



United States
Department of
Agriculture

Food Safety
and Inspection
Service

Washington, D.C.
20250

FEB 3 2004

Dr. Tony Zohrab
Director, Animal Products Group
New Zealand Food Safety Authority (NZFSA)
South Tower, 86 Jervois Quay
PO Box 2835
Wellington, New Zealand

Dear Dr. Zohrab:

This letter transmits the Food Safety and Inspection Service's final report of a meat inspection system audit conducted in New Zealand from June 12, 2003 through July 18, 2003. Comments from New Zealand have been included in the final report.

If you have any questions about this audit or need additional information, please contact me at 202-720-3781, by fax at 202-690-4040, or by email at sally.stratmoen@fsis.usda.gov.

Sincerely,

Sally Stratmoen, Director
International Equivalence Staff
Office of International Affairs
Food Safety and Inspection Service

Enclosure

cc: David Rosenbloom, Attaché, US Embassy, Wellington
Jason Frost, Technical Coord. Veterinary Services, Embassy of New Zealand
Susan Schayes, FAS Area Officer
Linda Swacina, Deputy Administrator, FSIS
Karen Stuck, Assistant Administrator, OIA, FSIS
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Donald Smart, Director, Review Staff, OPEER, FSIS
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Todd Furey, IES, OIA
Country File (FY2003 Audit – New Zealand)

FINAL

9 2004

FINAL REPORT OF AN AUDIT CARRIED OUT IN NEW
ZEALAND COVERING NEW ZEALAND'S MEAT
INSPECTION SYSTEM

JUNE 12 THROUGH JULY 18, 2003

Food Safety and Inspection Service
United States Department of Agriculture

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ABBREVIATIONS AND SPECIAL TERMS USED IN THE REPORT

CCA	Central Competent Authority, the New Zealand Food Safety Authority (NZFSA)
CIG	Compliance and Investigation Group
<i>E. coli</i>	<i>Escherichia coli</i>
FSIS	Food Safety and Inspection Service
PR/HACCP	Pathogen Reduction/ Hazard Analysis and Critical Control Point Systems
MAF	Ministry of Agriculture and Forestry
VA	Verification Agency
SSOP	Sanitation Standard Operating Procedures
<i>Salmonella</i>	<i>Salmonella</i> species
VTS	Veterinary Technical Supervisor (equivalent to Inspector-In-Charge)

1. INTRODUCTION

The audit took place in New Zealand from June 12 through July 18, 2003.

An opening meeting was held on June 12 in Wellington with the Central Competent Authority (CCA). At this meeting, the auditors confirmed the objective and scope of the audit, the audit itineraries, and requested additional information needed to complete the audit of New Zealand's meat inspection system.

The auditor was accompanied during the entire audit by representatives from the CCA, the New Zealand Food Safety Authority (NZFSA), and representatives from the regional and local inspection offices.

2. OBJECTIVE OF THE AUDIT

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

In pursuit of the objective, two courses of activity were conducted. First, the International Audit Staff Officer followed routine meat inspection audit procedures. The following sites were visited by the International Audit Staff Officer: the headquarters of the CCA, one regional inspection office, three laboratories performing analytical testing on United States-destined product, nine slaughter and processing establishments, and four meat processing establishments.

Competent Authority Visits			Comments
Competent Authority	Central	3	Wellington
	Regional	1	Christchurch
Laboratories		3	
Meat Slaughter Establishments		9	
Meat Processing Establishments		4	
Cold Storage Facilities		1	

Second, a Senior Equivalence Officer examined New Zealand's government oversight programs in more depth, following a partially independent itinerary. In pursuit of this additional objective, interviews were conducted with the following:

- NZFSA – one Director, Animal Products Group; five Deputy Directors, Compliance and Investigation Group (CIG); and four field employees.

- VA – one General Manager, one Technical Manager, one Quality Assurance Assessor, one Veterinary Trainer, eight Team Leaders, two Unit Coordinators, one Technical Specialist (with responsibility Listings for U.S. export eligibility), and two Veterinary Technical Supervisors
- ASURE – one Chief Executive Officer, two National Operation Managers, one Quality Manager, one Organizational Development Manager, one Technical Manager, one Account Manager, 10 Area Managers, and four Plant Supervisors

Competent Authority Visits			Comments
Competent Authority	MAF-VA/NZFSA Headquarters	1	on the North Island
	MAF/VA Local	12	
	ASURE Headquarters	1	on the South Island
	ASURE Local	9	
Laboratories		1	
Meat Slaughter/Processing Establishments		3	Bobby Veal/Ratite

3. PROTOCOL

The official on-site audit was conducted in four parts. One part involved visits with CCA officials to discuss oversight programs and practices, including enforcement activities. The second part involved an audit of a selection of records in New Zealand's inspection headquarters or regional offices. The third part involved on-site visits to 13 establishments (nine slaughter establishments and four processing establishments) and one cold-storage facility. The fourth part involved visits to one private and two government laboratories. The government-owned and -operated Agriquality Lab Network Lynfield, in Blockhouse Bay, Auckland was conducting analyses of field samples for the presence of generic *Escherichia coli* (*E. coli*) and *Salmonella*. The private laboratory in Est. ME-23, Alliance Group, Maitua Plant, in Maitua, was conducting analyses of samples collected in the same establishment for the presence of generic *E. coli*. The government-owned and -operated AgriQuality New Zealand, Ltd. laboratory, in Lower Hutt, was conducting analyses of field samples for New Zealand's national residue control program.

In addition, two ratite (ostrich) slaughter facilities were visited in anticipation of the forthcoming requirement for ratite establishments wishing to export to the U.S. to achieve equivalence to the Poultry Products Inspection Act, the deadline for which has been extended to October 1, 2003.

Program effectiveness determinations of New Zealand's inspection system focused on five areas of risk: (1) sanitation controls, including the implementation and operation of

Sanitation Standard Operating Procedures, (2) animal disease controls, (3) slaughter/processing controls, including the implementation and operation of HACCP programs and the testing program for generic *E. coli*, (4) residue controls, and (5) enforcement controls, including the testing program for *Salmonella* species. New Zealand's inspection system was assessed by evaluating these five risk areas.

During all on-site establishment visits, the auditors evaluated the nature, extent and degree to which findings impacted on food safety and public health. The auditors also assessed how inspection services are carried out by New Zealand and also determined if establishment and inspection system controls were in place to ensure the production of meat products that are safe, unadulterated and properly labeled.

During the opening meeting, the lead auditor explained that New Zealand's inspection system would be audited in accordance with two areas of focus. First, the lead auditor would audit against FSIS requirements. These include daily inspection in all certified establishments, humane handling and slaughter of animals, the handling and disposal of inedible and condemned materials, species verification testing, and FSIS' requirements for HACCP, SSOP, testing for generic *E. coli* and *Salmonella* species.

Second, the auditor would audit against any equivalence determinations that have been made by FSIS for New Zealand under provisions of the Sanitary/Phytosanitary Agreement.

Currently, FSIS has determined that four alternate procedures are equivalent to FSIS requirements, regarding alternate testing measures for generic *E. coli*, alternate testing measures for *Salmonella* species, alternate post-mortem inspection procedures for adult bovines, and alternate post-mortem inspection procedures for 5- to 10-day-old "bobby" calves.

4. LEGAL BASIS FOR THE AUDIT

The audit was undertaken under the specific provisions of United States laws and regulations, in particular:

- The Federal Meat Inspection Act (21 U.S.C. 601 et seq.),
- The Federal Meat Inspection Regulations (9 CFR Parts 301 to end), which include the Pathogen Reduction/HACCP regulations, and
- The Poultry Products Inspection Act (21 U.S.C. 451 et seq.) and the Poultry Products Inspection Regulations (9 CFR Part 381]

5. SUMMARY OF PREVIOUS AUDITS

Final audit reports are available on FSIS' website at www.fsis.usda.gov/ofotsc.

The last FSIS audit of New Zealand's inspection system was conducted in April 2002. The following deficiencies were identified:

- In three of the 27 establishments whose documents were audited, the hazard analyses had not resulted in the identification of any Critical Control Points. This was a repeat finding from the previous FSIS audit in May-June, 2001.
- In five of the nine slaughter establishments audited, the hazard analyses did not include the microbiological food safety hazard of fecal contamination.
- In five of the 13 establishments audited on-site, Critical Control Points, Critical Limits, and corrective actions were not specified in the HACCP programs.
- In four of the 13 establishments, verification, validation and reassessment of HACCP plans were not adequately recorded.
- In four establishments, the flow charts did not include all process steps.
- In four establishments, corrective actions and/or preventive measures, taken in response to sanitation deficiencies, were not being adequately recorded.
- In three establishments, no Pre-Shipment Document Reviews were performed.
- In one establishment, internal supervisory reviews had not been conducted for three months during the previous year.
- In one establishment, the results of the testing program for generic *E. coli* were not being recorded on a process control chart as required.
- In one establishment, procedures for condemned product control were lacking.
- In one establishment, a boot wash facility was located inside the boning room close to a cutting table, creating a potential for aerosol contamination of edible product.

6. MAIN FINDINGS

6.1 Government Oversight

6.1.1 CCA Control Systems

Oversight of the New Zealand meat inspection system is provided by the Ministry of Agriculture and Forestry (MAF) and the Minister of State Owned Enterprises (MSOE). MAF oversight is provided by the New Zealand Food Safety Authority (NZFSA) through the Compliance and Investigation Group (CIG), the Animal Products Group (APG), and the Operations Group (OG). The Verification Agency (VA) is part of OG and the Director of APG is the FSIS contact or chief veterinary officer for New Zealand's meat inspection system. MSOE provides oversight through ASURE New Zealand. The

various responsibilities of these organizations are outlined in a Memorandum of Understanding dated June 2003, stating that MAF/NZFSA/APG sets the standards, applies sanctions, and provides the statutory authorization to VA and ASURE. NZFSA/CIG audits the performance of VA, ASURE, and industry. MAF Verification Agency implements the standards, verifies that they are met, and certifies product as such. ASURE inspects livestock and product and performs associated tasks such as slaughter brand control and product sampling.

Both VA and ASURE have divided their field staff according to the location, number, and complexity of the establishment. VA is divided into eight areas, each managed by a Team Leader who maintains technical competence. Four of the eighteen ASURE managers work exclusively with the four major corporations in New Zealand. ASURE managers are located in nine offices with various designations. Most ASURE managers do not maintain complete technical competency.

6.1.2 Ultimate Control and Supervision

Overall, New Zealand delivers and maintains a unique meat inspection system. MAF/VA maintains a physical presence in all establishments where ASURE is present. ASURE performs ante- and post-mortem inspection and related activities. VA is designed to verify that ASURE employees are effectively and accurately delivering their mandatory functions and that establishments are in compliance with all New Zealand and FSIS requirements.

New technical information that is New Zealand law for domestic purposes is issued by specification under the Animal Products Act 1999. New information that is over and above the New Zealand domestic law requirements, is legally notified under the Act and distributed to all meat inspection employees in the form of Overseas Market Access Requirements (OMARs) and General Export Requirements (GREX). There are also a number of Technical Directives (TDs) that have been carried over from the former Meat Act regime that have been given the full effect of law under the Animal Products Act 1999.

With respect to ante-mortem and post-mortem specifications these are notified via specification and distributed to ASURE staff in the form of manuals.

ASURE serves the meat inspection program in a unique environment. On the one hand, ASURE is obliged to make a profit as an SOE; however, on the other hand, ASURE is not allowed to make a profit from the costs imposed on industry for meat inspection. ASURE is, therefore, commercially driven to provide “Added Value” work that ASURE performs for industry on a fee basis. However, only 2-3 percent of ASURE’s income comes from fee work. Fees are standardized, payments are made directly to ASURE headquarters, and the employees are always accountable to ASURE.

In order to perform fee work, an ASURE employee temporarily turns in (“surrenders”) his/her authorization to inspect (Warrant), performs the work, and retrieves the Warrant before performing mandatory inspection work. Occasionally, an employee will perform

long-term fee work or work on a trial basis before actually leaving ASURE. However, ASURE is required to implement measures to identify and manage potential areas of conflict of interest in order to meet the relevant standards of NZFSA.

FSIS is reviewing the efficacy of NZFSA-VA's ultimate control and supervision over official activities of all government, including ASURE employees, in certified establishments.

6.1.3 Assignment of Competent, Qualified Inspectors

The process of maintaining competency and compliance is approached differently by NZFSA, VA, and ASURE. NZFSA performs CIG audits, on a periodic basis, that cover VA, ASURE, and industry activities and compliance. VA performs Technical Reviews of establishment compliance and inspection activities and conducts Performance Based Verification (PBV) audits and Bulk Audits of each Establishment and of the ASURE presence within that establishment. VA also performs frequent Regulatory Overviews at each establishment. ASURE performs Statistical Process Control System (SPCS) Checks on the various aspects (22 Systems) of inspection that they monitor or perform. SPCS Checks include Procedures Checks and Decision Checks.

The VA Technical Reviews, in combination with CIG Audits, comply with the monthly supervisory visits required by FSIS. Team Leaders and Unit Coordinators perform this function for VA and maintain their competency via the Quality Assurance Assessor, who is supervised by the VA Technical Manager.

6.1.4 Authority and Responsibility to Enforce the Laws

Accountability for administrative and technical activities also varies between VA and ASURE. For example, the VA Technical Manager is technically accountable to the Director of the Animal Products Group, NZFSA, who is also the contact person for FSIS. However, this manager is administratively accountable to and supervised by the General Manager for VA. Fortunately, the Agency Technical Manager is the supervisor of the Team Leaders, who manage the field inspection staff. In contrast, the ASURE Technical Manager does not directly supervise the field inspection staff, and most of the Area/Site Managers who do have supervisory responsibilities, do not maintain their technical competence in meat inspection.

6.1.5 Adequate Administrative and Technical Support

NZFSA/VA has the ability to support a third party audit.

6.2 Headquarters Audits

The auditor conducted a review of inspection system documents at the headquarters of the inspection service and in one regional 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,
- Label approval records such as generic labels, and animal raising claims,
- New laws and implementation documents such as regulations, notices, directives and guidelines,
- Sampling and laboratory analyses for residues,
- 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, and
- Enforcement records, including examples of criminal prosecution, seizure and control of noncompliant product, and delisting an establishment that is certified to export product to the United States.

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

6.3.1 Audits of Regional Inspection Offices

In the course of the routine audit, the regional MAF VA office in Christchurch was visited, in order to review documents regarding internal review reports and other supervisory visits to establishments that were certified to export to the U.S., training records for NZFSA officials, and export certificates. No concerns arose as a result of the document reviews.

7. ESTABLISHMENT AUDITS

The FSIS auditor visited a total of 13 establishments—nine slaughter/processing establishments and four processing establishments—and one cold-storage facility (the two unofficial on-site audits of ratite facilities are not included in this count). None were delisted by New Zealand because of failure to meet basic U.S. requirements. Two received “Notices of Intent to Delist” from New Zealand because of deficiencies involving SSOP implementation and, in one of these, an additional deficiency regarding HACCP implementation. These establishments may retain their certification for export to the United States provided that they correct all deficiencies noted during the audit within 30 days of the date the establishment was audited.

8. RESIDUE AND MICROBIOLOGY LABORATORY AUDITS

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

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

Microbiology laboratory audits focus on analyst qualifications, sample receipt, timely analysis, analytical methodologies, analytical controls, recording and reporting of results, and check samples. If private laboratories are used to test United States samples, the auditor evaluates compliance with the criteria established for the use of private laboratories under the FSIS Pathogen Reduction/HACCP requirements.

The following laboratories were audited:

- The government- owned and -operated Agriquality Lab Network Lynfield, in Blockhouse Bay, Auckland.
- The private laboratory in Est. ME-23, Alliance Group, Maitava Plant, in Maitava.
- The government-owned and -operated AgriQuality New Zealand, Ltd. laboratory in Lower Hutt.

The findings in these laboratories will be discussed in Section 11.3 (Testing for generic *E. coli*), 12 (RESIDUE CONTROLS), and 13.2 (Testing for Salmonella species) of this report.

9. SANITATION CONTROLS

As stated earlier, the FSIS auditor focuses on five areas of risk to assess New Zealand's meat inspection system. The first of these risk areas that the FSIS auditor reviewed was Sanitation Controls.

Based on the on-site audits of establishments, and except as noted below, New Zealand's inspection system had controls in place for SSOP programs, all aspects of facility and equipment sanitation, the prevention of actual or potential instances of product cross-contamination, good personal hygiene practices, and good product handling and storage practices.

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

9.1 SSOP

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOP were met, according to the criteria employed in the U.S. domestic inspection program. The SSOP in the 13 establishments were found to meet the basic FSIS regulatory requirements; however, in two establishments, the following implementation deficiencies were identified:

- In one establishment, maintenance and cleaning of over-product structures and equipment in several production and other exposed-product areas had been neglected

to varying degrees, with rust, flaking paint, and cobwebs in evidence. It was noted that this had been identified by the MAF-VA official as the major concern during his last internal technical review.

- In one establishment, housekeeping was found to be poor in a number of edible product support areas (corridors, small chemical store rooms, and cleaning cabinets).
- Maintenance and cleaning of hand-operated rail gates had been neglected in the lamb carcass cooler in one establishment.
- A deteriorated and frayed conveyor belt was in use in the beef boning room in one establishment.
- Condensation was found on rails over exposed beef quarters in one establishment.
- In two other establishments, lesser degrees of neglected maintenance and cleaning of over-product equipment were identified, and in two establishments, housekeeping was found to be poor in edible product support areas.

9.2 OTHER SANITATION CONCERNS

- In each of two establishments, one small piece of fecal contamination was identified (by the boning room foreman) on a lamb carcass that had passed the pre-cutting trim station. Immediate corrective actions were implemented, including re-inspection of all product in the boning room that had been processed since the last break and adding a new pre-boning trimmer.
- In one establishment, pre-boning trimmers were not using hand soap after trimming beef quarters which had been potentially contaminated with condensation. This was identified by the FSIS auditor; the NZFSA/VA officials ordered immediate corrective actions.
- In one establishment, several members of the audit team, being guided by an establishment official, did not wash their hands as required upon entering carcass coolers at the start of the day's audit.
- In one establishment, light was inadequate at the inspection surfaces of the anterior abdominal cavities and the medial retropharyngeal lymph nodes of beef carcasses. The NZFSA/VA officials ordered prompt correction.
- In two establishments, there were instances of inadequate separation of clean and street clothes.

10. ANIMAL DISEASE CONTROLS

The second of the five risk areas that the FSIS auditor reviewed was Animal Disease Controls. These controls include ensuring adequate animal identification, control over

condemned and restricted product, and procedures for sanitary handling of returned and reconditioned product. The auditor determined that New Zealand's inspection system had adequate controls in place. No deficiencies were noted.

Furthermore, bovine and bobby calf slaughter were performed in accordance with the alternate procedures determined to be equivalent by FSIS.

There had been no outbreaks of animal diseases with public health significance since the last FSIS audit.

11. SLAUGHTER/PROCESSING CONTROLS

The third of the five risk areas that the FSIS auditor reviewed was Slaughter/Processing Controls. The controls include the following areas: ante-mortem inspection procedures, ante-mortem disposition, humane handling and humane slaughter, post-mortem inspection procedures, post-mortem disposition, ingredients identification, control of restricted ingredients, formulations, processing schedules, equipment and records, and processing controls of cured, dried, and cooked products.

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

11.1 Humane Handling and Humane Slaughter

No deficiencies were noted.

11.2 HACCP Implementation

All establishments approved to export meat products to the United States are required to have developed and adequately implemented a HACCP program. Each of these programs was evaluated according to the criteria employed in the United States' domestic inspection program.

The HACCP programs were reviewed during the on-site audits of the 13 establishments. All establishments had adequately implemented the basic PR/HACCP requirements; however, in 10 establishments, improvements were indicated. The following deficiencies were identified:

- In all nine of the certified slaughter establishments audited, written corrective actions to be taken, in the event that critical limits are exceeded, did not include re-inspection of the product back to the last acceptable monitoring check.
- In one establishment, no consideration of product disposition, in the event that the critical limit (of zero visible contamination with feces or ingesta) was exceeded, was included in the written HACCP plan, as required by both FSIS and NZFSA/VA.

- In one establishment, there were several illegible corrections in one of the documents for the monitoring of critical limits.
- In one establishment, the Pre-Shipment Document Review form did not include an adequate description of the amount of product covered by the review.

11.3 Testing for Generic *E. coli*

New Zealand has adopted the FSIS regulatory requirements for testing for generic *E. coli* with the exception of the following equivalent measures, which have been determined to be equivalent by FSIS:

- The testing frequency in lambs and sheep is five carcasses per week; this alternate frequency was written into the HACCP plans as required in all the slaughter establishments visited during this audit.
- New Zealand samples cattle at three sites: flank, brisket, and outside hind-leg.
- New Zealand samples bobby calves at three sites: flank, foreleg, and fore-rump.
- New Zealand uses a swab sampling tool.

Nine of the 13 establishments audited were required to meet the basic FSIS regulatory requirements for testing for generic *E. coli* and were evaluated according to the criteria employed in the United States' domestic inspection program.

Testing for generic *E. coli* was properly conducted in all of the nine slaughter establishments.

11.4 Testing for *Listeria monocytogenes*

Testing for *Listeria monocytogenes* was being performed where it was required.

12. RESIDUE CONTROLS

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

The government-owned and -operated AgriQuality New Zealand, Ltd. laboratory in Lower Hutt was audited. No deficiencies were noted.

New Zealand's National Residue Testing Plan for 2002-03 was being followed and was on schedule.

13. ENFORCEMENT CONTROLS

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

13.1 Daily Inspection in Establishments

Inspection was being conducted daily in all slaughter and processing establishments.

13.2 Testing for *Salmonella* Species

New Zealand' has adopted the FSIS regulatory requirements for testing for *Salmonella* with the exception of the following equivalent measures, which have been determined to be equivalent by FSIS:

- Establishments take samples.
- Private laboratories analyze samples.
- A swab sampling tool is used.
- Samples are taken at the end of the slaughter or production process and prior to the carcass being cut and/or packaged.

Nine of the 13 establishments audited were required to meet the basic FSIS regulatory requirements for testing for *Salmonella* species and were evaluated according to the criteria employed in the United States' domestic inspection program.

Testing for *Salmonella* species was properly conducted in all of the nine establishments.

13.3 Species Verification

At the time of this audit, New Zealand was required to test product for species verification. Species verification was being conducted in those establishments in which it was required.

13.4 Monthly Reviews

During this audit it was found that in all establishments visited, monthly supervisory reviews of certified establishments were being performed and documented as required. A national mandate for the implementation of monthly internal supervisory reviews has been implemented.

13.5 Inspection System Controls

The CCA had controls in place for ante-mortem and post-mortem inspection procedures and dispositions; restricted product and inspection samples; disposition of dead, dying, diseased or disabled animals; shipment security, including shipment between

establishments; and prevention of commingling of product intended for export to the United States with product intended for the domestic market.

Furthermore, controls were in place for the importation of only eligible meat products from other countries for further processing, security items, shipment security, and products entering the establishments from outside sources.

National mandates for the implementation of compliance with the requirements for reassessment of *E. coli* 0157:H7 as a hazard and for control of retained water have been implemented as Overseas Market Access Requirements (OMARs).

In nine of the 13 certified establishments audited, deficiencies were found (especially regarding SSOP and HACCP programs) that should have been identified and addressed by NZFSA/VA prior to this FSIS audit.

14. CLOSING MEETING

A closing meeting was held on July 18, 2003 in Wellington with the CCA. At this meeting, the primary findings, conclusions, and recommendations from the audit were presented by the auditor.

The CCA understood and accepted the findings.

Gary D. Bolstad, DVM
International Audit Staff Officer



15. ATTACHMENTS

Individual Foreign Laboratory Audit Form

Individual Foreign Establishment Audit Forms

Foreign country response to Draft Final Audit Report (when available)

June 17, 2003

Agriquality Lab Network Lynfield

Att 17-20

FOREIGN COUNTRY LABORATORY REVIEW

FOREIGN GOV'T AGENCY
 Gov't owned and operated (Ministry of State-Owned Enterprises)

CITY & COUNTRY
 Auckland, New Zealand

ADDRESS OF LABORATORY
 131 Boundary Rd.
 Blockhouse Bay, Auckland

NAME OF REVIEWER
 Dr. Gary D. Bolstad

NAME OF FOREIGN OFFICIAL
 Dr. Ziggy Bojarski, Assessor, CIG; Ms. Gail Mustor, Sr. Advisor (Microbiology)

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

SIGNATURE OF REVIEWER

DATE

[Handwritten Signature]

June 17, 2003

FOREIGN COUNTRY LABORATORY REVIEW

(Comment Sheet)

REVIEW DATE

June 17, 2003

NAME OF FOREIGN LABORATORY

Agriquality Lab Network Lynfield

A-1b

FOREIGN GOV'T AGENCY

Gov't owned and operated (Ministry of State-Owned Enterprises)

CITY & COUNTRY

Auckland, New Zealand

ADDRESS OF LABORATORY

131 Boundary Rd.
Blockhouse Bay, Auckland

NAME OF REVIEWER

Dr. Gary D. Bolstad

NAME OF FOREIGN OFFICIAL

Dr. Ziggy Bojarski, Assessor, CIG; Ms. Gail Mustor, Sr. Advisor (Microbiology)

RESIDUE	ITEM NO.	COMMENTS
		This laboratory is State-owned and operated, and is accountable to MAF.
		No comments were necessary.

July 11, 2003

The Alliance Group, Mataura Plant (ME-23)

FOREIGN COUNTRY LABORATORY REVIEW

FOREIGN GOV'T AGENCY
 Privat lab; Oversight by New Zealand
 Food Safety Authority

CITY & COUNTRY
 Mataura, New Zealand

ADDRESS OF LABORATORY
 1 McQueen Ave., Mataura, New Zealand

NAME OF REVIEWER
 Dr. Gary D. Bolstad

NAME OF FOREIGN OFFICIAL
 Dr. Jack Pociеча, CIG; Dr. Rodney Walker, Team Leader

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

SIGNATURE OF REVIEWER



DATE

July 11, 2003

FOREIGN COUNTRY LABORATORY REVIEW

(Comment Sheet)

REVIEW DATE

NAME OF FOREIGN LABORATORY

July 11, 2003

The Alliance Group, Mataura Plant (ME-23)

A-2b

<p>FOREIGN GOV'T AGENCY Privat lab; Oversight by New Zealand Food Safety Authority</p>	<p>CITY & COUNTRY Mataura, New Zealand</p>	<p>ADDRESS OF LABORATORY 1 McQueen Ave., Mataura, New Zealand</p>
<p>NAME OF REVIEWER Dr. Gary D. Bolstad</p>	<p>NAME OF FOREIGN OFFICIAL Dr. Jack Pociecha, CIG; Dr. Rodney Walker, Team Leader</p>	

RESIDUE	ITEM NO.	COMMENTS
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No comments were necessary.

July 16, 2003

AgriQuality New Zealand Ltd

7-30

FOREIGN COUNTRY LABORATORY REVIEW

FOREIGN GOV'T AGENCY
 New Zealand Food Safety Authority

CITY & COUNTRY
 Lower Hutt, New Zealand

ADDRESS OF LABORATORY
 1B Bell Road, Gracefield, Lower Hutt

NAME OF REVIEWER
 Gary D. Bolstad, DVM

NAME OF FOREIGN OFFICIAL
 Dr. Ziggy Bojarski, Assessor, Compliance & Investigation Group, NZFSA

Residue Code/Name			abc	des	sul	ivm	lev								
SAMPLING PROCEDURES	REVIEW ITEMS	ITEM #	EVALUATION CODE												
	Sample Handling	01	A	A	A	A	A								
	Sampling Frequency	02	A	A	A	A	A								
	Timely Analyses	03	A	A	A	A	A								
	Compositing Procedure	04	O	O	O	O	O								
	Interpret Comp Data	05	O	O	O	O	O								
Data Reporting	06	A	A	A	A	A									
ANALYTICAL PROCEDURES	Acceptable Method	07	A	A	A	A	A								
	Correct Tissue(s)	08	A	Urine	A	Liver	Liver								
	Equipment Operation	09	A	A	A	A	A								
	Instrument Printouts	10	A	A	A	A	A								
QUALITY ASSURANCE PROCEDURES	Minimum Detection Levels	11	A	A	A	A	A								
	Recovery Frequency	12	A	A	A	A	A								
	Percent Recovery	13	A	A	A	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	O	A	O								
REVIEW	Corrected Prior Deficiencies	18	A	A	A	A	A								
OTHER REVIEW		19													
		20													

SIGNATURE OF REVIEWER

G. D. Bolstad

DATE

July 16, 2003

FOREIGN COUNTRY LABORATORY REVIEW

(Comment Sheet)

REVIEW DATE

July 16, 2003

NAME OF FOREIGN LABORATORY

AgriQuality New Zealand Ltd

H-3b

FOREIGN GOV'T AGENCY New Zealand Food Safety Authority	CITY & COUNTRY Lower Hutt, New Zealand	ADDRESS OF LABORATORY 1B Bell Road, Gracefield, Lower Hutt
NAME OF REVIEWER Gary D. Bolstad, DVM	NAME OF FOREIGN OFFICIAL Dr. Ziggy Bojarski, Assessor, Compliance & Investigation Group, NZFSA	

RESIDUE	ITEM NO.	COMMENTS
		Abbreviations: ABC = antibiotics, DES = diethylstilbestrol, sul = sulfonamides, IVM = ivermectin, and LEV = levamisole.
ABC	10	There were no printouts for antibiotics: the analyses were done by bioassay. (This was not a deficiency.)
SUL	10	No printouts for sulfonamides were available for review: only bobby calves are sampled for sulfonamides, and the season for their slaughter had only just begun. Past chromatograms had been archived in a different location when the laboratory moved to a new location several months previously.

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Lamb Packers Feilding, Ltd Feilding	2. AUDIT DATE June 13, 2003	3. ESTABLISHMENT NO. DSP-18	4. NAME OF COUNTRY New Zealand
5. NAME OF AUDITOR(S) Dr. Gary D. Bolstad		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	

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

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements		Part E - Other Requirements	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements		40. Light	
14. Developed and implemented a written HACCP plan .	O	41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	O	42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.	O	43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.	O	44. Dressing Rooms/Lavatories	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		45. Equipment and Utensils	
18. Monitoring of HACCP plan.	O	46. Sanitary Operations	O
19. Verification and validation of HACCP plan.	O	47. Employee Hygiene	O
20. Corrective action written in HACCP plan.	O	48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.	O	Part F - Inspection Requirements	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	O	49. Government Staffing	
Part C - Economic / Wholesomeness		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	
24. Labeling - Net Weights		52. Humane Handling	O
25. General Labeling		53. Animal Identification	O
26. Fin. Prod. Standards/Boneless (Defects/AQL/Park Skins/Moisture)		54. Ante Mortem Inspection	O
Part D - Sampling Generic E. coli Testing		55. Post Mortem Inspection	O
27. Written Procedures	O	Part G - Other Regulatory Oversight Requirements	
28. Sample Collection/Analysis	O	56. European Community Directives	O
29. Records	O	57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions	O	59.	
31. Reassessment	O		
32. Written Assurance	O		

60. Observation of the Establishment

B-1b

Est. DSP-18, Lamb Packers Feilding. Ltd; Feilding, New Zealand; June 13, 2003.

14, 15, 16, 17, 18, 19, 20, 21, 22, 27, 28, 29, 30, 31, 32 There were no HACCP and *E. coli* testing requirements at the time of this audit, since the establishment was not officially listed as eligible to export to the U.S. (equivalence with the requirements of the Poultry Products Inspection Act had not yet been determined).

46, 47, 52, 53, 54, 55 There were no operations on the day of the audit.

NOTE: This was not an official audit; only ratite meat is exported to the United States from this establishment. As stated above, at the time of this audit, the establishment was not officially listed as eligible to export to the U.S. (equivalence with the requirements of the Poultry Products Inspection Act had not yet been determined).

61. NAME OF AUDITOR

Garv D. Bolstad, DVM

62. AUDITOR SIGNATURE AND DATE

Donald C. Smith

6/13/03

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Jack Link's New Zealand Limited Mangere, Auckland	2. AUDIT DATE 06/16/2003	3. ESTABLISHMENT NO. JL1	4. NAME OF COUNTRY New Zealand
5. NAME OF AUDITOR(S) Dr. Gary D. Bolstad		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	

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

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements		Audit Results	Part D - Continued Economic Sampling		Audit Results
7. Written SSOP			33. Scheduled Sample		O
8. Records documenting implementation.			34. Species Testing		O
9. Signed and dated SSOP, by on-site or overall authority.			35. Residue		O
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements			Part E - Other Requirements		
10. Implementation of SSOP's, including monitoring of implementation.			36. Export		
11. Maintenance and evaluation of the effectiveness of SSOP's.			37. Import		
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.			38. Establishment Grounds and Pest Control		
13. Daily records document item 10, 11 and 12 above.			39. Establishment Construction/Maintenance		
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements			40. Light		
14. Developed and implemented a written HACCP plan .			41. Ventilation		
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.			42. Plumbing and Sewage		
16. Records documenting implementation and monitoring of the HACCP plan.			43. Water Supply		
17. The HACCP plan is signed and dated by the responsible establishment individual.			44. Dressing Rooms/Lavatories		
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements			45. Equipment and Utensils		
18. Monitoring of HACCP plan.			46. Sanitary Operations		
19. Verification and validation of HACCP plan.			47. Employee Hygiene		
20. Corrective action written in HACCP plan.			48. Condemned Product Control		
21. Reassessed adequacy of the HACCP plan.			Part F - Inspection Requirements		
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		X	49. Government Staffing		
Part C - Economic / Wholesomeness			50. Daily Inspection Coverage		
23. Labeling - Product Standards			51. Enforcement		
24. Labeling - Net Weights			52. Humane Handling		O
25. General Labeling			53. Animal Identification		O
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)			54. Ante Mortem Inspection		O
Part D - Sampling Generic E. coli Testing			55. Post Mortem Inspection		O
27. Written Procedures		O	Part G - Other Regulatory Oversight Requirements		
28. Sample Collection/Analysis		O	56. European Community Directives		O
29. Records		O	57. Monthly Review		
Salmonella Performance Standards - Basic Requirements			58.		
30. Corrective Actions		O	59.		
31. Reassessment		O			
32. Written Assurance		O			

60. Observation of the Establishment

B-2b

Est. JL1, Jack Link's New Zealand, Ltd.; Mangere, Auckland, New Zealand; June 16, 2003.

22 There were several illegible corrections in one of the documents for monitoring critical limits; the CIG Assessor identified this and ordered immediate re-education of the monitoring personnel.

61. NAME OF AUDITOR
Gary D. Bolstad, DVM

GC

62. AUDITOR SIGNATURE AND DATE

Donald C. Smith

6/16/03

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION PPCS Belfast Belfast	2. AUDIT DATE July 3, 2003	3. ESTABLISHMENT NO. ME-15	4. NAME OF COUNTRY New Zealand
5. NAME OF AUDITOR(S) Dr. Gary D. Bolstad		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	

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

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	O
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements		Part E - Other Requirements	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	X
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements		40. Light	
14. Developed and implemented a written HACCP plan.		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	O
19. Verification and validation of HACCP plan.		47. Employee Hygiene	O
20. Corrective action written in HACCP plan.	X	48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		Part F - Inspection Requirements	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
Part C - Economic / Wholesomeness		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	X
24. Labeling - Net Weights		52. Humane Handling	O
25. General Labeling		53. Animal Identification	O
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	O
Part D - Sampling Generic E. coli Testing		55. Post Mortem Inspection	O
27. Written Procedures		Part G - Other Regulatory Oversight Requirements	
28. Sample Collection/Analysis		56. European Community Directives	O
29. Records		57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

B-3b

Est. ME-15, PPCS Belfast, Belfast, New Zealand; July 3, 2003.

20/51 The corrective actions to be taken in the event that critical limits are exceeded did not, however, include reinspection of the product back to the last acceptable monitoring check. The NZFA officials should have identified this deficiency in advance of this audit. This finding was consistent in all the slaughter establishments audited, and the requirement was discussed in detail as a national issue during the exit meetings for the establishment and for the country as well.

39 Numerous old cobwebs were found in the main carton store room. The MAF officials ordered prompt correction.

46, 47, 52, 53, 54, 55 NOTE: No operations were being conducted on the day of the audit; the establishment had closed for the (winter) season on June 26, 2002.

61. NAME OF AUDITOR

Gary D. Bolstad, DVM



62. AUDITOR SIGNATURE AND DATE



7/3/03

B 170

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Canterbury Frozen Meat Co., Ltd. Pareora	2. AUDIT DATE July 7, 2003	3. ESTABLISHMENT NO. ME-34	4. NAME OF COUNTRY New Zealand
5. NAME OF AUDITOR(S) Dr. Gary D. Bolstad		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	

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

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements		Part E - Other Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	X	36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	X
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements		40. Light	
14. Developed and implemented a written HACCP plan.		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	X
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.	X	48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		Part F - Inspection Requirements	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
Part C - Economic / Wholesomeness		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	
24. Labeling - Net Weights		52. Humane Handling	
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	
Part D - Sampling Generic E. coli Testing		55. Post Mortem Inspection	
27. Written Procedures		Part G - Other Regulatory Oversight Requirements	
28. Sample Collection/Analysis		56. European Community Directives	
29. Records		57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58. <i>NOID</i>	X
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

B-4b

Est. ME-34, Canterbury Frozen Meat Co., Ltd., Pareora, New Zealand; July 7, 2003.

10/39 (A) Maintenance and cleaning of over-product structures and equipment in several production and other exposed-product areas had been neglected to varying degrees, with rust, flaking paint, and cobwebs in evidence. This had been identified by the lead auditor as the major concern during his last internal supervisory visit on June 30, 2003; some of the problem areas he had identified had been adequately addressed, but there were others that had not. (B) Housekeeping was found to be poor in a number of edible product support areas (corridors, small chemical store rooms, and cleaning cabinets).

20/51 The corrective actions to be taken in the event that critical limits are exceeded did not include reinspection of the product back to the last acceptable monitoring check. The NZFA officials should have identified this deficiency in advance of this audit. This finding was consistent in all the slaughter establishments audited, and the requirement was discussed in detail as a national issue during the exit meetings for the establishment and for the country as well.

39/51 There was no hand soap dispenser for one pre-boning trim area in the lamb boning room. This was identified by the audit leader and corrected before the day's audit activities were concluded, although the NZFA officials should have identified this deficiency in advance of this audit.

46 (A) On two occasions, lamb slaughter room operators were observed to fail to wash their hands with soap (using only water) after contaminating them through direct contact with fecal pellets. These were identified promptly by the lead auditor, who reinforced the need for improved personal hygiene with the establishment management officials.

58 Following the audit, the audit leader (the MAF-RA Unit Coordinator) recommended to his supervisors that the eligibility of this establishment to export to the United States be suspended, and reinstated only when the establishment management provides MAF with an acceptable management plan for the deficiencies identified, and can demonstrate, to MAF's satisfaction, that the plan is implemented and functioning effectively. Subsequently, one day later, MAF officials informed the FSIS auditor that a Notice of Intent to Delist in 30 days, if corrective actions are not taken, had been issued to the establishment management.

61. NAME OF AUDITOR
Gary D. Bolstad, DVM

Abc

62. AUDITOR SIGNATURE AND DATE

Donald C. [Signature]

7/7/03

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION AFFCO Ranguru Te Puke	2. AUDIT DATE 06/20/2003	3. ESTABLISHMENT NO. ME-56	4. NAME OF COUNTRY New Zealand
5. NAME OF AUDITOR(S) Dr. Gary D. Bolstad		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	

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

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements		Audit Results	Part D - Continued Economic Sampling		Audit Results
7. Written SSOP			33. Scheduled Sample		
8. Records documenting implementation.			34. Species Testing		
9. Signed and dated SSOP, by on-site or overall authority.			35. Residue		
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements			Part E - Other Requirements		
10. Implementation of SSOP's, including monitoring of implementation.			36. Export		
11. Maintenance and evaluation of the effectiveness of SSOP's.			37. Import		
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.			38. Establishment Grounds and Pest Control		
13. Daily records document item 10, 11 and 12 above.			39. Establishment Construction/Maintenance		X
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements			40. Light		X
14. Developed and implemented a written HACCP plan.			41. Ventilation		
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.			42. Plumbing and Sewage		
16. Records documenting implementation and monitoring of the HACCP plan.			43. Water Supply		
17. The HACCP plan is signed and dated by the responsible establishment individual.			44. Dressing Rooms/Lavatories		
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements			45. Equipment and Utensils		
18. Monitoring of HACCP plan.			46. Sanitary Operations		
19. Verification and validation of HACCP plan.			47. Employee Hygiene		
20. Corrective action written in HACCP plan.		X	48. Condemned Product Control		
21. Reassessed adequacy of the HACCP plan.			Part F - Inspection Requirements		
Part C - Economic / Wholesomeness			49. Government Staffing		
23. Labeling - Product Standards			50. Daily Inspection Coverage		
24. Labeling - Net Weights			51. Enforcement		X
25. General Labeling			52. Humane Handling		
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)			53. Animal Identification		
Part D - Sampling Generic E. coli Testing			54. Ante Mortem Inspection		
27. Written Procedures			55. Post Mortem Inspection		
28. Sample Collection/Analysis			Part G - Other Regulatory Oversight Requirements		
29. Records			56. European Community Directives		O
Salmonella Performance Standards - Basic Requirements			57. Monthly Review		
30. Corrective Actions			58.		
31. Reassessment			59.		
32. Written Assurance					

60. Observation of the Establishment

B 5b

Est. ME-56, AFFCO Rangiora, Te Puke, New Zealand, June 20, 2003.

20/51 The corrective actions to be taken in the event that critical limits are exceeded did not include reinspection of the product back to the last acceptable monitoring check. The NZFA officials should have identified this deficiency in advance of this audit. This finding was consistent in all the slaughter establishments audited, and the requirement was discussed in detail as a national issue during the exit meetings for the establishment and for the country as well.

39 Maintenance and cleaning of over-product structures had been neglected in several small areas. The NZFSA officials ordered prompt correction, although they should have identified this deficiency in advance of this audit.

40/51 Light was inadequate at the inspection surfaces of the anterior abdominal cavities and the medial retropharyngeal lymph nodes. The MAF officials ordered prompt correction, although they should have identified this deficiency in advance of this audit.

61. NAME OF AUDITOR
Garv D. Bolstad, DVM

Garv D. Bolstad

62. AUDITOR SIGNATURE AND DATE

Donald C. Mead

6/20/03

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Alliance Sockburn Sockburn	2. AUDIT DATE July 4, 2003	3. ESTABLISHMENT NO. ME-69	4. NAME OF COUNTRY New Zealand
5. NAME OF AUDITOR(S) Dr. Gary D. Bolstad		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	

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

	Audit Results		Audit Results
Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements		Part D - Continued Economic Sampling	
7. Written SSOP		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements		Part E - Other Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	X	36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements		40. Light	
14. Developed and implemented a written HACCP plan.		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	X
19. Verification and validation of HACCP plan.		47. Employee Hygiene	X
20. Corrective action written in HACCP plan.	X	48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		Part F - Inspection Requirements	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	X	49. Government Staffing	
Part C - Economic / Wholesomeness		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	X
24. Labeling - Net Weights		52. Humane Handling	
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	
Part D - Sampling Generic E. coli Testing		55. Post Mortem Inspection	
27. Written Procedures		Part G - Other Regulatory Oversight Requirements	
28. Sample Collection/Analysis		56. European Community Directives	O
29. Records		57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58. NCID	X
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

B. C-b

Est. ME-69, Alliance Sockburn; Sockburn, New Zealand; July 4, 2003.

10/46/51 (A) Maintenance and cleaning of hand-operated rail-gate handles had been neglected in the lamb carcass cooler: a buildup of black residue was observed. The lead auditor ordered prompt cleaning and a more frequent schedule of cleaning, as well increased monitoring during pre-operational sanitation inspection. (B) The major conveyor belt in the beef boning room was deteriorated and frayed, with numerous long strings. This had been identified for replacement, but not in a timely manner.

10/47a Condensation was observed on rails and over-product equipment in the beef carcass cooler. Some of the carcasses had been retained for trimming; others had not, until the lead auditor identified the problem and ordered retention and trimming of all the product in the cooler.

20/51 No consideration of product disposition, in the event that critical limits were exceeded, was included in the written HACCP plan, as required by both FSIS and MAF. Furthermore, the corrective actions to be taken in the event that critical limits are exceeded did not include reinspection of the product back to the last acceptable monitoring check. This (latter) finding was consistent in all the slaughter establishments audited; the requirement was discussed in detail as a national issue during the exit meetings for the establishment and for the country as well. The NZFSA officials should have identified this deficiency in advance of this audit.

22/51 The Pre-Shipment Document Review Form did not include an adequate description of the amount of product covered by the review. The NZFSA officials should have identified this deficiency in advance of this audit.

47b Several members of the audit team, being guided by an establishment official, did not wash their hands as required upon entering carcass coolers at the start of the day's audit. This was identified and corrected by the audit leader for the day.

47c Pre-boning trimmers were not using hand soap after trimming the beef quarters which had been potentially contaminated with condensation (see item 47b). This was identified by the FSIS auditor; the NZFSA officials ordered immediate corrective actions.

58 Following the discussion of the day's observations, the audit leader agreed to recommend the issuance of a Notice of Intent to Delist if the deficiencies identified were not corrected to the MAF officials' satisfaction within thirty days of this audit.

61. NAME OF AUDITOR	Gary D. Bolstad, DVM	62. AUDITOR SIGNATURE AND DATE	7/4/03
	FOR		

0-70

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Canterbury Meat Packers, Ltd. Blenheim	2. AUDIT DATE 06/30/2003	3. ESTABLISHMENT NO. ME-70	4. NAME OF COUNTRY New Zealand
5. NAME OF AUDITOR(S) Dr. Gary D. Bolstad		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	

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

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements		Part E - Other Requirements	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	O
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	X
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements		40. Light	
14. Developed and implemented a written HACCP plan.		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.	X	48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		Part F - Inspection Requirements	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
Part C - Economic / Wholesomeness		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	X
24. Labeling - Net Weights		52. Humane Handling	
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	
Part D - Sampling Generic E. coli Testing		55. Post Mortem Inspection	
27. Written Procedures		Part G - Other Regulatory Oversight Requirements	
28. Sample Collection/Analysis		56. European Community Directives	O
29. Records		57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

B-7b

Est. ME-70, Canterbury Meat Packers, Ltd., Blenheim, New Zealand; June 30, 2003.

20/51 The corrective actions to be taken in the event that critical limits are exceeded did not include reinspection of the product back to the last acceptable monitoring check. This finding was consistent in all the slaughter establishments audited; the requirement was discussed in detail as a national issue during the exit meetings for the establishment and for the country as well. The NZFSA officials should have identified this deficiency in advance of this audit.

39 Maintenance had been neglected in several areas: there was rust on over-product rails in the retained carcass cooler (this had been identified by the establishment and was scheduled for correction); house-keeping was poor in one small chemical store room, and dust was found in several amenities rooms.

NOTE: All deficiencies identified during the previous FSIS audit (April 29, 2002) had been adequately addressed and corrected.

61. NAME OF AUDITOR
Garv D. Bolstad, DVM

GB

62. AUDITOR SIGNATURE AND DATE

Donald Conrad

6/30/03

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Canterbury Meat Packers, Ltd. Seafield	2. AUDIT DATE July 2, 2003	3. ESTABLISHMENT NO. ME-78	4. NAME OF COUNTRY New Zealand
5. NAME OF AUDITOR(S) Dr. Gary D. Bolstad		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	

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

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements		Part E - Other Requirements	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements		40. Light	
14. Developed and implemented a written HACCP plan.		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.	X	48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		Part F - Inspection Requirements	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
Part C - Economic / Wholesomeness		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	X
24. Labeling - Net Weights		52. Humane Handling	
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	
Part D - Sampling Generic E. coli Testing		55. Post Mortem Inspection	
27. Written Procedures		Part G - Other Regulatory Oversight Requirements	
28. Sample Collection/Analysis		56. European Community Directives	O
29. Records		57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

B 8b

Est. ME-78, Canterbury Meat Packers, Ltd., Seafield (Ashburton), New Zealand; July 2, 2003.

20/51 The corrective actions to be taken in the event that critical limits are exceeded did not include reinspection of the product back to the last acceptable monitoring check. This finding was consistent in all the slaughter establishments audited; the requirement was discussed in detail as a national issue during the exit meetings for the establishment and for the country as well. The NZFSA officials should have identified this deficiency in advance of this audit.

61. NAME OF AUDITOR
Gary D. Bolstad, DVM

GB

62. AUDITOR SIGNATURE AND DATE

Donald C. Mead

7/2/03

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Richmond Waitotara Waitotara	2. AUDIT DATE 06/26-27/03	3. ESTABLISHMENT NO. ME-102	4. NAME OF COUNTRY New Zealand
5. NAME OF AUDITOR(S) Dr. Gary D. Bolstad		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	

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

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements		Part E - Other Requirements	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	X
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements		40. Light	
14. Developed and implemented a written HACCP plan.		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	X
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.	X	48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		Part F - Inspection Requirements	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
Part C - Economic / Wholesomeness		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	X
24. Labeling - Net Weights		52. Humane Handling	
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	
Part D - Sampling Generic E. coli Testing		55. Post Mortem Inspection	
27. Written Procedures		Part G - Other Regulatory Oversight Requirements	
28. Sample Collection/Analysis		56. European Community Directives	O
29. Records		57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

B-9b

Est. ME-102, Richmond Waitotara; Waitotara, New Zealand; June 25, 2003.

20/51 The corrective actions to be taken in the event that critical limits are exceeded did not include reinspection of the product back to the last acceptable monitoring check. This finding was consistent in all the slaughter establishments audited; the requirement was discussed in detail as a national issue during the exit meetings for the establishment and for the country as well. The NZFSA officials should have identified this deficiency in advance of this audit.

39/51 Cobwebs were found in several amenities areas; the Assessor ordered the establishment to provide a corrective action program in writing. The NZFSA officials should have identified this deficiency in advance of this audit.

44 There was inadequate separation of clean and street clothes in one of the thirteen lockers inspected. The establishment management gave assurances that a notice would be provided to all employees restating and reinforcing the policy and locker inspection frequency would be increased.

61. NAME OF AUDITOR
Garv D. Bolstad, DVM

GB

62. AUDITOR SIGNATURE AND DATE

Donald C. Smith

6/27/03

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Clover Export, Ltd. Mataura	2. AUDIT DATE July 4, 2003	3. ESTABLISHMENT NO. ME-117	4. NAME OF COUNTRY New Zealand
5. NAME OF AUDITOR(S) Dr. Gary D. Bolstad		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	

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

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	O
8. Records documenting implementation.		34. Species Testing	O
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	O
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements		Part E - Other Requirements	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	O
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements		40. Light	
14. Developed and implemented a written HACCP plan.		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.	X	48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		Part F - Inspection Requirements	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
Part C - Economic / Wholesomeness		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	X
24. Labeling - Net Weights		52. Humane Handling	
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	
Part D - Sampling Generic E. coli Testing		55. Post Mortem Inspection	
27. Written Procedures	O	Part G - Other Regulatory Oversight Requirements	
28. Sample Collection/Analysis	O	56. European Community Directives	O
29. Records	O	57. Monthly Review	O
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions	O	59.	
31. Reassessment	O		
32. Written Assurance	O		

60. Observation of the Establishment:

B-1Cb

Est. ME-117; Clover Exports, Ltd, Gore, New Zealand; July 14, 2003.

20/51 The corrective actions to be taken in the event that critical limits are exceeded did not include reinspection of the product back to the last acceptable monitoring check. This finding was consistent in all the slaughter establishments audited; the requirement was discussed in detail as a national issue during the exit meetings for the establishment and for the country as well. The NZFSA officials should have identified this deficiency in advance of this audit.

NOTE: This was not an official audit. The establishment was not officially listed as eligible to export to the U.S. at the time the random establishment selection was made. It was visited in anticipation of the forthcoming requirement for ratite establishments wishing to export to the U.S. to achieve equivalence to the Poultry Products Inspection Act, the deadline for which has been extended to October 1, 2003. As a result, implementation of a HACCP program was not yet mandatory in this establishment at the time of this audit. Only ostrich meat is exported to the U.S from this establishment.

61. NAME OF AUDITOR
Gary D. Bolstad, DVM

for

62. AUDITOR SIGNATURE AND DATE

Donald C. Smart

7/14/03

B-120

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Greenlea Premier Meats, Ltd Hamilton, NZ	2. AUDIT DATE 06/19/2003	3. ESTABLISHMENT NO. ME-124	4. NAME OF COUNTRY New Zealand
5. NAME OF AUDITOR(S) Dr. Gary D. Bolstad		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	

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

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	O
8. Records documenting implementation.		34. Species Testing	O
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	O
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements		Part E - Other Requirements	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements		40. Light	
14. Developed and implemented a written HACCP plan.		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	X
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.	X	48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		Part F - Inspection Requirements	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
Part C - Economic / Wholesomeness		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	X
24. Labeling - Net Weights		52. Humane Handling	
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	
Part D - Sampling Generic E. coli Testing		55. Post Mortem Inspection	
27. Written Procedures		Part G - Other Regulatory Oversight Requirements	
28. Sample Collection/Analysis		56. European Community Directives	O
29. Records		57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

B-12b

Est. ME-124, Greenlea Premier Meats, Ltd., Hamilton, New Zealand; June 19, 2003.

20/51 The corrective actions to be taken in the event that critical limits are exceeded did not include reinspection of the product back to the last acceptable monitoring check. This finding was consistent in all the slaughter establishments audited; the requirement was discussed in detail as a national issue during the exit meetings for the establishment and for the country as well. The NZFSA officials should have identified this deficiency in advance of this audit.

44 One set of street clothes was found in the area reserved for work clothes, and one set of work clothes was not in the designated area. The lead auditor identified this and ordered immediate correction.

61. NAME OF AUDITOR

Garv D. Bolstad, DVM

for

62. AUDITOR SIGNATURE AND DATE

Garv D. Bolstad

6/19/03

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Progressive Meats, Ltd. Hastings	2. AUDIT DATE 06/25/2003	3. ESTABLISHMENT NO. PH-71	4. NAME OF COUNTRY New Zealand
5. NAME OF AUDITOR(S) Dr. Gary D. Bolstad		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	

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

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements		Audit Results	Part D - Continued Economic Sampling		Audit Results
7. Written SSOP			33. Scheduled Sample		O
8. Records documenting implementation.			34. Species Testing		O
9. Signed and dated SSOP, by on-site or overall authority.			35. Residue		O
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements			Part E - Other Requirements		
10. Implementation of SSOP's, including monitoring of implementation.			36. Export		
11. Maintenance and evaluation of the effectiveness of SSOP's.			37. Import		
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.			38. Establishment Grounds and Pest Control		
13. Daily records document item 10, 11 and 12 above.			39. Establishment Construction/Maintenance		
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements			40. Light		
14. Developed and implemented a written HACCP plan.			41. Ventilation		
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.			42. Plumbing and Sewage		
16. Records documenting implementation and monitoring of the HACCP plan.			43. Water Supply		
17. The HACCP plan is signed and dated by the responsible establishment individual.			44. Dressing Rooms/Lavatories		
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements			45. Equipment and Utensils		
18. Monitoring of HACCP plan.			46. Sanitary Operations		X
19. Verification and validation of HACCP plan.			47. Employee Hygiene		
20. Corrective action written in HACCP plan.			48. Condemned Product Control		
21. Reassessed adequacy of the HACCP plan.			Part F - Inspection Requirements		
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.			49. Government Staffing		
Part C - Economic / Wholesomeness			50. Daily Inspection Coverage		
23. Labeling - Product Standards			51. Enforcement		
24. Labeling - Net Weights			52. Humane Handling		O
25. General Labeling			53. Animal Identification		O
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)			54. Ante Mortem Inspection		O
Part D - Sampling Generic E. coli Testing			55. Post Mortem Inspection		O
27. Written Procedures		O	Part G - Other Regulatory Oversight Requirements		
28. Sample Collection/Analysis		O	56. European Community Directives		O
29. Records		O	57. Monthly Review		
Salmonella Performance Standards - Basic Requirements			58.		
30. Corrective Actions		O	59.		
31. Reassessment		O			
32. Written Assurance		O			

60. Observation of the Establishment

B-136

Est. PH-71, Progressive Meats, Ltd., Hastings, New Zealand; June 25, 2003.

46 A small piece of fecal contamination was identified (by the boning room foreman) on a lamb carcass that had passed the pre-cutting trim station. Immediate appropriate corrective actions were implemented, including reinspection of all product in the boning room that had been processed since the last break and adding a new pre-boning trimmer.

61. NAME OF AUDITOR
Garv D. Bolstad, DVM

Garv

62. AUDITOR SIGNATURE AND DATE

Donald C. Smith

6/25/03

Bohler

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Lamb Packers Feilding, Ltd Feilding	2. AUDIT DATE June 13, 2003	3. ESTABLISHMENT NO. PH-367	4. NAME OF COUNTRY New Zealand
5. NAME OF AUDITOR(S) Dr. Gary D. Bolstad		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	

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

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	O
8. Records documenting implementation.		34. Species Testing	O
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	O
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements		Part E - Other Requirements	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements		40. Light	
14. Developed and implemented a written HACCP plan.		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		Part F - Inspection Requirements	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
Part C - Economic / Wholesomeness		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	
24. Labeling - Net Weights		52. Humane Handling	O
25. General Labeling		53. Animal Identification	O
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	O
Part D - Sampling Generic E. coli Testing		55. Post Mortem Inspection	O
27. Written Procedures	O	Part G - Other Regulatory Oversight Requirements	
28. Sample Collection/Analysis	O	56. European Community Directives	O
29. Records	O	57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions	O	59.	
31. Reassessment	O		
32. Written Assurance	O		

60. Observation of the Establishment

B-14b

Est. PH-367, Lamb Packers Feilding. Ltd; Feilding, New Zealand; June 13, 2003.

No comments were necessary.

61. NAME OF AUDITOR

Garv D. Bolstad, DVM

for

62. AUDITOR SIGNATURE AND DATE

Garv D. Bolstad

6/13/03

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Bernard Matthews NZ Ltd Gisborne	2. AUDIT DATE 06/23/2003	3. ESTABLISHMENT NO. PH-533	4. NAME OF COUNTRY New Zealand
5. NAME OF AUDITOR(S) Dr. Gary D. Bolstad		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	

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

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	O
8. Records documenting implementation.		34. Species Testing	O
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	O
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements		Part E - Other Requirements	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements		40. Light	
14. Developed and implemented a written HACCP plan.		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		Part F - Inspection Requirements	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
Part C - Economic / Wholesomeness		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	
24. Labeling - Net Weights		52. Humane Handling	O
25. General Labeling		53. Animal Identification	O
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	O
Part D - Sampling Generic E. coli Testing		55. Post Mortem Inspection	O
27. Written Procedures	O	Part G - Other Regulatory Oversight Requirements	
28. Sample Collection/Analysis	O	56. European Community Directives	O
29. Records	O	57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions	O	59.	
31. Reassessment	O		
32. Written Assurance	O		

60. Observation of the Establishment

B-15b

Est. PH-533, Bernard Matthews NZ Ltd, Gisborne, New Zealand; June 23, 2003.

No comments were necessary.

61. NAME OF AUDITOR
Garv D. Bolstad, DVM

for

62. AUDITOR SIGNATURE AND DATE

Donald Conrad

6/23/03

Ref: M-USA000

08 December 2003

Sally Stratmoen, Esquire
Director, International Equivalence Staff
Office of International Affairs
Food Safety Inspection Service
Room 2137-South Building
U.S. Department of Agriculture
Washington DC, 20250
UNITED STATES OF AMERICA

Dear Sally

Response to Final Audit Report

Thank you for the opportunity of responding to the Draft Final Audit Report for the FSIS Inspection 12 June to 18 July 2003 and your letter that accompanied that report dated 14 October 2003.

Firstly, I would like to express our overall satisfaction at the general conclusions of the audit report and acknowledge them as being a true reflection of the performance of the New Zealand programme.

New Zealand has already addressed the majority of issues noted in the report and has at an earlier date supplied information with regard to the corrective actions and verification thereof for the deficiencies in the two establishments that were issued with 30-day letters of intent-to-delist. With regard to the comments under the third bullet point of your letter, the New Zealand Food Safety Authority has initiated a process of review of the handling of zero faecal tolerance with the Meat Industry Association Technical Committee. We have historically applied a statistical approach to zero faecal tolerance but we intend to revisit this approach, particularly the corrective action procedures, to see if we can come up with a more "acceptable and practical" solution for all. While New Zealand has been comfortable with the outcomes of this approach, it has caused problems in the latest audit, particularly with regard to corrective action procedures.

Some general comments that are primarily provided to make minor corrections to the report are attached as Appendix I.

Should you have any questions with regard to this letter I would be happy to discuss them with you. Please advise me in the first instance by e-mail at tony.zohrab@nzfsa.govt.nz so that we can arrange a convenient time for a telephone call.

Yours Sincerely

Dr Tony Zohrab
Director (Animal Products)

NZFSA Comment on the Draft Final Audit Report

12 June to 18 July 2003

The comments provided below are provided to assist with the accuracy.

1. ABBREVIATION AND SPECIAL TERMS USED IN THE REPORT

CIG - Remove the "s" from "Investigations".

2. OBJECTIVE OF THE AUDIT

- NZFSA - Remove the "s" from "Investigations".

3. MAIN FINDINGS

6.1.1CCA Control Systems

There is some confusion with regard to functional groups. Within NZFSA there are a number of Directors. For the purposes of this report there is the Compliance and Investigation Group who conduct audits on behalf the Director (Animal Products) and report through their Director to the Director (Animal Products). The Director (Animal Products) heads the Animal Products Group which has Assistant Directorships for Operations, Animal Product Standards, Market Access, and Monitoring and Review.

The wider MAF has an Operations Group that includes the MAF Verification Agency (MAF VA). MAF VA conduct verification activities at establishments on behalf of the Director (Animal Products). The Agency Technical Manager is directly accountable to the Director (Animal Products).

Line 4, remove the "s" from "Investigations". (We suggest that a search on this word throughout the document would be worthwhile).

Last paragraph, third sentence, should refer to "Four of the eighteen ASURE managers..".

6.1.2 Ultimate Control and Supervision

Second paragraph should read: " New technical information that is New Zealand law for domestic purposes, is issued by specification under the Animal Products Act 1999. New information that is over and above the New Zealand domestic law requirements, is legally notified under the Act and distributed to all meat inspection employees in the form of Overseas Market Access Requirements (OMARs) and General Requirements for Export (GREX). There are also a number of Technical Directives (TDs) that have been carried over from the former Meat Act regime that have been given the full effect of law under the Animal Products Act 1999.

With respect to ante-mortem and post-mortem specifications these are notified via specification and distributed to ASURE staff in the form of manuals."

Paragraph 5: second line: "...of all government, including ASURE employees...".

6.3.1 Audits of Regional Inspection Offices

NZFSA in the first line should refer to "MAF VA".

GENERAL COMMENTS

There are references throughout the report to the effect that NZFSA officials should have identified a particular deficiency. This comment is relevant if the CIG auditor overlooked a deficiency during the current audit. However, the context of many references to deficiencies should refer to MAF VA not having identified them as the CIG auditors are not based in the establishment like the MAF VA Technical Supervisor who has accountability for standards at an establishment. An example is the ME 34 establishment report, 39/51.

There is at least one reference to MAF RA Unit Co-ordinator (ME 34, 58) which should be MAF VA.