F-1a

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE INTERNATIONAL PROGRAMS **FOREIGN PLANT REVIEW FORM**	REVIEW DATE 8/20/2001	ESTABLISHMENT NO. AND NAME 10 - Atra Oyj	CITY Kuopio COUNTRY Finland
NAME OF REVIEWER Dr. Gary D. Bolstad	NAME OF FOREIGN OFFICIAL Drs. Anna-Maija Grönlund, Paavo Miettinen	EVALUATION [X] Acceptable [ ] Acceptable/ Re-review [ ] Unacceptable	

CODES (Give an appropriate code for each review item listed below)
A = Acceptable M = Marginally Acceptable U = Unacceptable N = Not Reviewed O = Does not apply

1. CONTAMINATION CONTROL		Cross contamination prevention	28 A	Formulations	55 A
(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing	29 A	Packaging materials	56 A
Water potability records	01 A	Product handling and storage	30 M	Laboratory confirmation	57 A
Chlorination procedures	02 O	Product reconditioning	31 A	Label approvals	58 A
Back siphonage prevention	03 A	Product transportation	32 A	Special label claims	59 O
Hand washing facilities	04 A	**(d) ESTABLISHMENT SANITATION PROGRAM**		Inspector monitoring	60 A
Sanitizers	05 A	Effective maintenance program	33 A	Processing schedules	61 O
Establishments separation	06 A	Preoperational sanitation	34 A	Processing equipment	62 A
Pest --no evidence	07 A	Operational sanitation	35 A	Processing records	63 O
Pest control program	08 A	Waste disposal	36 A	Empty can inspection	64 O
Pest control monitoring	09 A	**2. DISEASE CONTROL**		Filling procedures	65 O
Temperature control	10 A	Animal identification	37 A	Container closure exam	66 O
Lighting	11 A	Antemortem inspec. procedures	38 A	Interim container handling	67 O
Operations work space	12 A	Antemortem dispositions	39 A	Post-processing handling	68 A
Inspector work space	13 A	Humane Slaughter	40 A	Incubation procedures	69 O
Ventilation	14 A	Postmortem inspec. procedures	41 A	Process. defect actions -- plant	70 A
Facilities approval	15 A	Postmortem dispositions	42 A	Processing control -- inspection	71 A
Equipment approval	16 A	Condemned product control	43 A	**5. COMPLIANCE/ECON. FRAUD CONTROL**	
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control	44 A	Export product identification	72 A
Over-product ceilings	17 M	Returned and rework product	45 A	Inspector verification	73 A
Over-product equipment	18 M	**3. RESIDUE CONTROL**		Export certificates	74 A
Product contact equipment	19 A	Residue program compliance	46 A	Single standard	75 A
Other product areas *(inside)*	20 A	Sampling procedures	47 A	Inspection supervision	76 M
Dry storage areas	21 A	Residue reporting procedures	48 A	Control of security items	77 A
Antemortem facilities	22 A	Approval of chemicals, etc.	49 A	Shipment security	78 A
Welfare facilities	23 A	Storage and use of chemicals	50 A	Species verification	79 O
Outside premises	24 A	**4. PROCESSED PRODUCT CONTROL**		"Equal to" status	80 A
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim	51 A	Imports	81 A
Personal dress and habits	25 A	Boneless meat reinspection	52 A	HACCP	82
Personal hygiene practices	26 M	Ingredients identification	53 A	SSOPs	83
Sanitary dressing procedures	27 A	Control of restricted ingredients	54 A		

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FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE	ESTABLISHMENT NO. AND NAME	CITY
	8/20/2001	10 - Atra Oyj	Kuopio
			COUNTRY Finland

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL	EVALUATION
Dr. Gary D. Bolstad	Drs. Anna-Maija Grönlund, Paavo Miettinen	[X] Acceptable [ ] Acceptable/ Re-review [ ] Unacceptable

COMMENTS:

17 In the quartering area, a buildup of crystalline residues had formed along a crack in the ceiling above a product traffic area. Only vacuum-packed product was handled in the area; corrective actions were immediate and adequate.

18/30 Condensation had formed over exposed carcasses in two coolers (none was seen to be dripping). Corrective actions were effective for the majority of the exposed product; new carcasses were positioned under one of the problem areas, but no product was seen to be affected before effective corrective actions were taken.

26 An edible-product worker contaminated her hands by handling a foot switch, then continued working with product. NFA ordered immediate and appropriate corrective actions.

NOTE: All deficiencies previously identified during FSIS audits had been adequately addressed and corrected.

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U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE INTERNATIONAL PROGRAMS **FOREIGN PLANT REVIEW FORM**	REVIEW DATE 8/22/2001	ESTABLISHMENT NO. AND NAME 18 -- HK Ruokatalo Oy	CITY Forssa COUNTRY Finland
NAME OF REVIEWER Dr. Gary D. Bolstad	NAME OF FOREIGN OFFICIAL Drs. A.-M.Grönlund, Inna Ilivitzky, Timo Laita	EVALUATION [X] Acceptable [ ] Acceptable/ Re-review [ ] Unacceptable	

CODES (Give an appropriate code for each review item listed below)
A = Acceptable M = Marginally Acceptable U = Unacceptable N = Not Reviewed O = Does not apply

1. CONTAMINATION CONTROL		Cross contamination prevention	28 A	Formulations	55 A
(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing	29 A	Packaging materials	56 A
Water potability records	01 A	Product handling and storage	30 M	Laboratory confirmation	57 A
Chlorination procedures	02 O	Product reconditioning	31 A	Label approvals	58 A
Back siphonage prevention	03 A	Product transportation	32 A	Special label claims	59 O
Hand washing facilities	04 A	**(d) ESTABLISHMENT SANITATION PROGRAM**		Inspector monitoring	60 A
Sanitizers	05 A	Effective maintenance program	33 A	Processing schedules	61 O
Establishments separation	06 A	Preoperational sanitation	34 A	Processing equipment	62 A
Pest --no evidence	07 A	Operational sanitation	35 A	Processing records	63 A
Pest control program	08 A	Waste disposal	36 A	Empty can inspection	64 O
Pest control monitoring	09 A	**2. DISEASE CONTROL**		Filling procedures	65 O
Temperature control	10 A	Animal identification	37 A	Container closure exam	66 O
Lighting	11 M	Antemortem inspec. procedures	38 A	Interim container handling	67 O
Operations work space	12 A	Antemortem dispositions	39 A	Post-processing handling	68 A
Inspector work space	13 A	Humane Slaughter	40 A	Incubation procedures	69 O
Ventilation	14 A	Postmortem inspec. procedures	41 A	Process. defect actions -- plant	70 A
Facilities approval	15 A	Postmortem dispositions	42 A	Processing control -- inspection	71 A
Equipment approval	16 A	Condemned product control	43 A	**5. COMPLIANCE/ECON. FRAUD CONTROL**	
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control	44 A	Export product identification	72 A
Over-product ceilings	17 A	Returned and rework product	45 A	Inspector verification	73 A
Over-product equipment	18 M	**3. RESIDUE CONTROL**		Export certificates	74 A
Product contact equipment	19 A	Residue program compliance	46 A	Single standard	75 A
Other product areas *(inside)*	20 A	Sampling procedures	47 A	Inspection supervision	76 A
Dry storage areas	21 A	Residue reporting procedures	48 A	Control of security items	77 A
Antemortem facilities	22 A	Approval of chemicals, etc.	49 A	Shipment security	78 A
Welfare facilities	23 A	Storage and use of chemicals	50 A	Species verification	79 O
Outside premises	24 A	**4. PROCESSED PRODUCT CONTROL**		"Equal to" status	80 A
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim	51 A	Imports	81 O
Personal dress and habits	25 A	Boneless meat reinspection	52 A	HACCP	82 A*
Personal hygiene practices	26 A	Ingredients identification	53 A	SSPOs	83 A
Sanitary dressing procedures	27 A	Control of restricted ingredients	54 O		

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FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE	ESTABLISHMENT NO. AND NAME	CITY
	8/22/2001	18 -- HK Ruokatalo Oy	Forssa
			COUNTRY Finland

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL	EVALUATION
Dr. Gary D. Bolstad	Drs. A.-M.Grönlund, Inna Ilivitzky, Timo Laita	[X] Acceptable [ ] Acceptable/ Re-review [ ] Unacceptable

COMMENTS:

11 EC Directives require an intensity of 540 Lux (50 foot-candles) of light at inspection surfaces. The Auditor measured 330 Lux in abdominal cavities. Management agreed to install new lighting.

18 A motor housing directly over exposed product in the edible offal preparation room was observed with heavy accumulations of old rust and flaking paint. NFA officials ordered prompt replacement.

30 Containers of edible product were stored directly on wooden pallets. Management officials agreed to implement a policy promptly to correct this.

(82 There was a CCP for plastic-bagging the bung but not for evisceration. This was corrected immediately. The plan was verified, but the documentation of the verification needed improvement. The HACCP-trained establishment employee had recently left the establishment's employment; they were seeking another.)

F-3a

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE INTERNATIONAL PROGRAMS **FOREIGN PLANT REVIEW FORM**	REVIEW DATE 8/27/2001	ESTABLISHMENT NO. AND NAME 22 - Atria Oy	CITY Nurmo COUNTRY Finland
NAME OF REVIEWER Dr. Gary D. Bolstad	NAME OF FOREIGN OFFICIAL Drs. A-M Grönlund,Heikki Takala, Eeva Japisson	EVALUATION [X] Acceptable [ ] Acceptable/ Re-review [ ] Unacceptable	

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Chlorination procedures	02 O	Product reconditioning	31 A	Label approvals	58 A
Back siphonage prevention	03 A	Product transportation	32 N	Special label claims	59 O
Hand washing facilities	04 A	**(d) ESTABLISHMENT SANITATION PROGRAM**		Inspector monitoring	60 A
Sanitizers	05 M	Effective maintenance program	33 M	Processing schedules	61 O
Establishments separation	06 A	Preoperational sanitation	34 A	Processing equipment	62 A
Pest --no evidence	07 A	Operational sanitation	35 A	Processing records	63 A
Pest control program	08 A	Waste disposal	36 A	Empty can inspection	64 O
Pest control monitoring	09 A	**2. DISEASE CONTROL**		Filling procedures	65 O
Temperature control	10 A	Animal identification	37 A	Container closure exam	66 O
Lighting	11 M	Antemortem inspec. procedures	38 A	Interim container handling	67 O
Operations work space	12 A	Antemortem dispositions	39 A	Post-processing handling	68 A
Inspector work space	13 A	Humane Slaughter	40 A	Incubation procedures	69 O
Ventilation	14 A	Postmortem inspec. procedures	41 A	Process. defect actions -- plant	70 A
Facilities approval	15 A	Postmortem dispositions	42 A	Processing control -- inspection	71 A
Equipment approval	16 A	Condemned product control	43 A	**5. COMPLIANCE/ECON. FRAUD CONTROL**	
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control	44 A	Export product identification	72 A
Over-product ceilings	17 A	Returned and rework product	45 A	Inspector verification	73 A
Over-product equipment	18	**3. RESIDUE CONTROL**		Export certificates	74 A
Product contact equipment	19	Residue program compliance	46 A	Single standard	75 A
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Welfare facilities	23 M	Storage and use of chemicals	50 A	Species verification	79 O
Outside premises	24 A	**4. PROCESSED PRODUCT CONTROL**		"Equal to" status	80 A
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim	51 A	Imports	81 A
Personal dress and habits	25 A	Boneless meat reinspection	52 A	HACCP	82 M
Personal hygiene practices	26 A	Ingredients identification	53 A	SSOPs	83 A
Sanitary dressing procedures	27 A	Control of restricted ingredients	54 A		

F-3b

FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE 8/27/2001	ESTABLISHMENT NO. AND NAME 22 - Atria Oy	CITY Nurmo / COUNTRY Finland
NAME OF REVIEWER Dr. Gary D. Bolstad	NAME OF FOREIGN OFFICIAL Drs. A-M Grönlund,Heikki Takala, Eeva Japisson	EVALUATION [X] Acceptable [ ] Acceptable/ Re-review [ ] Unacceptable	

COMMENTS:

05 Many sterilizers had guards that suspended the knives so that not the entire knife blades would contact the hot water. Management gave assurances this would be promptly rectified.

11 EC Directives require an intensity of 540 Lux (fifty foot-candles) of shadow-free light at inspection surfaces. The auditor measured 440 Lux in the viscera trays. Management agreed to intall additional lighting.

19, 33 Numerous cracked stainless-steel combo bins (in use) were in need of repair or replacement. Management gave assurances they would receive the necessary attention promptly.

23 The door to a toilet entered directly into a production area. This is specifically forbidden by European Commission Directive. The door was immediately sealed.

76 There had been no internal review during July 2001 (product was exported to the U.S. during that month).

82 A form for pre-shipment document reviews had been developed but was not yet implemented. Its use was begun on the day of the audit.

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U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE INTERNATIONAL PROGRAMS **FOREIGN PLANT REVIEW FORM**	REVIEW DATE 8/16/2001	ESTABLISHMENT NO. AND NAME 62 - Oy Snellman AB	CITY Pietarsaari COUNTRY Finland
NAME OF REVIEWER Dr. Gary D. Bolstad	NAME OF FOREIGN OFFICIAL Dr. Eeva Japisson; Dr. Riita Mangs	EVALUATION ☐ Acceptable ☒ Acceptable/ Re-review ☐ Unacceptable	

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Chlorination procedures	02 O	Product reconditioning	31 A	Label approvals	58 O
Back siphonage prevention	03 A	Product transportation	32 N	Special label claims	59 O
Hand washing facilities	04 A	**(d) ESTABLISHMENT SANITATION PROGRAM**		Inspector monitoring	60 A
Sanitizers	05 A	Effective maintenance program	33 A	Processing schedules	61 O
Establishments separation	06 A	Preoperational sanitation	34 A	Processing equipment	62 A
Pest --no evidence	07 A	Operational sanitation	35 A	Processing records	63 A
Pest control program	08 A	Waste disposal	36 A	Empty can inspection	64 O
Pest control monitoring	09 A	**2. DISEASE CONTROL**		Filling procedures	65 O
Temperature control	10 A	Animal identification	37 A	Container closure exam	66 O
Lighting	11 M	Antemortem inspec. procedures	38 A	Interim container handling	67 O
Operations work space	12 A	Antemortem dispositions	39 A	Post-processing handling	68 A
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Ventilation	14 A	Postmortem inspec. procedures	41 A	Process. defect actions -- plant	70 A
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Equipment approval	16 A	Condemned product control	43 M	**5. COMPLIANCE/ECON. FRAUD CONTROL**	
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control	44 A	Export product identification	72 A
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Over-product equipment	18 A	**3. RESIDUE CONTROL**		Export certificates	74 A
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Welfare facilities	23 A	Storage and use of chemicals	50 A	Species verification	79 O
Outside premises	24 A	**4. PROCESSED PRODUCT CONTROL**		"Equal to" status	80 A
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim	51 A	Imports	81 A
Personal dress and habits	25 A	Boneless meat reinspection	52 O	HACCP	82 M
Personal hygiene practices	26 A	Ingredients identification	53 A	SSOPs	83 A
Sanitary dressing procedures	27 M	Control of restricted ingredients	54 O		

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FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE	ESTABLISHMENT NO. AND NAME	CITY
	8/16/2001	62 - Oy Snellman AB	Pietarsaari
			COUNTRY Finland

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL	EVALUATION
Dr. Gary D. Bolstad	Dr. Eeva Japisson; Dr. Riita Mangs	☐ Acceptable ☒ Acceptable/ Re-review ☐ Unacceptable

COMMENTS:

11 Lighting was inadequate at the inspection surfaces of the swine mandibular lymph nodes: the intensity was 440 Lux; 540 Lux (50 foot-candles) are required by EC Directive. Management agreed to install additional light promptly.

17 Numerous drips from various areas of the ceiling in and near a carcass corridor indicated a leak in the space above and splashed onto exposed carcasses below. The affected product was immediately identified for reinspection and trimming and the area was blocked from use by the estabishment pending correction.

27 Two operators were observed not to wash their hands with soap after contaminating them during the dressing procedure before continuing working with exposed product. The establishment management took immediate corrective actions.

28 Beef shanks were observed to contact the eviscerator's platform. The Veterinarian-In-Charge ordered sanitization of the common-contact surface between carcasses until the common contact could be prevented.

29 The splitting saw was not sterilized between carcasses. This had been identified by the Veterinarian-In-Charge; she ordered installation of sterilizing equipment. It was to be installed within one month at most; in the meantime any contamination resulting from common contact of the saw with subsequent carcasses will result in immediate corrective action.

43 There was no denaturing of animals condemned upon ante-mortem inspection or dead on arrival, or of carcasses condemned on the slaughter floor. This was a repeat finding.

76 There were no supervisory visits during November or December 2000 or February, March, May, or July 2001. The requirement had been misunderstood by NFA: The previous FSIS auditor had stated that the internal reviews should be conducted every second month. The Director of the meat inspection system gave his assurance that the visits would be monthly as of the time of this audit during any month when the establishment produced product that would be eligible for inclusion in the U.S. export chain.

82 This establishment had developed an "own control" program that approximated most of the HACCP requirements. There were two action plans for each hazard identified, but they were not called HACCP plans, and the hazards were not termed "CCPs." There were no pre-shipment document reviews. The NFA officials ordered the establishment management to modify the program into a HACCP program per se, and the plant manager agreed to do so within two weeks of this audit; in the meantime, until all HACCP requirements were met, NFA ordered that no products from this establishment would enter the U.S.-eligible export chain. NOTE: Both NFA officials and establishment management officials stated that the previous FSIS auditor had informed them that it was not necessary to designate the hazards as CCPS, the tolerances as Critical Limits, or the action plans as HACCP plans.

FOLLOW-UP: NFA officials provided a copy of the newly-developed HACCP program on August 28. The Auditor determined that it meet the basic requirements.

F-5a

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE INTERNATIONAL PROGRAMS **FOREIGN PLANT REVIEW FORM**	REVIEW DATE 8/21/2001	ESTABLISHMENT NO. AND NAME 74 Pouttu Foods Oy	CITY Outokumpu COUNTRY Finland
NAME OF REVIEWER Dr. Gary D. Bolstad	NAME OF FOREIGN OFFICIAL Dr. Anna-Maija Grönlund, Dr. Pauli Sorvisto	EVALUATION ☐ Acceptable ☐ Acceptable/ Re-review ☒ Unacceptable	

CODES (Give an appropriate code for each review item listed below)
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1. CONTAMINATION CONTROL		Cross contamination prevention	28 M	Formulations	55 O
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Sanitizers	05 M	Effective maintenance program	33 A	Processing schedules	61 O
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Pest control monitoring	09 A	**2. DISEASE CONTROL**		Filling procedures	65 O
Temperature control	10 A	Animal identification	37 A	Container closure exam	66 O
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Inspector work space	13 A	Humane Slaughter	40 A	Incubation procedures	69 O
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Facilities approval	15 A	Postmortem dispositions	42 A	Processing control -- inspection	71 O
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Welfare facilities	23 A	Storage and use of chemicals	50 A	Species verification	79 O
Outside premises	24 A	**4. PROCESSED PRODUCT CONTROL**		"Equal to" status	80 U
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim	51 M	Imports	81 A
Personal dress and habits	25 A	Boneless meat reinspection	52 N	HACCP	82 U
Personal hygiene practices	26 U	Ingredients identification	53 O	SSOPs	83 M
Sanitary dressing procedures	27 U	Control of restricted ingredients	54 O		

F-5b

FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE 8/21/2001	ESTABLISHMENT NO. AND NAME 74 Pouttu Foods Oy	CITY Outokumpu COUNTRY Finland
NAME OF REVIEWER Dr. Gary D. Bolstad	NAME OF FOREIGN OFFICIAL Dr. Anna-Maija Grönlund, Dr. Pauli Sorvisto	EVALUATION ☐ Acceptable ☐ Acceptable/ Re-review ☒ Unacceptable	

COMMENTS:

05 The majority of the sterilizers on the slaughter floor had water levels that were below the knife suspension devices, with the result that parts of the knife blades were not adequately sterilized. Partial corrective action was taken, but it did not address all of the affected sterilizers (the sterilizer at the post-mortem inspection station remained deficient) until the Auditor pointed out the need.

11 Lighting was inadequate at the post-mortem inspection stations. An intensity of 540 Lux (fifty foot-candles) of light is required, by EC Directive, on inspection surfaces. The Auditor measured the following intensities: 220 Lux in abdominal cavities, 110 Lux on some of the surfaces of the liver, and 55Lux on the incised masseter muscles.

26, 27, 29 The first legging trimmer was observed to fail to sterilize his knife blade between opening cuts in the heavily-soiled skin of the hocks and the perianal area; he also routinely contaminated the outside of the plastic bag used to cover the rectum through contact with the perianal skin. The same operator routinely failed to use hand soap after contaminating his hands through contact with the skin before continuing his skinning procedures. Corrective actions were inadequate: When the Auditor pointed out these sanitary dressing and personal hygiene deficiencies to the NFA personnel, they informed the establishment management, who spoke with the operator to correct the problem. When the Auditor again observed the operator at work later during the audit, the same sanitary dressing deficiencies were being repeated.

28 Many carcasses were observed to have common contact with equipment at the evisceration and pluck-removing stations and with the frame of the splitting saw. on the slaughter line prior to the final inspection station. None of these pieces of equipment was sanitized between carcasses. This deficiency had been identified during a previous FSIS audit. Establishment officials agreed to re-configure the slaughter line to avoid common contact.

29 An operator at the quartering station was observed to drop a carcass hook on the floor, pick it up, and use it for the next carcass being quartered.

41 The post-mortem inspector failed to observe the cut surfaces of several of the incised head lymph nodes.

51 Numerous instances of inadequate pre-boning trim (specks of rail dust and grease) were found by the provincial veterinarian who was leading the audit. He ordered the day's production to be reinspected.

82(A) A formal HACCP system had not been developed in this establishment. (B) The only "critical control point" that had been identified for the slaughter process was the application of the plastic bag around the bung by the first skinning operator; no frequency of monitoring was specified, and the only person designated to monitor the critical limit (zero-tolerance for fecal contamination--see item 26-27, above) was the next operator, who was physically unable to see the critical area. Consequently, no documentation of the monitoring of the critical limit was attempted, or even possible, by the second operator. (C) The only establishment official who had had any "formal" HACCP training was the establishment manager, who had attended a two-day course some six years previously, and he had not developed a program to meet the HACCP requirements. There was no documentation that the "own-check" plan had been validated using multiple monitoring results, and no written procedures to verify that the plan was being effectively implemented and functioning as intended. (D) Neither the Veterinarian-In-Charge nor the Provincial Veterinarian who performed the supervisory reviews of the establishment and the in-plant inspection team had had any formal training in the principles of HACCP. NOTE: There was a great deal of misunderstanding by both NFA and establishment officials regarding the requirements for a compliant HACCP program, due, in part, to misunderstandings between these officials and the previous FSIS auditor.

83 The only documentation of operational sanitation activities was the monitoring of sterilizer temperatures and a recently (within the previous several weeks) developed program for controlling condensation. There was inadequate documentation of corrective actions and preventive measures taken in response to operational sanitation problems. This deficiency had been identified during a previous FSIS audit.

80 See above. After consultation with the Director of the FSIS Internal Audit Staff, the establishment was judged to fail to meet the basic FSIS requirements for equivalence and the Finnish NFA officials agreed to voluntarily remove this establishment from the list of establishments certified as eligible to export to the United States. NOTE: This establishment had never exported any product to the U.S., nor had the management any intention of doing so in the foreseeable future.

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U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE INTERNATIONAL PROGRAMS **FOREIGN PLANT REVIEW FORM**	REVIEW DATE 8/28/2001	ESTABLISHMENT NO. AND NAME 78 - Atria Oyj	CITY Kauhajoki COUNTRY Finland
NAME OF REVIEWER Dr. Gary D. Bolstad	NAME OF FOREIGN OFFICIAL Drs.AM Grönlund,Eeva Japisson,Raija Sinkkonen	EVALUATION ☐ Acceptable ☐ Acceptable/ Re-review ☒ Unacceptable	

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Hand washing facilities	04 U	**(d) ESTABLISHMENT SANITATION PROGRAM**		Inspector monitoring	60 A
Sanitizers	05 A	Effective maintenance program	33 U	Processing schedules	61 O
Establishments separation	06 A	Preoperational sanitation	34 A	Processing equipment	62 O
Pest --no evidence	07 M	Operational sanitation	35 A	Processing records	63 O
Pest control program	08 M	Waste disposal	36 A	Empty can inspection	64 O
Pest control monitoring	09 A	**2. DISEASE CONTROL**		Filling procedures	65 O
Temperature control	10 A	Animal identification	37 A	Container closure exam	66 O
Lighting	11 A	Antemortem inspec. procedures	38 A	Interim container handling	67 O
Operations work space	12 A	Antemortem dispositions	39 N	Post-processing handling	68 O
Inspector work space	13 A	Humane Slaughter	40 A	Incubation procedures	69 O
Ventilation	14 A	Postmortem inspec. procedures	41 A	Process. defect actions -- plant	70 O
Facilities approval	15 A	Postmortem dispositions	42 A	Processing control -- inspection	71 O
Equipment approval	16 A	Condemned product control	43 A	**5. COMPLIANCE/ECON. FRAUD CONTROL**	
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control	44 A	Export product identification	72 A
Over-product ceilings	17 U	Returned and rework product	45 A	Inspector verification	73 A
Over-product equipment	18 M	**3. RESIDUE CONTROL**		Export certificates	74 A
Product contact equipment	19 U	Residue program compliance	46 A	Single standard	75 A
Other product areas *(inside)*	20 A	Sampling procedures	47 A	Inspection supervision	76 A
Dry storage areas	21 M	Residue reporting procedures	48 A	Control of security items	77 A
Antemortem facilities	22 A	Approval of chemicals, etc.	49 A	Shipment security	78 A
Welfare facilities	23 A	Storage and use of chemicals	50 A	Species verification	79 O
Outside premises	24 A	**4. PROCESSED PRODUCT CONTROL**		"Equal to" status	80 U
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim	51 A	Imports	81 O
Personal dress and habits	25 M	Boneless meat reinspection	52 A	HACCP	82 A
Personal hygiene practices	26 U	Ingredients identification	53 O	SSOPs	83 M
Sanitary dressing procedures	27 U	Control of restricted ingredients	54 O		

FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE	ESTABLISHMENT NO. AND NAME	CITY
	8/28/2001	78 - Atria Oyj	Kauhajoki
			COUNTRY Finland

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL	EVALUATION
Dr. Gary D. Bolstad	Drs.AM Grönlund,Eeva Japisson,Raija Sinkkonen	☐ Acceptable ☐ Acceptable/ Re-review ☒ Unacceptable

COMMENTS:

04 There were no facilities for hand washing at the pre-boning trim station, and the pre-boning trimmer was not washing his hands at any other hand-washing facility. The pre-boning trimmer was using latex gloves for his trimming activities and changing them occasionally without any attempt to clean his hands after removing the soiled gloves and handling new ones to put them on.

07, 08 Dozens of flies were observed in the storage area for packaging materials. There were no insect-control measures. No attempt was made to close the large outside door to this area after it was opened for the audit, until the Auditor pointed out the need.

17, 18, 30 Condensation on ceilings and over-product equipment, as well as fluid leaking from ceilings, was found in many areas of the establishment. Both exposed and packaged product as well as containers ready for use were found under the problem areas.

17, 18, 33 Maintenance of over-product equipment and ceilings had been seriously neglected. In many exposed-product areas, ceilings, electrical fixtures and wiring, and support structures had obvious buildups of dust and stains. Other overhead structures were seen with buildups of apparent meat scraps that had been splashed onto them and dried, following the use of high-pressure water hoses during cleanup operations.

19 Straps on mesh aprons were found to have thick buildups of old product residues caked onto the fabric.

21 The entire ceiling in the carton storage area consisted of un-clad, fibrous insulation material.

25 Lockers were observed in both male and female welfare areas into which workers had placed work clothes, rather than into the laundry for cleaning. Also, lockers were observed with neglected cleaning of their upper surfaces, and workers had stored locker keys and a white plastic working belt on these very dusty upper surfaces.

26 Maintenance personnel were observed to fail to observe elementary principles of basic hygiene during their attempts to deal with structural and maintenence deficiencies identified during the audit. They were observed to handle product-contact equipment that was in place and ready for use to receive exposed product and to work with their tools on structures directly above exposed-product contact surfaces.

27a The first skinner was observed to make multiple opening cuts through the heavily soiled hide of the hind legs without sterilizing his knife before continuing. Obvious fecal contamination of the skinned areas were observed, even after he had been instructed to improve his operational sanitation.

27b The bung-bagging and -dropping procedure was insanitary. The operator routinely contaminated the "clean" side of the bung bag through contact with the soiled perianal skin. This specific problem had been identified during a previous FSIS sudit

28a Several areas of obvious and repeated common contact were observed on the slaughter line prior to the inspection stations. Consecutive arcasses were routinely contacting the hide-removing operator's platform, the eviscerator's platform, and the platform at the beginning of the inspection station, before the final inspection was even begun. This specific problem had been identified during at least two previous FSIS sudits of this establishment, and no corrective actions had been taken in spite of assurances that they would be.

28b A boning room worker allowed a portion of the meat he was trimming to contact the platform on which he wss standing. When an NFA official brought this to his attention, he activated the conveyor that moved it onto the product-contact belt. The NFA official again spoke to him, and he cut off and discarded the piece that had contacted the platform, but did not wash his hands until specifically told to do so. No corrective action was taken regarding the contaminated edible-product conveyor belt.

28c The eviscerator was observed to stand with the toes of his boots over the platform, so that they contacted the skinned carcasses.

82 Neither the inspection personnel assigned to the establishment for the supervising internal auditor had had a formal course in the principles and practice of the detailed requirements of a compliant HACCP program. Documentation of preventive measures taken when critical limits were exceeded was inadequate.

83 The documentation of operational sanitation activites, findings, corrective actions, and preventive meassures was inadequate. There was no documentation of condensation control (see items 17, 18, 30 above). Inadequate documentation of operational sanitation had been identified during a previous FSIS sudit of this establishment

80 See above. The NFA officials agreed that the establishment failed to meet the basic FSIS requirements and voluntarily removed it from the list of establishments certified as eligible to export to the United States. Note: this establishment had never exported any product to the United States, nor had the management any intention of doing so in the foreseeable future.

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U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE INTERNATIONAL PROGRAMS **FOREIGN PLANT REVIEW FORM**	REVIEW DATE 8/17/01	ESTABLISHMENT NO. AND NAME 6472 - Pakastamo Oy	CITY Vantaa (Helsinki) COUNTRY Finland
NAME OF REVIEWER Dr. Gary D. Bolstad	NAME OF FOREIGN OFFICIAL Dr. Eeva-Riitta Wirta, Dr. Irma Etelaemaeki	EVALUATION [X] Acceptable [ ] Acceptable/ Re-review [ ] Unacceptable	

CODES (Give an appropriate code for each review item listed below)
A = Acceptable M = Marginally Acceptable U = Unacceptable N = Not Reviewed O = Does not apply

1. CONTAMINATION CONTROL		Cross contamination prevention	28 A	Formulations	55 O
(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing	29 O	Packaging materials	56 O
Water potability records	01 A	Product handling and storage	30 A	Laboratory confirmation	57 O
Chlorination procedures	02 O	Product reconditioning	31 O	Label approvals	58 O
Back siphonage prevention	03 O	Product transportation	32 N	Special label claims	59 O
Hand washing facilities	04 A	**(d) ESTABLISHMENT SANITATION PROGRAM**		Inspector monitoring	60 A
Sanitizers	05 O	Effective maintenance program	33 A	Processing schedules	61 O
Establishments separation	06 O	Preoperational sanitation	34 A	Processing equipment	62 O
Pest --no evidence	07 A	Operational sanitation	35 A	Processing records	63 O
Pest control program	08 A	Waste disposal	36 A	Empty can inspection	64 O
Pest control monitoring	09 A	**2. DISEASE CONTROL**		Filling procedures	65 O
Temperature control	10 A	Animal identification	37 O	Container closure exam	66 O
Lighting	11 A	Antemortem inspec. procedures	38 O	Interim container handling	67 O
Operations work space	12 A	Antemortem dispositions	39 O	Post-processing handling	68 O
Inspector work space	13 O	Humane Slaughter	40 O	Incubation procedures	69 O
Ventilation	14 A	Postmortem inspec. procedures	41 O	Process. defect actions -- plant	70 O
Facilities approval	15 A	Postmortem dispositions	42 O	Processing control -- inspection	71 O
Equipment approval	16 O	Condemned product control	43 O	**5. COMPLIANCE/ECON. FRAUD CONTROL**	
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control	44 O	Export product identification	72 A
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Dry storage areas	21 A	Residue reporting procedures	48 O	Control of security items	77 A
Antemortem facilities	22 O	Approval of chemicals, etc.	49 A	Shipment security	78 A
Welfare facilities	23 A	Storage and use of chemicals	50 A	Species verification	79 C
Outside premises	24 A	**4. PROCESSED PRODUCT CONTROL**		"Equal to" status	80 A
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim	51 O	Imports	81 A
Personal dress and habits	25 A	Boneless meat reinspection	52 O	HACCP	82 O
Personal hygiene practices	26 A	Ingredients identification	53 O	SSOPs	83 A
Sanitary dressing procedures	27 O	Control of restricted ingredients	54 O		u

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FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE	ESTABLISHMENT NO. AND NAME	CITY / COUNTRY
	8/17/01	6472 - Pakastamo Oy	Vantaa (Helsinki) / Finland

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL	EVALUATION
Dr. Gary D. Bolstad	Dr. Eeva-Riitta Wirta, Dr. Irma Etelaemaeki	[X] Acceptable [ ] Acceptable/ Re-review [ ] Unacceptable

COMMENTS:

76 The last U.S. audit of Finland was in September-October 2000. Since that time, the supervising veterinarian visited this establishment only in December, February, and August. The requirement for monthly visits to cold stores handling U.S.-eligible product had not been understood. The Auditor explained the requirement in detail. The NFA officials gave assurances the visits would be made monthly. Also, the documentation of the Veterinarian-In-Charge of her monitoring activities of the establishment's sanitation activities was minimal. The auditor discussed this with her and the other NFA officials, and they gave assurances that more detailed documentation would be routinely performed.

79 No species verification sampling was being performed in Finland at the time of this audit.