



United States
Department of
Agriculture

Food Safety
and Inspection
Service

Washington, D.C.
20250

Dr. Klaus Lorenz, Head
Unit 106, Food of Animal Origin and Food Hygiene
Federal Office of Consumer Protection and Food Safety
Mauerstr. 39 – 42
PO Box 100214
D-10562 Berlin
GERMANY

APR 06 2010

Dear Dr. Lorenz:

The Food Safety and Inspection Service (FSIS) conducted an on-site audit of Germany's meat inspection system October 28 to November 18, 2009. You were invited to provide comments regarding the information in the draft final audit report. No comments were received from the government of Germany within 60 days. Enclosed is a copy of the final audit report.

If you have any questions regarding the FSIS audit or need additional information, please contact me at telephone number (202) 205-3969, by facsimile at (202) 720-0676, or electronic mail at james.adams5@fsis.usda.gov.

Sincerely,

James Adams, DVM
Director
International Audit Staff
Office of International Affairs

Enclosure

cc:

Bobby Richey, Minister Counselor, US Embassy, Berlin

Ann Ryan, State Department

Joachim Schaefer, Agricultural Counselor, Embassy of Germany

Debra Henke, Minister Counselor, US Mission to the EU, Brussels

Ghislain Marechal, EC, DG SANCO - Directorate General for Health and Consumers

Wolf Maier, Counselor, Food Safety and Consumer Affairs, EC

Bernard Van Goethem, Director, Directorate E

Alfred Almanza, Administrator, FSIS

David Young, FAS Area Director

OSTA/FAS

Ronald Jones, Assistant Administrator, OIA

James Adams, Director, IAS, OIA

Daniel Engeljohn, DAA, OPPD

Mary Stanley, Director, IPD, OPPD

Philip Derfler, AA, OPPD

Andreas Keller, Director, IES, OIA

Jerry Elliott, Director, IID, OIA

Rick Harries, Director, EPS

Harry Walker, IES, OIA

Country File

APR 06 2010

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

OCTOBER 28 THROUGH NOVEMBER 18, 2009

Food Safety and Inspection Service
United States Department of Agriculture

TABLE OF CONTENTS

1. SUMMARY
 - 1.1 Description/Eligibility
 - 1.2 Comparison of the Current Audit and the Previous Audit
 - 1.3 Summary Comments for the Current Audit
2. INTRODUCTION
3. OBJECTIVE OF THE AUDIT
4. PROTOCOL
5. LEGAL BASIS FOR THE AUDIT
6. SUMMARY OF PREVIOUS AUDITS
 - 6.1 April 2007 Audit
 - 6.2 June 2008 Audit
7. MAIN FINDINGS
 - 7.1 Legislation
 - 7.2 Government Oversight
 - 7.3 Headquarters Audit
8. ESTABLISHMENT AUDITS
9. LABORATORY AUDITS
10. SANITATION CONTROLS
 - 10.1 Sanitation Standard Operating Procedures
 - 10.2 Sanitation Performance Standards
 - 10.3 EC Directive 64/433
11. ANIMAL DISEASE CONTROLS
12. SLAUGHTER/PROCESSING CONTROLS
 - 12.1 Humane Handling and Slaughter
 - 12.2 HACCP Implementation
 - 12.3 Testing for Generic *Escherichia coli*
 - 12.4 Testing of Ready-to-Eat (RTE) Products
 - 12.5 EC Directive 64/433
13. RESIDUE CONTROLS
 - 13.1 FSIS Requirements
 - 13.2 EC Directive 96/22
 - 13.3 EC Directive 96/23

14. ENFORCEMENT CONTROLS

14.1 Daily Inspection

14.2 Testing for *Salmonella* in Raw Product

14.3 Species Verification

14.4 Periodic Reviews

14.5 Inspection System Controls

15. CLOSING MEETING

16. ATTACHMENTS TO THE AUDIT REPORT

ABBREVIATIONS AND SPECIAL TERMS USED IN THE REPORT

CCA	Central Competent Authority (Bundesamt fuer Verbraucherschutz und Lebensmittelsicherheit, BVL-Federal Office of Consumer Protection and Food Safety)
<i>E. coli</i>	<i>Escherichia coli</i>
FSIS	Food Safety and Inspection Service
LAVES	Exporting Establishment Certifying Authority in the Federal State of Lower Saxony (Landesamt fuer Verbraucherschutz und Lebensmittelsicherheit, Lower Saxony State Office of Consumer Protection and Food Safety)
<i>Lm</i>	<i>Listeria monocytogenes</i>
NOID	Notice of Intent to Delist
PR/HACCP	Pathogen Reduction/Hazard Analysis and Critical Control Point Systems
RTE	Ready-to-Eat
<i>Salmonella</i>	<i>Salmonella</i> Species
SPS	Sanitation Performance Standards
SSOP	Sanitation Standard Operating Procedures
VEA	European Community/United States Veterinary Equivalence Agreement

1. SUMMARY

1.1 Description/Eligibility

This report summarizes the outcome of the audit conducted in Germany from October 28 through November 18, 2009. This was a routine audit. Germany is eligible to export raw and processed pork products to the United States (U.S.). At the time of the audit, six establishments were eligible to export to the U.S. Between January 1 and November 1, 2009, Germany exported 643,210 pounds of raw and processed pork products to the U.S.; there were no rejections for U.S. import-related and/or food safety concerns. Activities of the current audit appear in the table below.

The findings of the previous audit during June 4 through June 25, 2008, resulted in no restrictions of any Germany establishment ability to export raw and processed pork products to the United States.

1.2 Comparison of the Current Audit and the Previous Audit

		CURRENT AUDIT DATES: October 28 through November 18, 2009	PREVIOUS AUDIT DATES: June 4 through June 25, 2008
Levels of Government Oversight Audited			
	Central	1	1
	State	1	1
	Region	1	0
	District	0	2
Laboratories Audited			
	Microbiology	1	1
	Residue	0	0
Establishments Audited			
	Slaughter/processing	0	0
	Processing	6	5
Enforcement Actions Initiated			
	NOID	0	0
	Delistment	0	0
Risk Area Findings			
	Sanitation Controls (SSOP, SPS)	5	10
	Animal Disease Controls	0	0
	Slaughter/Processing (PR/HACCP)	2	5
	Residue Controls	N/A	N/A
	Microbiology Controls	0	1
	Inspection/Enforcement Controls	4	4
	Special Emphasis (HH, O157:H7)	N/A	N/A

1.3 Summary Comments for the Current Audit

The results of this audit reflected risk area findings in sanitation controls, slaughter processing controls, and enforcement controls.

2. INTRODUCTION

An opening meeting was held on October 28 in Berlin with the Central Competent Authority (CCA). At this meeting, the auditor confirmed the objective and scope of the audit and discussed the auditor's itinerary.

The auditor was accompanied during the entire audit by representatives from the CCA, the Federal Office of Consumer Protection and Food Safety and/or representatives from the state, region, district, and local inspection offices.

3. OBJECTIVE OF THE AUDIT

The objective of the audit was to evaluate the performance of the CCA with respect to controls over the processing establishments certified by the CCA as eligible to export meat products to the U.S.

In pursuit of the objective, the following sites were visited: the headquarters of the CCA in Berlin, one Federal State inspection office in the State of Lower Saxony in Hannover, one Regional inspection office in the State of Bavaria in Ansbach, one government laboratory performing *Listeria monocytogenes* (*Lm*) and *Salmonella* species (*Salmonella*) analyses on U.S.-destined product in Oldenburg, and six meat processing establishments.

4. PROTOCOL

This 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 audits of selected state, regional, and local inspection offices responsible for oversight of establishments certified for export to the U.S. The third part involved on-site visits to six processing establishments. The fourth part involved a visit to one government laboratory. The Landesamt fuer Verbraucherschutz und Lebensmittelsicherheit, Lower Saxony State Office of Consumer Protection and Food Safety (LAVES) Veterinarinstitut in Oldenburg, was conducting analyses for the presence of *Lm* and *Salmonella* in product destined for the U.S.

Program effectiveness determinations of Germany's inspection system focused on five areas of risk: (1) sanitation controls, including the implementation and operation of Sanitation Standard Operating Procedures (SSOP) and Sanitation Performance Standards (SPS); (2) animal disease controls; (3) processing controls, including the implementation and operation of Hazard Analysis Critical Control Point (HACCP) programs; (4) residue controls; and (5) enforcement controls. Germany's inspection system was assessed by evaluating these five risk areas.

During all on-site establishment visits, the auditor evaluated the nature, extent, and degree to which findings impacted on food safety and public health. The auditor also assessed how inspection services are carried out by Germany 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 auditor explained to the CCA that their inspection system would be audited in accordance with three areas of focus. First, under provisions of the European Community/United States Veterinary Equivalence Agreement (VEA), the Food Safety and Inspection Service (FSIS) auditor would audit the meat inspection system against European Commission (EC) Directive 64/433/EEC of June 1964; EC Directive 96/22/EC of April 1996; and EC Directive 96/23/EC of April 1996. These directives have been declared equivalent under the VEA.

Second, in areas not covered by these directives, the auditor would audit against FSIS requirements. These include: daily inspection in all certified establishments during the production of products eligible for export to the U.S.; the handling and disposal of inedible and condemned materials; and FSIS requirements for HACCP, SSOP, and SPS.

Third, the auditor would audit against any equivalence determinations that have been made by FSIS for Germany under provisions of the Sanitary/Phytosanitary Agreement. There are no equivalence determinations pertaining to Germany at this time.

5. LEGAL BASIS FOR THE AUDIT

The audit was undertaken under the specific provisions of U.S. laws and regulations, in particular:

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

In addition, compliance with the following European Community Directives was also assessed:

- Council Directive 64/433/EEC, of June 1964, entitled "Health Problems Affecting Intra-Community Trade in Fresh Meat";
- Council Directive 96/23/EC, of 29 April 1996, entitled "Measures to Monitor Certain Substances and Residues Thereof in Live Animals and Animal Products"; and
- Council Directive 96/22/EC, of 29 April 1996, entitled "Prohibition on the Use in Stockfarming of Certain Substances Having a Hormonal or Thyrostatic Action and of Beta-agonists".

6. SUMMARY OF PREVIOUS AUDITS

Final audit reports are available on the FSIS website at the following address:

6.1 April 2007 Audit

During the April 2007 FSIS audit of Germany's meat inspection system, the following non-compliances were found:

- The CCA, after review and evaluation by the District Office, and the concurrence of the Federal State Ministry, allowed the certification of a new U.S. export establishment that subsequently received a Notice of Intent to Delist (NOID). This certification was permitted for an establishment found to have serious deficiencies in the implementation of HACCP requirements and in the implementation of testing for *Lm* in the ready-to-eat (RTE) product processing environment. In addition, the CCA failed to provide competent, qualified inspectors in this establishment. In the Federal State Ministry and the related District Office, the inspection personnel appeared to lack awareness of many of the U.S. HACCP requirements and the requirements for establishment testing of RTE product contact surfaces for *Lm*;
- In all three establishments audited, the government inspectors were not enforcing some of the U.S. requirements;
- In two of the three establishments audited, the government inspectors were not enforcing some of the EC requirements;
- The Guidance Document supplied by the CCA to inspection personnel did not contain some recent changes in the U.S. requirements, e.g., requirements of the *Listeria* Rule (9 CFR 430);
- In all three establishments, some of the SSOP implementation requirements or records requirements were not met;
- In two of the three establishments audited, the provisions of EC Directive 64/433 were not effectively implemented;
- Two of the three establishments audited did not meet some of the HACCP implementation requirements; and
- One establishment had not evaluated the processing environment regarding post-lethality exposure of meat products to *Lm* and had not developed a plan for testing required by the *Listeria* Rule.

6.2 June 2008 audit

During the June 2008 FSIS audit of Germany's meat inspection system, the following deficiencies were found:

- In one establishment, direct contact was observed between an employee's boots and the sausages on a rack as he was hanging them after the stuffing machine and prior to the smokehouse.
- In one establishment, SSOP written program did not have clearly defined frequencies for activities included in operational sanitation.
- In one establishment, SSOP monitoring records did not include possible involvement and disposition of product in corrective actions for deficiencies recorded. Because of

the nature of this operation, product is present in many areas during even pre-operational monitoring.

- In one establishment, one of the plastic-link conveyor belts on a dicing machine had a number of breaks all at the same location on the belt.
- In one establishment, the SSOP plan did not differentiate between activities that were pre-operational and those that were operational. The frequencies for the above activities and for monitoring were not clear.
- In one establishment, pre-operational sanitation monitoring records did not have sufficient detail in the description of the deficiencies or in the corrective actions to allow for verification of these. These same records did not contain preventive measures for deficiencies of product-contact surfaces.
- In one establishment, several pipes, both in the peeling room and the brine filler area, had leaking connections.
- In one establishment, many of the large containers used to transport fresh meat to the cutting machines had unsmooth welds which could allow for the formation of biofilms. Many equipment seals throughout the establishment were broken and deteriorating.
- In one establishment, the establishment was not following their own water sampling program and was missing the paperwork from some yearly physical/chemical analysis. Also, the establishment had not done some of the monthly sampling the program requires.
- In one establishment, some of the large metal containers used to transport finished hams to the slicing operation had unsmooth welds which could allow for the formation of biofilms. Tape had been used for repairs on a number of locations on the slicing/packaging machines. This shredded and uncleanable surface caused insanitary conditions to exist.
- In one establishment, one slicing/packaging machine had a hose attached to it that was allowed to lie on the floor. This hose is used for clean-up during breaks in operations and the surface touching the floor could come into contact with food-contact surfaces during clean-up. The veterinary service has previously discussed this problem, but action has not been taken by the establishment to address the deficiency.
- In one establishment, several locations in the establishment did not have a good seal to make structures impervious to water and easily cleanable. These included walls to curbs, curbs to floors, and around the attachment of bumpers to walls.
- In one establishment, some of the red cutting boards in the boning room were deeply scored thereby not allowing for adequate cleaning
- In one establishment, in several areas of the pizza production line including dough production, electrical lines were not secured in a manner that did not allow potential contact between the line and the product. There was also potential cross-contamination between pizza crusts and a roller bar following the oven and leading to the cooling racks.
- In one establishment, the flow diagram and the hazard analysis for the production of pizza did not contain the receipt or storage of meat ingredients, other than meat ingredients, or of packaging materials. The flow diagram included a step for rework, but that step was not addressed in the hazard analysis.

- In one establishment, the flow diagram did not include the receipt or storage of non-meat ingredients or of packaging materials. The hazard analysis also did not include and consider those steps.
- In one establishment, the flow diagram was extremely difficult to follow and included many items not in the direct production steps of the product. This led to confusion in the designation of the CCPs and the resulting HACCP plan.
- In one establishment, the HACCP monitoring records did not contain the initials of the monitor at the actual time of the event.
- In one establishment, the monitoring records for CCP 3, a metal detector, did not contain a result.
- In one establishment they use Alternative 3, sanitation only, for the *Listeria monocytogenes* program for post-lethality exposed RTE product. There was no identification of the conditions for the implementation of a test and hold program following a positive food-contact surface result.
- In the government microbiology laboratory, the calibration for the balance primarily used to weigh samples was being done at 100 grams and 500 grams, but many of the sample weights are 10 and 25 grams.
- In the government microbiology laboratory, when analyzing the pizza samples, the analysis was done on all of the ingredients, not just the meat part of the pizza.

These specific non-compliances were verified as having been corrected during the October/November 2009 FSIS audit.

7. MAIN FINDINGS

7.1 Legislation

The auditor was informed that the relevant EC Directives, determined equivalent under the VEA, had been transposed into Germany's legislation.

7.2 Government Oversight

The CCA for Germany is the Federal Office of Consumer Protection and Food Safety (BVL). This office is the contact point for inspections and is responsible for all activities related to the export of meat products to other countries, including the certification and de-certification of establishments for export activities. This office is also responsible for verifying that appropriate corrective actions are taken and communicating that information to third parties when deficiencies are noted during audits.

7.2.1 CCA Control Systems

- Although the CCA has the authority to certify and de-certify establishments with cooperation from competent authority on the Lander level, the 16 Federal States (Lander) are responsible for the administration, coordination, and supervision of inspection activities in their respective State. Each of the 16 Federal States is divided into Districts. The District Office controls, implements, and enforces Federal meat inspection regulations through the individual local offices. The Federal States

communicate with the German Federal Government and other Federal States on matters of food and feed laws through working groups or committees. Unit 103 in department 1 of the BVL (CCA) is responsible for organizing or coordinating these working groups or committees.

7.2.2 Ultimate Control and Supervision

- The Federal Office of Consumer Protection and Food Safety is the responsible authority for matters concerning exports, including the authority to certify and de-certify establishments for such export, and communication with entities outside Germany. Control and supervision over official inspection activities for all establishments that export meat products rests with the Federal State Ministry in the respective Federal State. Federal law in Germany does not currently allow the Federal Office to audit functions of the Federal State Ministry.

7.2.3 Assignment of Competent, Qualified Inspectors

- Responsibility for the assignment of competent, qualified inspectors lies with the District Veterinary Office where the establishment is located. Training is provided in accordance with EC Directives, Federal State laws, and the requirements of the inspectors' assignments.

7.2.4 Authority and Responsibility to Enforce the Laws

- The CCA has the authority and responsibility for legislation, coordination and supervision. This is evidenced by the action the Federal Office of Consumer Protection and Food Safety have taken to develop and issue inspection guidelines which contain FSIS requirements. These guidelines have been implemented by all States that have certified establishments within their boundaries.

7.2.5 Adequate Administrative and Technical Support

- The CCA has adequate administrative and technical support to operate its inspection system.

7.3 Headquarters Audit

The auditor conducted a review of inspection-related documents at the Federal Office of Consumer Protection and Food Safety headquarters. These documents included: the organizational structure of the Federal Office of Consumer Protection and Food Safety; communications and translations of correspondences from FSIS; reports of investigations into violations of food safety regulations; and information of laboratories providing testing for certified establishments.

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

7.3.1 Audit of State, Regional and Local Inspection Offices

- The auditor interviewed inspection officials at several levels of the inspection program. Inspection officials were interviewed at one Federal State inspection office in the State of Lower Saxony in Hannover, and regional inspection office in the state of Bavaria in Ansbach. The interviews focused on the communications between the BVL and the local authorities regarding: U.S. export requirements; periodic reviews in the certified establishments; procedures and documentation for daily inspection in U.S. export establishments; the training of inspection personnel regarding U.S. requirements; and the procedures for distribution and assessment of laboratory reports. Documents reviewed included: copies of the Guidance Document for U.S. export establishments distributed by the BVL; daily inspection and periodic review documents from the establishments exporting to the U.S.; e-mail files of communications concerning U.S. requirements; and laboratory analysis reports.

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

8. ESTABLISHMENT AUDITS

The FSIS auditor visited all six processing establishments eligible to export to the U.S. None of these establishments were delisted by Germany. None of these establishments received a NOID.

Specific non-compliances are noted on the attached individual establishment reports.

9. RESIDUE AND MICROBIOLOGY LABORATORY AUDITS

During laboratory audits, emphasis is placed on the application of procedures and standards that are equivalent to U.S. requirements.

Residue and microbiology laboratory audits focus on: analyst qualifications; sample receipt; timely analysis; analytical methodologies; analytical controls; recording and reporting of results; and check samples.

No residue laboratory was reviewed during this audit.

The following microbiology laboratory was reviewed:

The LAVES Veterinarinstitut, a government laboratory, in Oldenburg, Lower Saxony.

This laboratory was performing analyses of RTE products for both *Lm* and *Salmonella* as required.

No non-compliances were observed during this audit.

10. SANITATION CONTROLS

As stated earlier, the FSIS auditor focuses on five areas of risk to assess an exporting country'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, Germany'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, Germany's inspection system had controls in place for: water potability records; chlorination procedures; back-siphonage prevention; separation of operations; temperature control; work space; ventilation; welfare facilities; and outside premises.

10.1 Sanitation Standard Operating Procedures

Each establishment was evaluated to determine if the FSIS regulatory requirements for SSOP were met according to the criteria employed in the U.S. domestic inspection program.

In one of the six establishments audited, some of the Basic SSOP requirements were not met.

In all six establishments audited, the SSOP ongoing requirements were met.

Specific non-compliances are noted in the attached individual establishment reports.

10.2 Sanitation Performance Standards

Three of the six establishments audited had non-compliances in SPS requirements.

Specific non-compliances are noted in the attached individual establishment reports.

10.3 EC Directive 64/433

In two of the six establishments audited, some of the EC Directive 64/433 requirements were not met.

Specific non-compliances are noted in the attached individual establishment reports.

11. 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 Germany's inspection system had adequate controls in place.

No non-compliances were reported during this audit.

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

12. 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.

12.1 Humane Handling and Humane Slaughter

No slaughter facilities are currently certified in Germany.

12.2 HACCP Implementation

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

The HACCP programs were reviewed during the on-site audits of all six certified processing establishments.

In two of the six establishments audited, basic HACCP non-compliances were reported.

In all six establishments audited, ongoing HACCP requirements were met.

The specific non-compliances are noted in the attached individual establishment reports.

12.3 Testing for Generic *Escherichia coli*

No slaughter facilities are currently certified in Germany.

12.4 Testing of Ready-to-Eat (RTE) Products

Four of the six establishments audited were producing RTE products for export to the U.S. In accordance with FSIS requirements, these establishments are required to meet the testing requirements for RTE products.

In all four of these establishments, the government was testing RTE products for both *Lm* and *Salmonella* as required.

12.5 EC Directive 64/433

In two of the six establishments audited, some of the EC Directive 64/433 requirements were not met.

Specific non-compliances are noted in the attached individual establishment reports.

13. 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.

No residue laboratory was reviewed during this audit.

13.1 FSIS Requirements

At the time of this audit, no German slaughter establishments were certified for U.S. export. All raw products are obtained from certified slaughter establishments in Denmark and The Netherlands. Therefore, residue controls are enforced at the Danish, Dutch and Spain slaughter establishments.

13.2 EC Directive 96/22

No residue laboratory was reviewed during this audit.

13.3 EC Directive 96/23

No residue laboratory was reviewed during this audit.

14. 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*.

In three of the six establishments audited, the inspection service was not enforcing some of the FSIS requirements.

The specific non-compliances are noted in the attached individual establishment reports.

Daily Inspection

Inspection was being conducted daily during all production eligible for export to the U.S. in all establishments audited.

14.2 Testing for *Salmonella* in Raw Product

No slaughter facilities are currently certified in Germany.

14.3 Species Verification

Species verification was being conducted in those establishments in which it was required.

14.4 Periodic Reviews

During this audit, it was found that in all establishments visited, periodic reviews were being performed and documented as required.

14.5 Inspection System Controls

The CCA had controls in place for prevention of commingling of product intended for export to the U.S. with product intended for the domestic market.

In addition, controls were in place for the importation of only eligible livestock from other countries, i.e., only from eligible third countries and certified establishments within those countries, and the importation of only eligible meat products from other countries for further processing.

Lastly, adequate controls were found to be in place for: security items; shipment security; and products entering the establishments from outside sources.

15. CLOSING MEETING

A closing meeting was held on November 18 in Berlin with the CCA. At this meeting, the preliminary audit findings were presented by the auditor.

The CCA understood and accepted the findings.

Dr. Farooq Ahmad
Senior Program Auditor

 Farooq Ahmad DM 4/5/2010

16. ATTACHMENTS TO THE AUDIT REPORT

Individual Foreign Establishment Audit Reports
Foreign Country Response to Draft Final Audit Report

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Meica Meat Packing Plant of Ammerland Postfach 1160 Edeweicht, Lower Saxony D-26188	2. AUDIT DATE 11/05/09	3. ESTABLISHMENT NO. A-IV-10	4. NAME OF COUNTRY Germany
	5. NAME OF AUDITOR(S) Farooq Ahmad, DVM		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	X
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	X
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	X	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	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	O	Part G - Other Regulatory Oversight Requirements	
28. Sample Collection/Analysis	O	56. European Community Directives	
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

Date: 11/05/2009 Est #: A-IV-10 (Meica Meat Packing Plant of Ammerland [P]) (Edewecht, Germany)

This establishment had written general food defense plan named "Crisis Management Program".

15/51. It was observed during the review of the HACCP plan for RTE sausages, dated May 12, 2009, that flow diagram did not include the storage of in-coming packaging material (cardboard boxes) and hazard analysis for this step. Government officials did not observe this non-compliance. Establishment and government officials assured to correct this non-compliance without further delay. (1) [Regulatory references: 9 CFR §417.2(a) and 417.8]

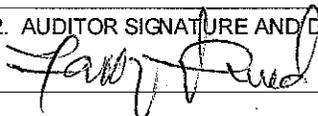
38/51 In the packaged product storage room, cobwebs, dead and live insects on the floor at the floor/wall curb were observed where U.S. product was stored and throughout in the storage room at the floor/wall curb and corners. The establishment's employee started cleaning immediately in the area where U.S. product was stored. The establishment's and government officials assured the entire room will be cleaned for this non-compliance. The inspection officials did not observe this non-compliance and it was not recorded in other sanitation (SPS) records. (1) [9 CFR §416.2]

41 In the sausage room, condensate was observed on the overhead pipes. The production was stopped immediately by the establishment's official and product was removed from the production line. The operation was resumed after the condensate was removed. (2) [9 CFR §416.2(d)]

61. NAME OF AUDITOR

Farooq Ahmad, DVM

62. AUDITOR SIGNATURE AND DATE

 DVM 4/5/10

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION H. Klumper GmbH & Company KG Ratsherr-Schlikker-Strasse 63 Schutterf, Lower Saxony D-48465	2. AUDIT DATE 11/04/2009	3. ESTABLISHMENT NO. A-EV-29	4. NAME OF COUNTRY Germany
5. NAME OF AUDITOR(S) Farooq Ahmad, DVM		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.		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	
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

Date: 11/04/2009 Est #: A-EV-29 (H. Kluemper GmbH & Company KG [P]) (Schuttorf, Germany)

This establishment had written general food defense plan named "Crisis Management of Different Types".

SSOP: Establishment's SSOP written plan and at least last three months of establishment's and government inspection records of SSOP which included pre-operational and operational sanitation were reviewed. It was observed after tour of the facility that SSOP records reflect the condition of the establishment. There were no significant SSOP findings to report after consideration of the nature, degree and extent of all observations.

HACCP: Establishment's HACCP plan for sliced and diced ham and at least last three months of HACCP records including government verification records were reviewed. During the tour of the facility it was observed that CCP for metal detector was being monitored as written in the HACCP plan for dicing ham.

Listeria monocytogenes: There was one product sample from sliced ham which was positive for *Listeria monocytogenes* on April 21, 2009. This sample was collected by government official and send to government microbiology laboratory in Oldenburg. This product (sliced ham) was not exported to U.S. due to positive test result for *Listeria monocytogenes*. The establishment had incorporated test and hold method of product into SSOP program. The establishment used alternative 3 for control of *Listeria monocytogenes*.

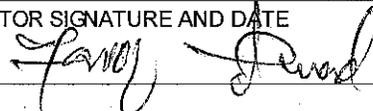
The following corrective actions were taken by the establishment after the positive test result of *Listeria monocytogenes*.

1. Intensive cleaning and sanitizing of the slicing area with special attention to line 2 (US-production).
2. Training of the cleaning staff (external) and the employees (internal).
3. Intensive training of the employees in the slicing area concerning the preventive actions to avoid L. m. contamination.

61. NAME OF AUDITOR

Farooq Ahmad, DVM

62. AUDITOR SIGNATURE AND DATE

 4/5/10

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Gebrueder Abraham GmbH & Company KG Osterschepser Str. 40 Edewecht, Lower Saxony 26188	2. AUDIT DATE 11/03/2009	3. ESTABLISHMENT NO. A-EV-35	4. NAME OF COUNTRY Germany
	5. NAME OF AUDITOR(S) Farooq Ahmad, DVM		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	X
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	X
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

Date: 11/03/2009 Est #: A-EV-35 (Gebrueder Abraham GmbH & Company KG [PJ]) (Edeweicht, Germany)

45 (a) In the deboning room, during the operation three metal tables used for ham processing were observed with welding which was not continued and had gaps, which could made it difficult to clean and allow for the formation of biofilms. The establishment's official assured these tables would be repaired in the same evening.

(b) In the ham dicing room, one metal meat hopper was observed with welding which was not continued and had gaps, which could made it difficult to clean and allow for the formation of biofilms. The establishment's official stopped the line and hopper was removed from this room. In the same room three metal ham tables were observed with unsmooth welding which could allow for the formation of biofilms. The establishment's official assured to repair these tables by end of the same week.

(2) [Regulatory references: 9 CFR §416.3(a) and EC Directive 64/433 CHAPTER 111, 3(c)]

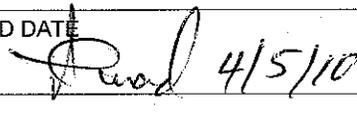
SSOP: Establishment's SSOP written plan and at least last three months of establishment's and government inspection records of SSOP which included pre-operational and operational sanitation were reviewed. It was observed after tour of the facility that SSOP records reflect the condition of the establishment. There were no significant SSOP findings to report after consideration of the nature, degree and extent of all observations.

HACCP: Establishment's HACCP plan for cured and smoked ham and at least last three months of HACCP records including government verification records were reviewed. During the tour of the facility it was observed that all the CCPs were being monitored as written in the HACCP plan.

61. NAME OF AUDITOR

Farooq Ahmad, DVM

62. AUDITOR SIGNATURE AND DATE

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Gebrueder Abraham Ham GmbH & Co KG Konigstrasse 3 Bassel/Harkebruegge, Lower Saxony 26676	2. AUDIT DATE 11/10/2009	3. ESTABLISHMENT NO. A-IV-191	4. NAME OF COUNTRY Germany
	5. NAME OF AUDITOR(S) Farooq Ahmad, DVM		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.		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	
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

Date: 11/10/2009 Est #: A-IV-191 (Gebrueder Abraham Ham GmbH & Co KG [P]) (Barssel/Harkebruegge,

This establishment had written general food defense plan named "Crisis Management".

SSOP: Establishment's SSOP written plan and at least last three months of establishment's and government inspection records of SSOP which included pre-operational and operational sanitation were reviewed. It was observed after tour of the facility that SSOP records reflect the condition of the establishment. There were no significant SSOP findings to report after consideration of the nature, degree and extent of all observations.

Pre-operational Sanitation inspection conducted by inspection official was observed at this facility. This task was completed by the inspection official according to FSIS regulations and guidelines.

61. NAME OF AUDITOR

Farooq Ahmad, DVM

62. AUDITOR SIGNATURE AND DATE

 Farooq Ahmad DVM 4/15/10

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION HoWe Wurstwaren KG Regenstrasse 1 DE - 90451 Nurnberg	2. AUDIT DATE 11/13/09	3. ESTABLISHMENT NO. EV-717	4. NAME OF COUNTRY Germany
	5. NAME OF AUDITOR(S) Farooq Ahmad, DVM		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	X	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	X
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	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	O	Part G - Other Regulatory Oversight Requirements	
28. Sample Collection/Analysis	O	56. European Community Directives	X
29. Records	O	57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions	O	59.	
31. Reassessment	O		
32. Written Assurance	O		

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Dr. Oetker Tiefkühlprodukte Sudring 1 Wittenburg, Mecklenburg-Western Pomerania 19243	2. AUDIT DATE 11/02/2009	3. ESTABLISHMENT NO. EV-830	4. NAME OF COUNTRY Germany
	5. NAME OF AUDITOR(S) Farooq Ahmad, DVM		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.	X	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	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	O	Part G - Other Regulatory Oversight Requirements	
28. Sample Collection/Analysis	O	56. European Community Directives	
29. Records	O	57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions	O	59.	
31. Reassessment	O		
32. Written Assurance	O		