



United States
Department of
Agriculture

Food Safety
and Inspection
Service

Washington, D.C.
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Dr. Frits H. Pluimers
Chief Veterinary Officer
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Room 4205
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The Netherlands

MAY 29 2001

Dear Dr. Pluimers:

The Food Safety and Inspection Service conducted an on-site audit of the Netherlands' meat inspection system from February 10 through 28, 2000. Enclosed is a copy of the final audit report. The Netherlands' comments on the draft final audit report have been included as an attachment to the enclosed final audit report. Please accept our apologies for the delay in completing this report.

If you have any questions regarding the audit or need additional information, please contact Ms. Sally Stratmoen, Chief of Equivalence, International Policy Division. Her telephone number is (202) 720-3781 and her fax number is (202) 690-4040. She can also be reached by email at sally.stratmoen@usda.gov.

Sincerely,

RS/ Richard Brown

Richard F. Brown, Acting Chief
Equivalence Section
International Policy Division
Office of Policy, Program Development
and Evaluation

Enclosure



AUDIT REPORT FOR NETHERLANDS

FEBRUARY 10 THROUGH FEBRUARY 28, 2000

INTRODUCTION

Background

This report reflects information that was obtained during an audit of Netherlands Inspection Service for Livestock and Meat (RVV) system from February 10 through February 28, 2000. Eight of the 30 establishments certified to export meat to the United States were audited. Three of these were slaughter establishments; the others were conducting processing operations.

The last on-site audit of Netherlands inspection system was conducted in January 1999. Twenty-two establishments were audited: 19 were acceptable, and three were unacceptable (Est. 49, 189, and 410). The issues of concern for deficiencies at the time of the previous 1999 audit were:

1. Company-paid inspectors performed inspection procedures.
2. In 12 of 14 establishments audited, the postmortem inspection was incomplete. Postmortem inspection procedures for large calves, skinned calves and hogs were in variance, and did not meet U.S. requirements.
3. Boneless meat inspection was not done.
4. Dead on arrival (DOA) carcasses and condemned/inedible product was not denatured or decharacterized.
5. Processed product and freezer warehouse establishments were not required (RVV) to develop SSOPs. However, the establishments visited had prepared SSOPs as a part of QA-ISO 9000/HACCP plans. The establishments checked off deficiencies, but failed to document actual deficiencies and/or the corrective actions taken. Two warehouse/freezers audited did not conduct daily pre-operational and sanitation. Three establishments did not identify, prevent, or control direct product contamination during the audit, and were delisted.
6. Fecal contamination indicator is determined by testing *Enterobacteriaceae* and aerobic plate counts in lieu of generic *E. coli* testing (equivalent procedures). Of the 14 slaughter establishments audited, one did not conduct testing; six did not collect samples randomly; eight failed to collect samples at required frequency; two collected frozen samples from variable sites; and six collected samples from 3-sites. The results were not charted or graphed using the 13 most recent sample results for process control. When maximum limits were exceeded, the establishments failed to document the process control and the corrective actions taken.
7. RVV did not mandate HACCP implementation in slaughter establishments and processed products, however, HACCP plans in 19 establishments were incomplete and/or being developed; in three establishments the plans were not developed; and in three establishments HACCP plans were available but not implemented. The establishments failed to record actual values and problems pertaining to process control and/or how the

processes were brought under control. The establishments also did not perform annual reassessment of the plans.

8. *Salmonella* species sampling and testing procedures did not meet FSIS requirements.
9. The government of the Netherlands does not perform species verification testing.

Except for the inadequate and incomplete large calves postmortem inspection procedures which do not comply with FSIS and EU procedures, failure to denature/decharacterize dead on arrival (DOA) carcasses, condemned/ and inedible products, failure to monitor arsenic residues in meat product, and species verification testing, all serious deficiencies cited above were corrected.

Product prepared from beef of Netherlands origin is not eligible for export to U.S. due to *bovine spongiform encephalopathy* (BSE). The pork product import is also restricted, and shall be cooked to internal temperature of 69° C due to hog cholera.

During the calendar year 1999, Netherlands establishments exported 12,299,985 pounds of canned hams, picnics, luncheon meats, chopped ham, and sausages to the United States. Port-of-entry rejections were 0.007% for pathological defects, and shipping marks.

PROTOCOL

The on-site review was conducted in four parts. One part involved visits with various Netherlands' 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. Sixteen U.S.-certified establishments were selected randomly for records. Of these, eight were pre-selected for on-site establishment visits. The third part was conducted by on-site visits to establishments. The fourth was a visit to two official laboratories performing analytical testing of samples for the national residue and microbiological monitoring program, and one private laboratory performing testing microbiological samples.

Program effectiveness determination focused on five areas of risk: (1) sanitation controls, including the implementation and operation of Sanitation Standard Operating Procedures (SSOPs), (2) animal disease controls, (3) residue controls, (4) slaughter/processing controls, including the implementation 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. The Netherlands' inspection system was assessed by evaluating these five risk areas.

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

RESULTS AND DISCUSSION

Summary

Based on the performance of the individual establishments, the Netherlands' "In-Plant Inspection System Performance" was evaluated as In-Plant System Controls in Place.

Effective inspection system controls were found to be in place at the time of on-site audits of establishments visited. However, the following serious inspection control deficiencies were noted following document audits, discussions with RVV, establishments, and laboratory officials/representatives:

- Continuous and direct (in-plant) inspection coverage in processed meat product and warehouse/freezer facilities was not being provided daily. Inspectors routinely visited these establishments at 4-weekly intervals and/or more frequently if necessary. Inspection coverage was also not provided during second or third shift operation establishments.
- Supervisory officials routinely do not conduct monthly in-depth reviews of the establishments. The details are discussed in the text.
- There is no official oversight of private laboratories.
- Monitoring for arsenic was not done in 1999. It was stated that arsenic testing 'surveillance' sampling would be included in the CY 2000 residue-testing program.
- All slaughter establishments visited had implemented PR/HACCP systems. The evaluation standard for aerobic colony counts in conjunction with *Enterobacteriaceae* values as a fecal contamination indicator standards requiring 'immediate corrective action' and 'corrective action' were lowered. The change is discussed under 'Testing for *Enterobacteriaceae* in lieu of *E. coli*'.
- *Salmonella* species testing (FSIS recognized-equivalent procedure) was started in 9 of 12 currently U.S.-certified slaughter establishments in May 1999. On 1st and 2nd set-samples results (failing to meet performance standards), further testing was put on hold until March 2000. The details are discussed under 'Testing for *Salmonella* spp.' These changes, it was learned, had not been communicated to FSIS, IPD due to an oversight.
- 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. However, the ready-to-eat products are periodically sampled by the establishments, and tested for *Salmonella* and *Listeria monocytogenes* in private accredited laboratories.

- Previously reported deficiencies for large calf's postmortem inspection procedure, and control of DOA carcasses, and condemned/inedible product by denaturing/decharacterization were not corrected.
- The Netherlands is not exempt from official species verification, and the establishment testing for species verification does not comply with FSIS requirements. This was a repeat deficiency.

Entrance Meeting

On February 10, an entrance meeting was held at Voorburgh at the RVV offices and was attended by J. van den Berg, Deputy Director RVV, Dr. M. Weijtens (VVM), Dr. A. Hom (WGA), and Ing. L. v. Duijn, Head RV Inspection Program, Dr. W.A.M. Jansen (RVV), Ing. G. Corstiaensen (meat industry representative), Mr. Chris Langezaal, FAS/U.S. Embassy, and Dr. Hussain Magsi, International Audit Staff Officer, FSIS. Topics of discussion included:

1. Animal health status.
2. Residue and microbiological monitoring.
3. Official oversight and enforcement
4. Consumer complaints and port of entry rejections.
5. Previous audit issues stated above.
6. Understanding of FSIS 'delistment and relistment' of establishments policy.

Headquarters Audit

As of January 2000, RVV has been reorganized. Mr. P. Cloo is the new RVV Director and Dr. J. van den Berg is the RVV Deputy Director.

To gain an accurate overview of the effectiveness of inspection controls, FSIS requested that the audits of the individual establishments be lead 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 the inspection system documents pertaining to the establishments listed for records review. This records review was conducted at RVV headquarters. The records review focused primarily on food safety hazards and included the following:

- Internal review reports.
- Supervisory visits to the establishments that were certified to the U.S.
- Label approval records such as generic labels.
- New laws and implementation documents such as regulations, notices, directives, and guidelines.
- Sampling and laboratory analyses for residues.

- Pathogen reduction and other food safety initiatives such as SSOPs, HACCP programs generic *E. coli* testing, and *Salmonella* testing.
- Sanitation, slaughter and processing inspection procedures and standards.
- Control of products from livestock with conditions such as tuberculosis, cysticercosis, etc., and of inedible and condemned materials.
- Export product inspection and control 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.

Some of the concerns noted as a result of the examination of these documents have been discussed in the text.

Government Oversight

All inspection veterinarians and food inspectors in establishments certified by the Netherlands as eligible to export meat product to the United States were full-time or part-time employees, receiving no remuneration from either industry or establishment personnel. However, the inspection coverage was inadequate in certain situations discussed under 'Laboratory Audits', 'Animal Disease Controls', 'Residue Controls', 'Inspection System Controls', 'Testing for *Listeria monocytogenes*', 'Species Verification Testing', and 'Monthly Reviews'.

Establishment Audits

Thirty establishments were certified to export meat products to the United States at the time this audit was conducted. Eight establishments were visited for on-site audits. In all eight establishments visited, both RVV inspection system controls and establishment system controls were in place, to prevent, detect and control contamination and adulteration of the product.

Laboratory Audits

The auditor visited two official laboratories and one private laboratory. The official laboratories visited were Central RVV Laboratory (CLRVV) in Wageningen and a regional DLRVV Laboratory in Assen, and the private laboratory was CCL in Veghel. The official laboratories are operated with public funds.

- Official Laboratories. The CLRVV develops and monitors 'National Plan for Residues in Live Animals and Animal Products' according to European Union (EU) mandated plan for specified substances. While developing an EU directed program, the laboratory also takes into account the nationally mandated and other clients (importing country) requirements. It analyzes hormones, veterinary drugs, and beta-agonistic compounds.

- The analyses of other required substances is shared by five official regional DLRVV laboratories located in Almelo, Amsterdam, Assen, Wageningen, and Weert. In addition, the laboratories perform routine microbiological testing for samples received from slaughterhouse inspectors. The DLRVV in Assen plans and conducts U.S.-required *Salmonella* species testing.
- Private Laboratories. In addition to Rikilt (DLO) Laboratory (national reference laboratory), there are several other private laboratories. Thirteen of the other private laboratories conduct meat and poultry analyses for several compounds and microorganisms, including *Enterobacteriaceae*, *Listeria*, *Salmonella*, microorganisms, and/or water. CLRVV contracts DLO to conduct testing for surveillance targeted compounds, environmental contaminants, and prohibited compounds.

During the laboratory audits, the emphasis was placed on the application of procedures and standards that were equivalent to the U.S. requirements. Information was collected on (1) government oversight of the accredited, approved, and private laboratories stated above, (2) inter-laboratory quality assurance procedures, including sample handling, and (3) methodology. The auditor also applied the following criteria established for use of private laboratories under FSIS's Pathogen Reduction/HACCP rule and evaluated laboratory system's performance.

The auditor determined that:

- A national accrediting body 'STERLAB' accredited all laboratories in the Netherlands. The STERLAB is accepted by the European Cooperative Accreditation (EA) multilateral agreement on mutual recognition of accredited bodies. The EN 45000.1 operational standards served as the basis for their work with ISO guidelines.
- The accredited private labs periodically consulted with RVV, and participated in national accreditation (STERLAB) deliberations. However, there was no oversight by RVV on private laboratories.
- In general, the laboratories followed accredited laboratory assurance programs, and demonstrated effective controls for sample handling, timely analysis, data reporting, tissue matrices for analysis, equipment maintenance and operations and printouts, minimum detection levels, recovery frequency, percent recoveries, sample compositing, and corrective actions. The methods used for analyses were standard or in line with EN 4500.1 guidelines.

Establishment Operations by Establishment Number

The following operations were being conducted in the establishments visited:

- Canned hams, and sausages (Est. 19)
- Pork slaughters, and cut up (Est. 27, 193)
- Pork cut up, and bacon processing (Est. 98)
- Pork cut up (Est. 124)
- Canned hams, and cocktail sausages (Est. 139)
- Calf slaughters, and cut up (Est. 369)
- Freezer/warehouse, packaging (Est. 451)

SANITATION CONTROLS

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

Sanitation Standard Operating Procedures (SSOPs)

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

The SSOPs were found to meet the basic regulatory requirements.

ANIMAL DISEASE CONTROLS

With the exception listed below, the Netherlands inspection system had controls in place to ensure adequate animal identification, ante-mortem and post-mortem inspection procedures (swine) and disposition, and procedures for sanitary handling of returned and rework product.

1. The large calf postmortem inspection procedures did not meet U.S. requirements. The procedures were unchanged from those observed during previous audit in Netherlands. This is a repeat system deficiency.

During 1999 bovine tuberculosis (one case), *bovine spongiform ecephalopathy* (two cases), and bovine cysticercosis (prevalent – data not available) were reported by RVV. At the time of audit, information was not readily available on measures taken (animal trace back, animal ID, etc.) on the epidemiology.

RESIDUE CONTROLS

The Netherlands National Residue Testing Plan for 1999 was being followed. The CY 2000 program would be started in March 2000. The inspection system had adequate controls in place to ensure compliance and reporting procedures and storage and use of chemicals.

SLAUGHTER/PROCESSING CONTROLS

The Netherlands inspection system had adequate controls in place to ensure humane slaughter, and adequate product safety.

HACCP Implementation

All establishments approved to export meat products to the U.S. were 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 instruments used accompanies this report (Attachment B).

The HACCP programs were found to meet the basic FSIS regulatory requirements.

Testing for *Enterobacteriaceae* in lieu of *E. coli*

The testing is being done according to FSIS recognized-*E. coli* testing equivalent *Enterobacteriaceae* testing program, which addresses sample collector, testing laboratories, indicator microorganisms, testing strategy, sampling sites, sampling tools, and analytical methods. The aerobic colony counts for pork carcasses used as “and, and/or” parameters, in conjunction with *Enterobacteriaceae* values as fecal contamination indicator were changed from average in log N/cm² 3.4 to N/cm² 4.0 for ‘Class I Action (requiring no immediate corrective action)’, and average in log N/cm² >3.4 to N/cm² > 4.0 for ‘Class II Action (requiring repeat hygienic measurement and/or action)’. This was a significant change. Data justifying these changes was not readily available and/or offered for audit.

All establishments at the time of audit demonstrated an adequate control 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, the RVV’s inspection system controls for swine ante-and post-mortem inspection procedures and dispositions, boneless meat reinspection, shipment security, including shipment between establishments, prevention of commingling of product intended for export to the United States with domestic product, monitoring and verification of establishment programs and controls (including the taking and documentation of corrective actions under HACCP plans) were in place and were effective in ensuring that products produced by the establishments 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.

The following serious deficiencies were noted in all establishments:

- DOA condemned and inedible products were shipped off the premises without denaturing/ decharacterizing according to variable arrangements for shipping with the only rendering facility in Netherlands. These arrangements, the auditor determined, were not sufficiently reliable to ensure control of contaminated, adulterated, unsound or diseased carcasses or parts for being diverted to human supply food chain.
- Large calf postmortem inspection procedures are similar to small calf inspection. No change has been made to comply with U.S. requirements since previous FSIS visit.
- As a result of EU required HACCP-implementation in 1996/97, the inspection coverage/oversight frequency by official inspectors in EU and U.S.-certified establishments was reduced (except in slaughter operations) from daily to '4-week intervals'. Therefore continuous and direct inspection coverage, according for U.S. oversight procedures, in each operational shift is not provided in all establishments other than in slaughterhouses. Inspection and indepth monthly supervisory coverage required by FSIS is discussed under "Monthly Reviews".
- Lack of daily monitoring, and verification for SSOPs and HACCP implementation.in processed products, and warehouse/freezer facilities.

Testing for *Listeria monocytogenes*. In Establishments 19 and 129, which prepare ready-to-eat products, *Listeria monocytogenes* was not identified in their HACCP plans as a hazard likely to occur. Therefore, planned testing under HACCP is not done.

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. However, the ready-to-eat products are periodically sampled by the establishments, and tested for *Salmonella* and *Listeria monocytogenes* in private accredited laboratories.

Testing for *Salmonella* Species

The eight establishments audited were required to meet the basic FSIS regulatory requirements for *Salmonella*. Basic FSIS regulatory requirements were evaluated according to the criteria employed in 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.

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

The testing with FSIS recognized RVV-equivalent procedures for *Salmonella* were started in May 1999. Eight of 12 U.S.-certified establishments were included in the target plan. The *Salmonella* species test results were available in the establishments, and in the official Regional DRLVV laboratory in Assen. The samples were analyzed in Assen laboratory using ISO 6579, 3rd Edition method. The laboratory monitored the program.

The records audit results (as of 2/8/00) are summarized as below:

1. RVV Screening Program. Following initial screening eight establishments were included in the program in May 1999 at a frequency of monthly intervals. Six of 61 samples tested were positive. Other establishments were planned for screening in CY 2000.
2. RVV Target Program. The testing with FSIS recognized RVV-equivalent procedures for *Salmonella* were started in May 1999. Eight of 12 U.S.-certified establishments were included in the target plan.

One calf and three swine slaughter establishments failed to meet performance standards on completion of 1st set-series. Further testing was put on hold until March 2000.

Four swine slaughter establishments failed to meet performance standards, and took corrective actions, but failed 2nd test-series. Three of these reassessed their programs. Further testing was put on hold until March 2000.

It was stated that on completion of any of the series, starting March 6 (10th week), the sampling procedures would be changed to 'same as' U.S. sampling procedures (cork borer to sponging method).

Species Verification Testing

At the time of this audit, Netherlands was not exempt from the species verification-testing requirement and the auditor determined that species verification testing was not being done which does not comply with FSIS requirements. RVV did not sample or test for species identification. However, RVV monitors and verifies species identification sampling done by the establishments. Periodic samples were collected by the establishments, and analyzed by a government lab Rekilt-TNO.

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 during the export activity. The records of audited establishments were kept in the establishments 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, it is delisted for U.S. export. Before it may again qualify for eligibility to be reinstated, the responsible supervisory officials conduct an in-depth review and the results are reported to RVV headquarters. The supervisor(s) in conjunction with the inspector-in-charge formulate a plan for corrective actions and preventive measures. The slaughter establishments are under continuous inspection and are in-depth reviewed at least monthly. However, official RVV inspection coverage of processing and warehouse facilities include:

- Four-weekly audits: Assigned official patrol inspectors visit each establishment at 4-week intervals and verify the implementation of HACCP critical control points (CCPs). Second or third shift operations are not inspected.
- Quarterly audits: National Management HACCP Team member visits these establishments 4-times annually and conducts in-depth audit of facilities and equipment.
- Biannual audits: National Management HACCP Team members (one to three) visit these establishments twice a year and audit randomly selected operations/processes, establishments areas/equipment, and establishment HACCP records.
- 3-yearly audits: National Management HACCP Team members (two to four) visit these establishments at three-year intervals, in-depth audit HACCP and establishment system programs, operations, and records.
- Special audits: National Management HACCP Team member visits U.S.-certified establishments at FSIS required monthly intervals.
- The inspectors also visit establishments to certify exportation for all shipment to any country, whenever needed.

Enforcement Activities

RVV provided official directive dated March 6, 2000, which describes RVV's Quality Management Program. The Quality Management group is responsible for internal enforcement activities.

- Consumer Complaint. In response to a consumer complaint concerning adulteration of fully cooked ready-to-eat DAK ham exported by Establishment 129 with a 'pin'. The Regional *Inspectorate (Inspectie W & W)* for the Ministry of Health Protection, Commodities and Veterinary Public Health (responsible for compliance enforcement) carried out an investigation at the product origin (Est. 129). The establishment HACCP and other production records were audited/investigated. It was concluded that it was a probable accident; the source or actuality could neither be denied nor established.
- U.S. Port-of-entry Rejection. With respect to yellow-coloring adulteration of hams received in establishment 129, the RVV's special investigation and compliance group (*Inspectie V & V*) conducted an investigation and through lab analysis determined that the non-meat additives (cure-mix) was adulterated with a forbidden industrial Sudan/Yellow DYE (1-(phenylazo)-2-naphthalene). The product from the same batch was not available and could not be recalled or analyzed. The Ministry has not finalized the case.
- Labeling violation for cocktail sausage packed in brine was under investigation. The results were not available.

Exit Meetings

On February 23, an initial meeting was conducted in an establishment with Dr. J. van den Berg. An exit meeting was conducted in Voorburgh on February 28, 2000. The RVV participants were

Drs. Berg, Jansen, Dr. Ricjkert van der Flier (MVV), and other staff. Subjects of interest cited above were discussed.

Dr. Berg stated that RVV had initiated several actions to provide FSIS assurance with compliance enforcement. He stated that:

1. Calf slaughter postmortem inspection procedures were being discussed with EU. RVV would also consult the subject with FSIS.
2. Arsenic residue testing would be included in CY 2000 as in surveillance program
3. DOA carcasses condemned and inedible product handling procedures would be streamlined for uniform disposition. FSIS would be consulted.
4. The changes made on aerobic colony counts would be notified to FSIS, and that an oversight resulted in delayed communication.
5. FSIS required continuous inspection (daily inspection monitoring), and coverage of second third shift operations, including inspection coverage of processed products, and warehouse/freezer facilities at less than daily frequency was the result of EU-HACCP plan and negotiated agreement with the packers. It was also stated that the practice is being applied in all EU countries.

Dr. R. v. d. Flier stated that he would be travelling to visit FSIS, IPD staffs, and further discuss these and other issues.

CONCLUSION

The inspection system of the Netherlands was found to have effective controls to ensure that product destined for export to the United States was produced under conditions equivalent to those which FSIS requires in domestic establishments. Eight establishments were audited and all eight were acceptable. The deficiencies encountered during the on-site establishment audits were adequately addressed to the auditor's satisfaction. However, following serious deficiencies were observed:

- Reduced inspection control and establishment system monitoring/oversight from daily to monthly inspection visits in processed product and warehouse/freezer facilities and lack of second and third shift operation establishments inspection coverage is contrary to current FSIS regulations and policy.
- Required official supervisory in-depth audits are conducted.
- There is no official oversight of private laboratories.
- Monitoring for arsenic is not being monitored/tested.
- All slaughter establishments visited had implemented PR/HACCP systems. The evaluation standard for aerobic colony counts in conjunction with *Enterobacteriaceae* values as a fecal

contamination indicator standards requiring 'immediate corrective action' and /corrective action' were lowered. The change was not discussed with FSIS.

- *Salmonella* species testing (started in May 1999). Following 1st and 2nd set-samples results failing the performance standards, further testing was put on put hold until March 2000.
- 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.
- Previously reported deficiencies for large calf's postmortem inspection procedure, control of DOA carcasses, and condemned/inedible product by denaturing/decharacterization were not corrected.
- Verification sampling for species identification is not done by RVV. Netherlands is not exempt from official species verification. This is also a repeat deficiency.

(signed) Hussain Magsi, DVM, MS

Hussain Magsi, DVM, MS
International Audit Staff Officer

ATTACHMENTS

- A. Data collection instrument for SSOPs
- B. Data collection instrument for HACCP programs
- C. Data collection instrument for *Enterobacteriaceae* testing in lieu of generic *E. coli*.
- 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 the establishments visited on-site were evaluated 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
19	√	√	√	√	√	√	√	√
27	√	√	√	√	√	√	√	√
98	√	√	√	√	√	√	√	√
124	√	√	√	√	√	√	√	√
129	√	√	√	√	√	√	√	√
193	√	√	√	√	√	√	√	√
369	√	√	√	√	√	√	√	√
451	√	√	√	√	√	√	√	√

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

55	√	√	√	√	√	√	√	√
*82	√	√	√	√	√	√	√	√
153	√	√	√	√	√	√	√	√
*236	√	√	√	√	√	√	√	√
242	√	√	√	√	√	√	√	√
*378	√	√	√	√	√	√	√	√
505	√	√	√	√	√	√	√	√
515	√	√	√	√	√	√	√	√

*The establishment system documents were not presented by the companies at the headquarters due to 'company policy', and/or propriety reasons. The documents were audited at one their sister establishments.

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

The results of these evaluations were as follows:

Est. #	1. Flow diagram	2. Hazard analysis conducted	3. All hazards identified	4. Use & users included	5. Plan for each hazard	6. CCPs for all hazards	7. Monitoring is specified	8. Corr. actions are described	9. Plan validated	10. Adequate verific. procedures	11. Adequate documentation	12. Dated and signed
19	√	√	√	√	√	√	√	√	√	√	√	√
27	√	√	√	√	√	√	√	√	√	√	√	√
98	√	√	√	√	√	√	√	√	√	√	√	√
124	√	√	√	√	√	√	√	√	√	√	√	√
129	√	√	√	√	√	√	√	√	√	√	√	√
193	√	√	√	√	√	√	√	√	√	√	√	√
369	√	√	√	√	√	√	√	√	√	√	√	√
451	√	√	√	√	√	√	√	√	√	√	√	√

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

55	√	√	√	√	√	√	√	√
*82	√	√	√	√	√	√	√	√
153	√	√	√	√	√	√	√	√
*236	√	√	√	√	√	√	√	√
242	√	√	√	√	√	√	√	√
*378	√	√	√	√	√	√	√	√
505	√	√	√	√	√	√	√	√
515	√	√	√	√	√	√	√	√

*The establishment system documents were not presented by the companies at the headquarters due to 'company policy', and/or propriety reasons. The documents were audited at one of their sister establishments.

Data collection instruments for *Enterobacteriaceae* testing

Each establishment was evaluated to determine if *E. coli* or equivalent testing requirement were met according to the criteria employed in the U.S. domestic inspection program. However, the aerobic colony counts testing in conjunction with *Enterobacteriaceae* values as fecal contamination indicator were changed from log N/ cm² 3.4 to 4.0 for class I (requiring no immediate corrective action), and log N/ cm² > 3.4 to > 4.0 for class II (requiring a corrective action). It was stated that FSIS was not informed of the change due to an oversight.

Following information was collected.

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

Est. #	1. Written procedure	2. Sampler designated	3. Sampling location given	4. Predominant species sampled	5. Sampling at the req'd freq.	6. Proper site or method	7. Sampling is random	8. Using AOAC method	9. Chart or graph of results	10. Results are kept at least 1 yr
27	√	√	√	√	√	√	√	√	√	√
193	√	√	√	√	√	√	√	√	√	√
369	√	√	√	√	√	√	√	√	√	√

Data Collection instruments for *Salmonella* spp. Testing

Each slaughter establishment was evaluated to determine if the basic FSIS regulatory requirements for *Salmonella* testing were being 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) are 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	√	√	*
193	√	√	N/A	√	√	*
369	√	√	N/A	√	√	*

* *Salmonella* species testing (FSIS recognized-equivalent procedure) was started in 9 of 12 U.S.-certified slaughter establishments in May 1999. Testing was terminated in two establishments, which failed the 2nd test-series. Using 'same as' U.S. sampling procedures, on March 6, 2000 the sampling would be resumed in these and other establishments, which would have completed the first or second target (test-series) testing.

Attachment E

FOOD SAFETY AND INSPECTION SERVICE
INTERNATIONAL PROGRAMS

2-23-2000

NAME OF FOREIGN LAB. AGENCY

DLRVV LABORATY

FOREIGN COUNTRY LABORATORY REVIEW

FOREIGN GOV'T AGENCY RVV	CITY & COUNTRY ASSEN, NETHERLANDS	ADDRESS OF LABORATORY ASSEN
-----------------------------	--------------------------------------	--------------------------------

NAME OF REVIEWER DR. H. MAGSI	NAME OF FOREIGN OFFICIAL DRS. G.H. VEENSTRAIN, AND W.A.M. JANSEN
----------------------------------	---

Residue Code/Name		Sulf 800	Sal 5L	List L	AB 200									
SAMPLING PROCEDURES	REVIEW ITEMS	ITEM #	EVALUATION CODE											
	Sample Handling	01	A	A	A	A								
	Sampling Frequency	02	A	A	A	A								
	Timely Analyses	03	A	A	A	A								
	Compositing Procedure	04	O	O	O	O								
	Interpret Comp Data	05	O	O	O	O								
Data Reporting	06	A	A	A	A									
ANALYTICAL PROCEDURES	Acceptable Method	07	A	A	A	A								
	Correct Tissue(s)	08	A	A	A	A								
	Equipment Operation	09	A	A	A	A								
	Instrument Printouts	10	A	A	A	A								
QUALITY ASSURANCE PROCEDURES	Minimum Detection Levels	11	A	A	A	A								
	Recovery Frequency	12	A	A	A	A								
	Percent Recovery	13	A	O	O	A								
	Check Sample Frequency	14	A	A	A	A								
	All analyst w/Check Samples	15	A	A	A	A								
	Corrective Actions	16	A	A	A	A								
International Check Samples	17	A	A	A	A									
REVIEW PROCEDURES	Corrected Prior Deficiencies	18	A	A	A	A								
OTHER REVIEW		19												
		20												

SIGNATURE OF REVIEWER

DATE

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

REVIEW DATE
 2-14-2000

NAME OF FOREIGN LABORATORY
 CENTRAL RVV LABORATORY

FOREIGN COUNTRY LABORATORY REVIEW

FOREIGN GOV'T AGENCY
 RVV

CITY & COUNTRY
 WAGENINGEN,
 NETHERLANDS

ADDRESS OF LABORATORY
 WAGENINGEN

NAME OF REVIEWER
 DR. H. MAGSI

NAME OF FOREIGN OFFICIAL
 DRS. MARY SCHREURS, AND W.A.M. JANSEN

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

SIGNATURE OF REVIEWER

DATE

FOREIGN COUNTRY LABORATORY REVIEW

(Comment Sheet)

REVIEW DATE

2-14-2000

NAME OF FOREIGN LABORATORY

CENTRAL RVV LABORATORY

FOREIGN GOV'T AGENCY
RVV

CITY & COUNTRY
WAGENNINGEN,
NATHERLANDS

ADDRESS OF LABORATORY
WAGENINGEN

NAME OF REVIEWER
DR. H. MAGSI

NAME OF FOREIGN OFFICIAL
DRS. MARY SCHREURS, AND W.A.M. JANSEN

RESIDUE	ITEM	COMMENTS
400	1-18	MEAT PRODUCTS ARE NOT TESTED FOR ARSENIC RESIDUES.

FOREIGN PLANT REVIEW FORM

REVIEW DATE

2-24-2000

ESTABLISHMENT NO. AND NAME

EST. 19, HOMBURG B.V.

CITY
CUUIJK

COUNTRY
NETHERLANDS

NAME OF REVIEWER
DR. H. MAGSI

NAME OF FOREIGN OFFICIAL
DR. W.A.M. JANSEN

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 A
Hand washing facilities	04 A	(d) ESTABLISHMENT SANITATION PROGRAM		Inspector monitoring	60 A
Sanitizers	05 A	Effective maintenance program	33 A	Processing schedules	61 A
Establishments separation	06 A	Preoperational sanitation	34 A	Processing equipment	62 A
Pest --no evidence	07 A	Operational sanitation	35 A	Processing records	63 A
Pest control program	08 A	Waste disposal	36 A	Empty can inspection	64 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 A	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 U	5. COMPLIANCE/ECON. FRAUD CONTROL	
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control	44 O	Export product identification	72 A
Over-product ceilings	17 A	Returned and rework product	45 O	Inspector verification	73 A
Over-product equipment	18 A	3. RESIDUE CONTROL		Export certificates	74 A
Product contact equipment	19 A	Residue program compliance	46 O	Single standard	75 A
Other product areas (inside)	20 A	Sampling procedures	47 O	Inspection supervision	76 A
Dry storage areas	21 A	Residue reporting procedures	48 O	Control of security items	77 A
Antemortem facilities	22 O	Approval of chemicals, etc.	49 A	Shipment security	78 A
Welfare facilities	23 A	Storage and use of chemicals	50 A	Species verification	79 A
Outside premises	24 A	4. PROCESSED PRODUCT CONTROL		"Equal to" status	80 A
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim	51 A	Imports	81 (O)
Personal dress and habits	25 A	Boneless meat reinspection	52 A		
Personal hygiene practices	26 A	Ingredients identification	53 A		
Sanitary dressing procedures	27 O	Control of restricted ingredients	54 A		

FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE 2-24-2000	ESTABLISHMENT NO. AND NAME EST. 19, HOMBURG B.V.	CITY CUIJK COUNTRY NETHERLANDS
NAME OF REVIEWER DR. H. MAGSI	NAME OF FOREIGN OFFICIAL DR. W.A.M. JANSEN		EVALUATION <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable

COMMENTS:

43. CONDEMNED, AND/OR INEDIBLE PRODUCT IS NOT DENATURE/DECHARACTERIZED BEFORE OFF-PREMISES SHIPMENT.

FOREIGN PLANT REVIEW FORM

REVIEW DATE

2-27-2000

ESTABLISHMENT NO. AND NAME

EST. 27, STORKMEAT EINDHOVEN B.V.

CITY
SON EN ROPPEL

COUNTRY
NETHERLANDS

NAME OF REVIEWER
DR. H. MAGSI

NAME OF FOREIGN OFFICIAL
DR. W.A.M. JANSEN

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

FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE 2-27-2000	ESTABLISHMENT NO. AND NAME EST. 27, STURKOMBAT EINDHOVEN B.V.	CITY SON EN BREUGEL
			COUNTRY NETHERLANDS
NAME OF REVIEWER DR. H. MAGSI	NAME OF FOREIGN OFFICIAL DR. W.A.M. JANSEN		EVALUATION <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable

COMMENTS:

43/44. CONDEMNED, AND/OR INEDIBLE PRODUCT IS NOT DENATURE/DECHARACTERIZED BEFORE OFF-PREMISES SHIPMENT.

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE INTERNATIONAL ESTABLISHMENTS		REVIEW DATE	ESTABLISHMENT NO. AND NAME	CITY	
FOREIGN PLANT REVIEW FORM		2-15-2000	EST. 98, DUMECO OIJEN B.V.	OIJEN COUNTRY NETHERLANDS	
NAME OF REVIEWER DR. H. MAGSI		NAME OF FOREIGN OFFICIAL DRS. M. KOCOVIV, AND W.A.M. JANSEN		EVALUATION <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable	
CODES (Give an appropriate code for each review item listed below) A = Acceptable M = Marginally Acceptable U = Unacceptable N = Not Reviewed O = Does not apply					
1. CONTAMINATION CONTROL		Cross contamination prevention	28 A	Formulations	55 O
(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing	29 A	Packaging materials	56 A
Water potability records	01 A	Product handling and storage	30 A	Laboratory confirmation	57 O
Chlorination procedures	02 A	Product reconditioning	31 A	Label approvals	58 O
Back siphonage prevention	03 A	Product transportation	32 A	Special label claims	59 O
Hand washing facilities	04 A	(d) ESTABLISHMENT SANITATION PROGRAM		Inspector monitoring	60 O
Sanitizers	05 A	Effective maintenance program	33 A	Processing schedules	61 O
Establishments separation	06 A	Preoperational sanitation	34 A	Processing equipment	62 O
Pest --no evidence	07 A	Operational sanitation	35 A	Processing records	63 O
Pest control program	08 A	Waste disposal	36 A	Empty can inspection	64 O
Pest control monitoring	09 A	2. DISEASE CONTROL		Filling procedures	65 O
Temperature control	10 A	Animal identification	37 O	Container closure exam	66 O
Lighting	11 A	Antemortem inspec. procedures	38 O	Interim container handling	67 O
Operations work space	12 A	Antemortem dispositions	39 O	Post-processing handling	68 O
Inspector work space	13 A	Humane Slaughter	40 O	Incubation procedures	69 O
Ventilation	14 A	Postmortem inspec. procedures	41 O	Process. defect actions -- plant	70 O
Facilities approval	15 A	Postmortem dispositions	42 O	Processing control -- inspection	71 O
Equipment approval	16 A	Condemned product control	43 U	5. COMPLIANCE/ECON. FRAUD CONTROL	
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control	44 O	Export product identification	72 A
Over-product ceilings	17 A	Returned and rework product	45 A	Inspector verification	73 A
Over-product equipment	18 A	3. RESIDUE CONTROL		Export certificates	74 O
Product contact equipment	19 A	Residue program compliance	46 O	Single standard	75 A
Other product areas (inside)	20 A	Sampling procedures	47 O	Inspection supervision	76 A
Dry storage areas	21 A	Residue reporting procedures	48 O	Control of security items	77 A
Antemortem facilities	22 O	Approval of chemicals, etc.	49 A	Shipment security	78 A
Welfare facilities	23 A	Storage and use of chemicals	50 A	Species verification	79 A
Outside premises	24 A	4. PROCESSED PRODUCT CONTROL		"Equal to" status	80 A
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim	51 A	Imports	81 O
Personal dress and habits	25 A	Boneless meat reinspection	52 A		
Personal hygiene practices	26 A	Ingredients identification	53 O		
Sanitary dressing procedures	27 O	Control of restricted ingredients	54 O		

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE INTERNATIONAL PROGRAMS FOREIGN PLANT REVIEW FORM	REVIEW DATE 2-16-2000	ESTABLISHMENT NO. AND NAME EST. 124, DUMECO BEUNINGEN	CITY BEUNINGEN COUNTRY NETHERLANDS
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NAME OF REVIEWER DR. H. MAGSI	NAME OF FOREIGN OFFICIAL DRS. M. KOVCOVIC, AND W.A.M. JANSEN	EVALUATION <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable
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CODES (Give an appropriate code for each review item listed below)
 A = Acceptable M = Marginally Acceptable U = Unacceptable N = Not Reviewed O = Does not apply

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

INSPECTION PLANT REVIEW FORM (reverse)	REVIEW DATE 2-16-2000	ESTABLISHMENT NO. AND NAME EST. 124, DUMECO BEUNINGEN	CITY BEUNINGEN
			COUNTRY NETHERLANDS
NAME OF REVIEWER DR. H. MAGSI	NAME OF FOREIGN OFFICIAL DRS. M. KOVCOVIC, AND W.A.H. JANSEN		EVALUATION <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable

COMMENTS:

43. CONDEMNED, AND/OR INEDIBLE PRODUCT IS NOT DENATURE/DECHARACTERIZED BEFORE OFF-PREMISES SHIPMENT.

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE INTERNATIONAL PROGRAMS		REVIEW DATE	ESTABLISHMENT NO. AND NAME		CITY	
FOREIGN PLANT REVIEW FORM		2-17-2000	EST. 129, ZWANENBERG FOOD GROUP B.V.		ALMELO	
					COUNTRY NETHERLANDS	
NAME OF REVIEWER DR. H. MAGSI		NAME OF FOREIGN OFFICIAL DRS. FISSCHER-PETERS, & L. van DUIN		EVALUATION <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable		
CODES (Give an appropriate code for each review item listed below) A = Acceptable M = Marginally Acceptable U = Unacceptable N = Not Reviewed O = Does not apply						
1. CONTAMINATION CONTROL		Cross contamination prevention		28 A	Formulations	55 A
(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing		29 A	Packaging materials	56 A
Water potability records	01 A	Product handling and storage		30 A	Laboratory confirmation	57 A
Chlorination procedures	02 A	Product reconditioning		31 A	Label approvals	58 A
Back siphonage prevention	03 A	Product transportation		32 A	Special label claims	59 O
Hand washing facilities	04 A	(d) ESTABLISHMENT SANITATION PROGRAM			Inspector monitoring	60 A
Sanitizers	05 A	Effective maintenance program		33 A	Processing schedules	61 A
Establishments separation	06 A	Preoperational sanitation		34 A	Processing equipment	62 A
Pest --no evidence	07 A	Operational sanitation		35 A	Processing records	63 A
Pest control program	08 A	Waste disposal		36 A	Empty can inspection	64 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 A	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 U	5. COMPLIANCE/ECON. FRAUD CONTROL	
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control		44 O	Export product identification	72 A
Over-product ceilings	17 A	Returned and rework product		45 A	Inspector verification	73 A
Over-product equipment	18 A	3. RESIDUE CONTROL			Export certificates	74 A
Product contact equipment	19 A	Residue program compliance		46 O	Single standard	75 A
Other product areas (inside)	20 A	Sampling procedures		47 O	Inspection supervision	76 A
Dry storage areas	21 A	Residue reporting procedures		48 O	Control of security items	77 A
Antemortem facilities	22 O	Approval of chemicals, etc.		49 A	Shipment security	78 A
Welfare facilities	23 A	Storage and use of chemicals		50 A	Species verification	79 A
Outside premises	24 A	4. PROCESSED PRODUCT CONTROL			"Equal to" status	80 A
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim		51 A	Imports	81 O
Personal dress and habits	25 A	Boneless meat reinspection		52 A		
Personal hygiene practices	26 A	Ingredients identification		53 A		
Sanitary dressing procedures	27 O	Control of restricted ingredients		54 A		

FOREIGN OFFICIAL REVIEW FORM (reverse)	REVIEW DATE 2-17-2000	ESTABLISHMENT NO. AND NAME EST. 129, ZWANENBERG FOOD GROUP B.V.	CITY ALMELO COUNTRY NETHERLANDS
NAME OF REVIEWER DR. H. MAGSI	NAME OF FOREIGN OFFICIAL DRS. FISSCHER-PETERS, & L. van DUIN		EVALUATION <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable

COMMENTS:

43. CONDEMNED, AND/OR INEDIBLE PRODUCT IS NOT DENATURE/DECHARACTERIZED BEFORE OFF-PREMISES SHIPMENT.

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE INTERNATIONAL PROGRAMS FOREIGN PLANT REVIEW FORM	REVIEW DATE 2-21-2000	ESTABLISHMENT NO. AND NAME EST. T93, HENDRIK MEAT GROUP C.V.	CITY APELDOORN COUNTRY NETHERLANDS
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NAME OF REVIEWER DR. H. MAGSI	NAME OF FOREIGN OFFICIAL DRS. K. HELLWIG, AND W.A.M. JANSEN	EVALUATION <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable
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CODES (Give an appropriate code for each review item listed below)
 A = Acceptable M = Marginally Acceptable U = Unacceptable N = Not Reviewed O = Does not apply

1. CONTAMINATION CONTROL	Cross contamination prevention	28 A	Formulations	55 O
(a) BASIC ESTABLISHMENT FACILITIES	Equipment Sanitizing	29 A	Packaging materials	56 O
Water potability records	Product handling and storage	30 A	Laboratory confirmation	57 O
Chlorination procedures	Product reconditioning	31 A	Label approvals	58 O
Back siphonage prevention	Product transportation	32 A	Special label claims	59 O
Hand washing facilities	(d) ESTABLISHMENT SANITATION PROGRAM		Inspector monitoring	60 O
Sanitizers	Effective maintenance program	33 A	Processing schedules	61 O
Establishments separation	Preoperational sanitation	34 A	Processing equipment	62 O
Pest --no evidence	Operational sanitation	35 A	Processing records	63 O
Pest control program	Waste disposal	36 A	Empty can inspection	64 O
Pest control monitoring	2. DISEASE CONTROL		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 U	5. COMPLIANCE/ECON. FRAUD CONTROL	
(b) CONDITION OF FACILITIES EQUIPMENT	Restricted product control	44 U	Export product identification	72 A
Over-product ceilings	Returned and rework product	45 A	Inspector verification	73 A
Over-product equipment	3. RESIDUE CONTROL		Export certificates	74 O
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 A
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 A
Outside premises	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	Boneless meat reinspection	52 A		
Personal hygiene practices	Ingredients identification	53 O		
Sanitary dressing procedures	Control of restricted ingredients	54 O		

NAME OF REVIEWER DR. H. MAGSI	NAME OF FOREIGN OFFICIAL DRS. FISSHER-PETERS, & J. v.d. BERG	EVALUATION <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable
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CODES (Give an appropriate code for each review item listed below)
 A = Acceptable M = Marginally Acceptable U = Unacceptable N = Not Reviewed O = Does not apply

1. CONTAMINATION CONTROL	Cross contamination prevention	28 A	Formulations	55 O
(a) BASIC ESTABLISHMENT FACILITIES	Equipment Sanitizing	29 A	Packaging materials	56 O
Water potability records	Product handling and storage	30 A	Laboratory confirmation	57 O
Chlorination procedures	Product reconditioning	31 A	Label approvals	58 O
Back siphonage prevention	Product transportation	32 A	Special label claims	59 O
Hand washing facilities	(d) ESTABLISHMENT SANITATION PROGRAM		Inspector monitoring	60 O
Sanitizers	Effective maintenance program	33 A	Processing schedules	61 O
Establishments separation	Preoperational sanitation	34 A	Processing equipment	62 O
Pest --no evidence	Operational sanitation	35 A	Processing records	63 O
Pest control program	Waste disposal	36 A	Empty can inspection	64 O
Pest control monitoring	2. DISEASE CONTROL		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 U	5. COMPLIANCE/ECON. FRAUD CONTROL	
(b) CONDITION OF FACILITIES EQUIPMENT	Restricted product control	44 U	Export product identification	72 A
Over-product ceilings	Returned and rework product	45 A	Inspector verification	73 A
Over-product equipment	3. RESIDUE CONTROL		Export certificates	74 O
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 A
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 A
Outside premises	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	Boneless meat reinspection	52 A		
Personal hygiene practices	Ingredients identification	53 O		
Sanitary dressing procedures	Control of restricted ingredients	54 O		

SCIENCE PLANT REVIEW FORM (reverse)	REVIEW DATE 2-18-2000	ESTABLISHMENT NO. AND NAME EST. 369, B.V. EXPORTSLACHTERIJ APELDOORN ESA	CITY APELDOORN
			COUNTRY NETHERLANDS
NAME OF REVIEWER DR. H. MAGSI	NAME OF FOREIGN OFFICIAL DRS. FISSHER-PETERS, & J. v.d. BERG		EVALUATION <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable

COMMENTS:

43/44. CONDEMNED, AND/OR INEDIBLE PRODUCT IS NOT DENATURE/DECHARACTERIZED BEFORE OFF-PREMISES SHIPMENT.

FOREIGN PLANT REVIEW FORM

REVIEW DATE 2-22-2000	ESTABLISHMENT NO. AND NAME EST. 451, KOEL-EN VRIEHUIS LINTELG B.V.	CITY LICHTENVOORDE
		COUNTRY NETHERLANDS

NAME OF REVIEWER DR. H. MAGSI	NAME OF FOREIGN OFFICIAL DRS. K. HELLWIG, AND W.A.M. JANSEN	EVALUATION <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable
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CODES (Give an appropriate code for each review item listed below)
 A = Acceptable M = Marginally Acceptable U = Unacceptable N = Not Reviewed O = Does not apply

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

United States Department of Agriculture
Food Safety and Inspection Service
Sally Stratmoen, Chief, Equivalence Branch
International Policy Division
Office of Policy, Program
Development and Evaluation
Washington, D.C. 20251

Your letter of	your reference	our reference	date
		VVM004060/RF	04-01-2001
re:		extension no.	enclosures
FSIS one-site audit februari 2000		070-3785123	

Dear Ms. Stratmoen,

Thank you very much for your letter of 14 September, giving an overview of the results of the on-site audit by Dr. Hussain Magsi in the Netherlands from 10-28 February 2000 and the conference call of 10 August.

I would like to address the various issues for which the Netherlands was to provide additional information:

Postmortem inspection of large and skinned calves.

In recent years, the Netherlands has used a postmortem inspection system which differs on a few points from the literal regulations for procedures in the relevant EU regulations. These procedures are normally not performed since they are superfluous if not undesirable from a public health perspective. Our priority is risk assessment.

I mentioned already during my visit in march this year, the letter which I send to the European Commission (not translated attached as annex 1), which did not lead to negative reactions. Below I quote the relevant parts of that letter

‘EU Directive 64/433/EG distinguishes between calves younger and older than 6 weeks as regards inspections. The distinction is based on traditional farming systems in which veal calves are fed milk only until 6 weeks of age, after which fodder is added to the diet. In the Netherlands, however, the veal industry has developed quite differently. Calves are kept in closed buildings in intensive rearing establishments, which themselves are part of specialised production chains. Most calves over 6 weeks old are fed (almost) exclusively milk, which ensures that the risk of infection from zoonotic agents is negligible. The Netherlands uses a simplified inspection for calves older than 6 weeks which differs somewhat from that prescribed in 64/433/EG in that the head and heart are incised in a simpler way.

Directive 64/433/EG states that carcasses of calves over 6 months old must be split down the spinal column. Splitting is primarily of importance in establishing the presence of tuberculosis. The Netherlands is officially tuberculosis-free and monitors its tuberculosis-free status by testing bovine lymph nodes. The Netherlands therefore considers splitting carcasses of calves older than 6 months to be unnecessary. Furthermore, this is only done in the case of calves older than 6 months from the specialised product chain systems referred

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to above, which moreover are slaughtered in special veal slaughterhouses. Normally, carcasses of adult cattle and all animals slaughtered in beef slaughterhouses are split.”

RVV laboratory accreditation and oversight programs for private laboratories

Virtually all private laboratories have a Sterlab accreditation certificate (those that do not yet have Sterlab certification are in the process of acquiring it). The RVV performs a structural audit on those private laboratory involved in exportcertification to the USA, that have not yet a Sterlab accreditation. In addition, the RVV supervises private laboratory research by performing its own tests for aerobic bacterial counts, Enterobacteriaceae and Salmonella to verify the results of private laboratory research. We have enclosed for your further information:

- Agreement between the State and the Accreditation Council (Annex 2)
- Articles of Association, RvA-R1 (Annex 3)
- Regulations for Accreditation, RvA-R2 (Annex 4)
- Accreditation and the Community's Policy in the Field of Conformity Assessment (Annex 5)

Listeria testing

Beside the basic investigations the Inspectorate for Health Protection, Commodities and Veterinary Public Health, Ministry of Health, Welfare and Sport, performed last year a surveillance audit by investigating the incidence of pathogens in meat products in the retail trade in the Netherlands. The end result pointed out that Listeria has to this day not been a problem in the Dutch food chain. I quote/translate the relevant diagrams:

L. Monocytogenes counts in cutted meat products

Kind	N	n< 3 E1 3 E2 - <E2	>E2
Fermented products	76	76	- -
Cooked products	1641	1638	2 1
Raw producten	57	57	- -

L. Monocytogenes counts at best before time in cutted meat products

Kind	N	n< 3 E1 3 E2 - <E2	>E2
Fermented products	17	17	- -
Cooked products	265	264	- 1
Raw products	11	11	- -

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The EU is nonetheless working to prepare legislation on *Listeria monocytogenes*. Once this legislation takes effect we will of course conform to the prevailing regulations for monitoring *Listeria* in meat products.

As stated previously, meat product companies are required to perform a risk analysis for *Listeria* on ready-to-eat products destined for the US.

Enterobacteriaceae performance criteria

The modification of the action threshold (see change 001 in the Hygiene code dated 5 November 1997) concerned a change to the action threshold level of the aerobic bacterial count and not of Enterobacteriaceae. The action threshold level for Enterobacteriaceae has not been changed and needs no further equivalence determination.

I trust that the above has satisfactorily answered all of your questions. Should you have any additional questions or wish further information, please contact Mr. Rijckert van der Flier, tel. +31 (0)70 378 5123 (e-mail: r.j.van.der.flier@vvm.agro.nl)

Best regards,

CHIEF VETERINARY OFFICER

Frits H. Plumers

c.c. US. Embassy, The Hague, Mr. Ph. Letarte
Dutch Embassy, Washington, Mr. J. Groeneveld
Food and Veterinary Office, Dublin, Mr. K. van Dyck