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State Veterinary Service

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

22 November 2000

Dear Mr Manis

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

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

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

Laboratory audits

1. Regarding the absence of an intra-laboratory check sample programme at the Laboratory of the Government Chemist (LGC), Mr Ray Anderson, Director of Policy of the MAFF Veterinary Medicines Directorate (VMD) - which has responsibility for the UK national residue surveillance scheme (NSS) - has pointed out that the LGC is required under its contract with VMD to participate in the Food Analysis Performance Assessment Scheme (FAPAS), an internationally recognised proficiency test scheme and to copy the FAPAS results to VMD. LCG also participates in ring trials organised by EU reference laboratories. In addition, VMD is now considering the implementation of a check sample programme within LCG.

2. Regarding the time taken to analyse and report on samples, Mr Anderson comments that the NSS is designed to meet the requirements of European Community Directive 96/23/EC. This directive does not specify a time limit for the screening of samples, and the throughput time may depend on factors such as the batching of frozen samples for a particular type of analysis. The NSS is a large scale monitoring exercise and, as such, carcases are not routinely held at abattoirs pending the outcome of residue tests. However,

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

Basic establishment facilities

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

Cross-contamination

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

Product handling and storage

1. At establishment MK020[1] inspection and, where necessary, rejection of meat intended for grinding has been reviewed; as have the protective covering of meat in transit and the use of wooden pallets.
2. At establishment 2060, structural action is being taken to prevent overhead condensation forming in the 'product zone' in carcase chillers or processing lines.

Personnel hygiene and practices

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

Inspection system controls

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

Species verification

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

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

Monthly reviews

1. Supervisory visits are made to all establishments eligible to export to the USA and written reports submitted to this office. Establishments which are actively exporting (ie, 2060 and 2205) receive monthly supervisory visits from a POVS[2] and annual audit visits from a VMHA[3]. The requirement for supervisory visits to establishments which are not actively exporting is met by annual VMHA audits. Should any problems occur at an approved establishment, further POVS and/or VMHA visits would be scheduled as required.
2. As regards establishment 2182 : this was first approved for US trade on 20 July 1999 but, at the time of the FSIS audit on 12 May, had not been involved in exports to the USA. Our understanding was, therefore, that a supervisory visit was due by 21 July 2000., and a VMHA annual audit has subsequently been carried out.

Establishment 5049 : Bernard Matthews Foods Limited, Halesworth

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

General

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

Matters for clarification

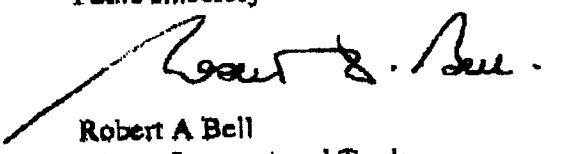
We should be grateful for guidance on the following questions, which arose during the visit:

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

[2] Principal Official Veterinary Surgeon - employed by the Meat Hygiene Service.
[3] Veterinary Meat Hygiene Adviser - employed by the Food Standards Agency.

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

Yours sincerely



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