leader (or another RVV supervisor) will visit the responsible veterinary practitioner and inspect part of the company's operations (e.g. pre-operational sanitation procedures or operational sanitation, a CCP, another aspect of the HACCP, work in the cutting line, etc.).
- The companies will adapt their HACCP systems (clear description of the risk analysis, validation of the HACCP by third parties and meticulous description, monitoring, correction and verification of CCPs). The RVV will run weekly checks on the implementation of the HACCP. The verification consists of three parts: physical checks, monitoring of company official controlling the CCPs, documentary checks of the reports and corrective actions.
- The RVV will carry out daily checks (verification) on the "pre-operational sanitation" (cleaning before work begins) and "operational sanitation" (cleanliness during work) in the slaughter and cutting processes. The verification consists of several parts: first verifying whether the company has carried out the checks and completed the operational checklists and secondly whether one's own findings, following checks with the aid of a company checklist of various parts of the business, corresponds to the findings of the company itself, and finally whether corrective measures have been effectively implemented. Checks on meat product companies can be less frequent, but still more often than once per month.
- RVV officials must supervise the maintenance of zero tolerance and the prevention of product contamination (for example by paying attention to cleaning the intestine conveyor belt with water at 82°C, cleaning and decontamination of the sticking knife after bleeding of each pig, adapting the procedure and the application of the treatment of meat which has fallen on the floor). Immediate action is required whenever faecal contamination is found.

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- The inspection regulations must be followed meticulously. The following points merit special attention:
  - ⇒ cutting into the Masseter muscle of calves (do not cut through the aponeurosis but through the muscle);
  - ⇒ cutting into the mandibular lymph glands of pigs and calves;
  - ⇒ palpation of liver in pigs and calves and lungs in calves;
  - ⇒ palpation of lungs in pigs (if intended for human consumption);
  - ⇒ palpation of lymph glands of liver and lungs in pigs.
- The companies will institute a "pre-shipment" check of the CCPs (last documentary control before the product leaves the company premises). The RVV must monitor the procedure, implementation and reporting
- When sampling carcasses the samples must be taken randomly. The industry will develop a procedure to guarantee this. The RVV official can use this procedure or develop his or her own procedure.
- The RVV official (and not the industry) will take the samples for the monitoring of meat products intended for export to the USA. Checks will be made to ensure that the animal species stated on the label corresponds to the animal species in the product.
- The RVV laboratory in Wageningen will direct the targeted and screening analysis for *Salmonella*. The same laboratory will also direct the verification analysis for faecal contamination.
- In the laboratory analysis for residues, the RIKILT can make greater use than hitherto of unknown check samples for testing the analysis process. This relates particularly to testing by other inspection institutions active in a similar field and with which there is periodic consultation.
- Results of control samples and recovery experiments must be accurately established by the RVV laboratory and by RIKILT and follow up actions arising from the identified aberrations will be recorded.
- RIKILT and the RVV laboratory will each use a uniform system for the management and registration of the use or creation of reference standards for residue analysis.
- RIKILT will carry out the analyses of residues in samples of animal origin within a storage time limit, which is known not to affect the original residue concentration. The storage time limit of samples for analysis for organophosphorous compounds will be no longer than 6 weeks.

I assure that you will refer to the factual inaccuracies in your final report and that you will report our other findings in an accompanying letter. I look forward to our continued collaboration with interest.

Yours sincerely,



Dr. Frits Plummers  
Chief Veterinary Officer