USDA

United States Department of Agriculture

Food Safety and
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Mr. Robert Huey
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AUG 2 2 2016

Dear Mr. Huey,

The Food Safety and Inspection Service (FSIS) conducted an on-site audit of Northern Ireland's meat inspection system from April 13 through April 22, 2016. Enclosed is a copy of the final audit report. The comments received from the Government of Northern Ireland are included as an attachment to the report.

If you have any questions, please feel free to contact me directly.

Sincerely,

Jane H. Doherty
International Coordination Executive
Office of International Coordination

Enclosure

FINAL REPORT OF AN AUDIT CONDUCTED IN

NORTHERN IRELAND

April 13 to April 22, 2016

EVALUATING THE FOOD SAFETY SYSTEMS GOVERNING

MEAT PRODUCTS

EXPORTED TO THE UNITED STATES OF AMERICA

August 18, 2016
Food Safety and Inspection Service
United States Department of Agriculture

Executive Summary

This report describes the outcome of an on-site equivalence verification audit conducted by the Food Safety and Inspection Service (FSIS) from April 13 to April 22, 2016. The purpose of the audit was to determine whether Northern Ireland's food safety system governing meat products remains equivalent to that of the United States, with the ability to export products that are safe, wholesome, unadulterated, and accurately labeled and packaged. Northern Ireland currently exports the following categories of pork products: raw – intact; raw – not intact; products with secondary inhibitors – not shelf stable.

The audit focused on six system equivalence components: Government Oversight (Organization & Administration), Statutory Authority and Food Safety Regulations (Inspection System Operation and Product Standards), Sanitation, Hazard Analysis and Critical Control Points (HACCP) Systems, Government Chemical Residue Control Programs, and Government Microbiological Testing Programs.

The audit did not identify any systemic findings that represented an immediate threat to public health. The audit findings showed gaps in the documentation for follow-up verification activities for non-compliance with requirements outlined in 9 CFR 327.2, paragraphs (a)(2)(ii)(A) through (H), identified during periodic supervisory visits, that were corrected after the supervisory visit. FSIS also identified some operational (or procedural) weaknesses related to Sanitation and HACCP Systems.

An exit meeting was held on April 22, 2016, in Belfast, Northern Ireland with representatives from the Central Competent Authority (CCA), the Department of Agriculture and Rural Development (DARD). FSIS presented the preliminary audit findings. During the audit exit meeting, DARD representatives committed to begin to address the preliminary findings as presented. FSIS will evaluate for effectiveness any information provided by Northern Ireland.

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I. INTRODUCTION

The Food Safety and Inspection Service (FSIS) of the United States Department of Agriculture (USDA) conducted an on-site audit of Northern Ireland's food safety system from April 13 to April 22, 2016. The audit began with an entrance meeting held on April 13, in Belfast, Northern Ireland with the participation of the FSIS auditors and representatives from the Central Competent Authority (CCA), the Department of Agriculture and Rural Development (DARD). Representatives from the Food Safety Authority – Northern Ireland (FSA-NI) were also present at the entrance meeting.

II. AUDIT OBJECTIVE, SCOPE, AND METHODOLOGY

This was a routine ongoing equivalence verification audit. The audit's objective was to ensure Northern Ireland's food safety system governing meat products maintains equivalence to that of the United States, with the ability to export products which are safe, wholesome, unadulterated, and correctly labeled and packaged.

FSIS applied a risk-based procedure which included an analysis of the country's performance within six equivalence components, product types and volumes, frequency of prior audit-related site visits, point-of-entry (POE) testing results, and specific oversight activities and testing capabilities of government offices and laboratories. The review process included an analysis of data collected by FSIS over a three-year timeframe, in addition to information obtained directly from the CCA through a self-reporting process.

Representatives from the CCA and the local inspection offices accompanied the FSIS auditors throughout the entire audit. Determinations concerning program effectiveness focused on performance within the following six components upon which system equivalence is based: (1) Government Oversight (Organization and Administration), (2) Statutory Authority and Food Safety Regulations (Inspection System Operation and Product Standards), (3) Sanitation, (4) Hazard Analysis and Critical Control Points (HACCP) Systems, (5) Government Chemical Residues Testing Programs, and (6) Government Microbiological Testing Programs.

A review of administrative functions took place at CCA headquarters, a divisional (regional) office, and two local inspection offices. During the review, the FSIS auditors evaluated the implementation of management control systems in place, which ensure that the national system of inspection, verification, and enforcement is being implemented as intended.

FSIS audited the two establishments certified to export pork and pork products to the United States. During the establishment visits, particular attention was paid to the extent to which industry and government interact to control hazards and prevent non-compliances that threaten food safety. Emphasis was placed on the CCA's ability to provide oversight through supervisory reviews conducted in accordance with FSIS equivalency requirements for foreign inspection systems outlined in Title 9 of the United

States Code of Federal Regulations (9 CFR) § 327.2 (i.e., the FSIS regulations addressing equivalency determinations for foreign country inspection systems). Additionally, three laboratories were audited to verify their ability to provide adequate technical support to the inspection system.

Competent Authority Visits		#	Locations
Competent Authority	Central	2	▪ Department of Agriculture and Rural Development (DARD), Belfast ▪ Food Safety Authority – Northern Ireland (FSA-NI), Belfast
	Divisional Office	1	▪ Meat Inspection Branch South East, Newry
	Local	2	▪ Cookstown and Dungannon
Laboratories		3	▪ One private microbiology laboratory in Moy ▪ Two government laboratories (one residue, one microbiology) in Belfast
Establishments		2	▪ 1 porcine slaughter and processing establishment (Cookstown) ▪ 1 cold storage facility (Dungannon)

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

- The Federal Meat Inspection Act (21 United States Code [U.S.C.] 601, et seq.),
- The Humane Methods of Livestock Slaughter Act (7 U.S.C. 1901, et seq.), and
- The Food Safety and Inspection Service Regulations for Imported Meat (9 CFR Part 327).

In addition, the FSIS auditors verified that the system implemented and enforced United States equivalent European Commission (EC) regulations and directives:

- Regulations (EC) 852/2004; 853/2004; 854/2004; 882/2004; 2073/2005; 178/2002, and
- Directives 96/22/EC and 96/23/EC.

The audit standards applied during the review of Northern Ireland's inspection system for meat products included: (1) All applicable legislation originally determined by FSIS as equivalent as part of the initial review process, and (2) any subsequent equivalence determinations that have been made by FSIS under provisions of the Sanitary/Phytosanitary Agreement.

Currently, Northern Ireland has equivalence determinations in place for the following:

- Testing for *Enterobacteriaceae* and Aerobic Colony Count (ACC) in lieu of testing for generic *Escherichia coli* (as applicable to all European Union (EU) exporting countries).

III. BACKGROUND

Northern Ireland is eligible to export pork products to the United States within the following product categories: raw – intact; raw – not intact; products with secondary inhibitors – not shelf stable.

From October 1, 2012 to September 30, 2015, FSIS import inspectors performed 100% re-inspection for labeling and certification on 11,803,098 pounds of pork products exported by Northern Ireland to the United States. FSIS also performed re-inspection on 5,901,035 pounds at point-of entry (POE) for additional types of inspection (TOI), of which a total of 3,173 pounds were refused entry for issues not involving food safety concerns (e.g., label approval, container shipping damage).

The FSIS final audit reports for Northern Ireland's food safety system are available on FSIS' web site at:
http://www.fsis.usda.gov/wps/portal/fsis/topics/international-affairs/importing-products/eligible-countries-products-foreign-establishments/foreign-audit-reports

IV. COMPONENT ONE: GOVERNMENT OVERSIGHT (ORGANIZATION AND ADMINISTRATION)

The first of six equivalence components that the FSIS auditors reviewed was Government Oversight. FSIS import regulations require the foreign inspection system to be organized by the national government in such manner to provide ultimate control and supervision over all official inspection activities; ensure the uniform enforcement of requisite laws; provide sufficient administrative technical support; and assign competent qualified inspection personnel at establishments where products are prepared for export to the United States.

The food safety inspection system in Northern Ireland is based on collaboration between the Food Standards Agency (FSA) and the Department of Agriculture and Rural Development (DARD). The FSA is an independent government department responsible for food safety and hygiene across the United Kingdom (UK), which consists of Northern Ireland, England, Scotland, and Wales. "The Food Standards Act of 1999" established the FSA, which is the central competent authority for food safety in the United Kingdom. The devolved Department of Agriculture and Rural Development for Northern Ireland (DARD), Veterinary Service (VS), Veterinary Public Health Programme (VPHP) carries out the official controls (delivery functions) in approved slaughterhouses, cutting plants and game handling establishments on behalf of the FSA- Northern Ireland (FSA-NI) under the terms of a Service Level Agreement (SLA). The Department for Environment, Food and Rural Affairs (DEFRA) is the UK Central Competent Authority for animal health and welfare law in England and is responsible for policy and regulations on environmental, food and rural issues. Although DEFRA works directly in England, it collaborates with DARD and FSA, and generally leads for the UK on negotiations in the EU and internationally.

Effective May 8, 2016, DARD became the Department of Agriculture, Environment, and Rural Affairs (DAERA). The newly reformed and restructured Veterinary Service Animal Health Group (VSAHG) replaced the Veterinary Service effective April 1, 2016 and oversees the VPHP section. As part of a decentralization effort, there is a proposed movement of DARD headquarters from Belfast to the Northwest region.

The FSA has an office in Belfast and is responsible for devolved matters relating to food safety, standards, nutrition, and dietary health in Northern Ireland. FSA roles and responsibilities in Northern Ireland include:

- Advising Ministers on food safety and standards issues,
- Developing policy and proposing legislation,
- Providing timely and effective responses to food and feed incidents,
- Setting standards and auditing district councils' food enforcement activities, and
- Setting standards and auditing meat hygiene enforcement by DARD.

DARD is the competent authority responsible for animal health, including animal movement and animal welfare legislation, residues legislation, and trade matters in Northern Ireland. The VPHP also carries out the work of DARD on behalf of DEFRA, Executive Agency the Veterinary Medicines Directorate (VMD) for medicinal residues and under the UK Health and Safety Executive (HSE) Chemical Residues Directorate (CRD) for pesticide residues.

The VPHP's purpose is the protection of public health and animal welfare in approved meat establishments. In addition, VPHP maintains vigilance for, and deals appropriately with, specified animal diseases. The objectives of VPHP include enforcement of all relevant public health and animal health and welfare legislation, and providing supervision, inspection services, and audits in approved slaughter and cutting establishments. In fulfilling its purpose, the VPHP carries out work on behalf of both DARD and FSA.

While conducting interviews at DARD's headquarters in Belfast, the FSIS auditors verified that VPHP staff are employees of the VSAHG. DARD staff currently consists of 30 Official Veterinarians (OVs), 10 Senior Meat Inspectors (SMIs), 82 Meat Inspectors (MIs), and 10 Poultry Meat Inspectors (PMIs). MIs and PMIs are also known as Official Auxiliaries. Staff are assigned to work in one of 20 Meat Inspection Teams (MITs) located throughout the country. Each MIT is managed by an OV and consists of, in most cases, an SMI, and a number of MIs or PMIs. Four Divisional Veterinary Officers (DVOs) in turn manage MITs. The DVO for the Meat Inspection Branch South East Divisional office in Newry provides oversight for both of the United States eligible establishments. VPHP maintains a number of locum OVs on staff. These are referenced in places as temporary OVs but are actually permanent and full-time VPHP staff assigned to cover assignments for OVs on leave, in training, etc., and is analogous to FSIS "relief" veterinarians.

During the audit, the FSIS auditors verified payment of VPHP salaries at the headquarters, regional office, and establishment level. Payment is through the Northern Ireland Department of Finance. The assigned MIT is responsible for covering any overtime or holiday periods and if used, relief coverage of official veterinarians is by a locum OV on the VPHP staff. FSA-NI bills each establishment incurring overtime on behalf of DARD to cover inspection costs. At the division office, the DVO demonstrated the web-based time and attendance system used by DARD VPHP staff that is linked to FSA headquarters, since FSA is responsible for payment for services defined in the SLA. In addition, the DVO demonstrated the DARD secure intranet that included timesheets and different billing codes used to designate payment by FSA or DARD. Lastly, HRConnect (a Northern Ireland government URL) is used for recording time and attendance of official personnel.

In Northern Ireland, veterinarians are recruited as government veterinary officers, and then trained as OVs to undertake meat hygiene inspection work. To be eligible for training to become an OV, the candidate must:

- Hold a veterinary degree, and
- Be a current member of the Royal College of Veterinary Surgeons.

The employment qualifications for meat inspectors are defined in the European Commission Regulation (EC) No. 854/2004, Annex I, Section III, Chapter IV, B – requirements for Official Auxiliaries. The FSIS auditors were provided a copy of the updated DARD VPHP Manual for OV Training that was implemented in March 2016. The manual describes the training process and requirements pursuant to EC requirements for Official Veterinarians. The CCA provides training in United States requirements through "cascade" training. In addition, VPHP OVs assigned to United States eligible establishments sign up for FSIS email alerts announcing revised requirements and policies. DARD's Total Records and Information Management (TRIM), an electronic document management system, includes containers (folders) for VPHP Training as demonstrated at the divisional office. The DVO provided documents and explained the process for training assessors to review candidate OV classroom hours and scores and practical experience (portfolio of experience). The DVO provided an example *Assessment of Practical Application* (Annex 6) as defined in Regulation (EC) No. 854/2004.

DARD VPHP Official Veterinarians carry two official forms of identification. One is issued by FSA-NI and provides authority for enforcement actions in accordance with EC legislation, while the DARD identification documents the authority to enforce Northern Ireland legislation. Each badge includes a photograph of the employee, an official ID number, and lists the legislative authorities for the employee. The final authorization to become an OV is provided by FSA with DARD's recommendation and confers the FSA badge and authority as an official veterinarian for EC purposes. DARD veterinarians performing other than EC activities carry the separate DARD badge, which confers authorities for domestic requirements only. The OVs assigned to the United States

eligible establishments have been trained in United States requirements, as have personnel in their supervisory chain.

A large portion of the VPHP budget comes from FSA in accordance with the SLA since the primary role of DARD – VPHP is the implementation of official controls in order to ensure that EC regulations (hygiene package) are met. DARD has the authority to assign additional personnel to any establishment but is responsible for all salary and other costs for these employees.

The FSIS auditors' observations of inspection program activities, interviews with inspection personnel, and reviews of inspection records during the on-site audit helped confirm that the CCA has organizational structures and administrative controls in place to support its inspection system, and those regulatory requirements are enforced when so required.

V. COMPONENT TWO: STATUTORY AUTHORITY AND FOOD SAFETY REGULATIONS (INSPECTION SYSTEM OPERATION AND PRODUCT STANDARDS)

The second of six equivalence components that the FSIS auditors reviewed was Statutory Authority and Food Safety Regulations. The system is to provide for humane handling and slaughter of livestock; ante-mortem inspection of animals; post-mortem inspection of carcasses and parts; controls over condemned materials; controls over establishment construction, facilities, and equipment; daily inspection; periodic supervisory visits to official establishments; and requirements for thermally processed/commercially sterile products.

In preparation for this audit, the FSIS auditors reviewed the following Northern Ireland and European laws and regulations that provide the CCA with the legal authority to operate the inspection system and enforce FSIS requirements:

- Regulation (EC) No. 852/2004,
- Regulation (EC) No. 853/2004,
- Regulation (EC) No. 854/2004,
- Regulation (EC) No. 882/2004,
- Regulation (EC) No. 2073/2005,
- Regulation (EC) No. 178/2002,
- Regulation (EC) No. 1099/2009,
- Council Directive 96/22/EC,
- Council Directive 96/23/EC,
- The Food Hygiene and Official Feed and Food Controls Regulations (Northern Ireland) 2009; amended 2014,
- The Food Hygiene Regulations (Northern Ireland) 2006; amended 2010,
- VPHP Manual for Official Controls,
- The Food Standards Act of 1999,
- Service Level Agreement – between FSA and DARD, and

- General Food Regulations (Northern Ireland) 2004.

Welfare at slaughter, including the reception, unloading and handling of animals, is regulated in the EU by Council Regulation (EC) No. 1099/2009 on the protection of animals at the time of killing. In Northern Ireland, the EC Regulation is implemented by The Welfare of Animals at the Time of Killing Regulations (Northern Ireland) 2014. Council Regulation (EC) No. 1099/2009 defines killing as any intentionally induced process, which causes the death of an animal and defines slaughtering as the killing of animals intended for human consumption. They contain the general requirements that any person involved in the killing of animals should take the necessary measures to avoid pain and minimize the distress and suffering of animals during the slaughtering or killing process, taking into account the best practices in the field and the methods permitted under the regulation. There were no regulatory or significant policy changes by either FSIS or Northern Ireland since the last FSIS audit.

Ante-mortem inspection is carried out by the OV upon arrival of the animals at the slaughter establishment. During the on-site audit, the FSIS auditors were able to observe how the OV performed ante-mortem inspection procedures that involved checking records, including food chain information covering movement permits and controls of live animals intended for food from farm to slaughter, of animals arriving for slaughter, and how animals were examined, both at rest and in motion, by the OV. As part of their review of the ante-mortem facilities of the slaughter establishment, the FSIS auditors were also able to observe on-site facilities designated to handle suspect animals. The FSIS auditors also confirmed that the OV verifies and documents humane handling and slaughter requirements on a daily basis, which includes an evaluation of stunning effectiveness.

Post-mortem inspection is an official control required by Regulation (EC) No. 854/2004, Article 5. The EC regulations are implemented in Northern Ireland by the Food Hygiene Regulations (Northern Ireland) 2006. DARD-VPHP provides guidance for implementing policies in the VPHP Manual for Official Controls, Chapter 2.4, Post Mortem. In addition, FSA provides industry guidance in the Meat Industry Guide, Chapter 12, Dressing of Carcasses. The Meat Industry Guide is also utilized as a reference by VPHP inspection personnel and is organized to define the regulatory requirements for Food Business Operators (FBOs) as well as the official controls as required by the EC regulations. The FSIS audit verified government meat inspectors supervised by an SMI conducted post-mortem inspection. An OV provides ante-mortem and post-mortem dispositions as well as compliance verification and oversight. The slaughter process, including carcass and viscera presentation to the post-mortem inspection stations, post-mortem inspection methodology, and relevant records, was reviewed during the FSIS audit. Visual inspection in accordance with revised EC legislation is not approved by FSA or DARD in United States eligible establishments at this time. No concerns were identified.

The FSIS auditors determined that supervisory reviews are being performed at least four times per year but not at a quarterly frequency, as defined by DARD. Multiple

documents are generated for each supervisory review including one copy to the MIT at the plant and a different copy to the FBO. The intent of each copy differs and therefore the content differs as well. While reviewing copies of recent supervisory reviews, the FSIS auditors determined that:

- The auditor found incomplete documentation of follow-up verification activities for findings with requirements outlined in 9 CFR 327.2, paragraphs (a)(2)(ii)(A) through (H), identified during periodic supervisory visits, that were corrected after the supervisory visit. The FSIS auditors reviewed a sample of supervisory visit reports performed by DARD. One such supervisory review identified Sanitation Performance Standards (SPS) findings that were programmed for correction later. Subsequent reports of supervisory visits did not address whether the SPS findings were corrected. However, by presenting additional records, the CCA was able to demonstrate evidence to FSIS that the findings were corrected.

The DARD-VPHP provides for daily inspection at each United States eligible establishment. At the slaughter/processing establishment eligible for exporting pork products to the United States, the batches to be exported to the United States are subject to daily inspection by the MIT included as part of the pre-shipment review and export health certification process. In addition, there is daily verification by VPHP staff of the establishments' Sanitation Standard Operating Procedures (SSOP) procedures. Full-time VPHP staffing is provided at the cold storage warehouse for purposes of export certification. The MIT also provides guidance for OVs who audit compliance with the legislation.

Along with interviews, reviews of establishment and official inspection records, and observations of inspection program activities conducted during the on-site audit, the FSIS auditors were able to confirm that Northern Ireland's meat inspection system continues to have both the legal authority and a regulatory framework to implement regulatory requirements equivalent to those governing the United States' meat inspection system.

VI. COMPONENT THREE: SANITATION

The third of the six equivalence components that the FSIS auditors reviewed was Sanitation. To be considered equivalent to FSIS' program, the CCA is to provide general requirements for sanitation, sanitary handling of products, and development and implementation of SSOPs.

The FSIS auditors reviewed the design and implementation of sanitation programs at the audited establishments and the VPHP OV performing SSOP pre-operational verification. The OV hands-on verification procedures began after the establishment personnel conducted their pre-operational sanitation and determined that the facility was ready for the OV to conduct pre-operational sanitation verification activities. The FSIS auditors also observed in-plant inspection verification of operational sanitation procedures at both audited establishments. These verification activities included direct observation of operations and review of the establishments' associated records.

The FSIS auditors noted that the inspection and establishment records mirrored the actual sanitary conditions of the establishment. The audited establishments maintained sanitation records sufficient to document the implementation and monitoring of the SSOPs and any corrective actions taken. The establishment employees specified as being responsible for the implementation and monitoring of the SSOPs authenticated these records with initials or signatures and the date of observations. No concern arose as the result of this audit.

The FSIS audit of the slaughter establishment included visual observation of the slaughter process. The slaughter line was configured for routine sanitation of all equipment and utensils used in the dressing process with convenient sterilizers at each station. Good sanitary dressing procedures were observed, including sanitizing knives and equipment after each cut.

The VPHP inspectors likewise had sterilizers and sinks at the inspection station for use. The carcass inspector had sufficient time to visually observe each carcass. The "rectification line" is an out rail used by the establishment for all carcasses requiring additional trimming, and VPHP has a carcass inspector stationed on the out rail to visually verify each carcass before it is moved back on to the main chain.

During the on-site tour of the establishments, the FSIS auditor observed a build-up of grease on the ceiling and the overhead structures in the production area of one establishment. In the other establishment, the auditor saw boxes stacked against a freezer wall in a manner the precluded proper access by employees.

In all cases, in response to the observations noted above, the in-plant inspection team and the DVO officially notified the establishments to implement immediate corrective actions, including measures to restore the sanitary conditions.

The on-site verification activities of the sanitation programs conducted by the FSIS auditors verified that the CCA inspection system establishes requirements for sanitary handling of products and for the development and implementation of SSOPs, although the FSIS auditors observed non-compliances with these requirements. The CCA and MIT take active measures to ensure that certified establishments implement effective SSOPs and other sanitary measures that prevent direct contamination and adulteration of products destined for the United States.

VII. COMPONENT FOUR: HAZARD ANALYSIS AND CRITICAL CONTROL POINTS (HACCP) SYSTEMS

The fourth of six equivalence components that the FSIS auditors reviewed was HACCP. The inspection system is to require that each official establishment develop, implement, and maintain a HACCP plan.

Northern Ireland's meat inspection system follows EU requirements for United States eligible establishments, Regulation (EC) 854/2004 and Regulation (EC) 852/2004, where HACCP regulatory requirements are prescribed and found equivalent to 9 CFR Part 417. These requirements are implemented in Northern Ireland under The Food Hygiene Regulations (Northern Ireland) 2006, as amended.

The FSIS auditors evaluated the design and verified the implementation of HACCP systems in establishments that export to the United States. The assessment included review of the establishments' HACCP plans; establishments' records, including establishment pre-shipment review records; and the official records maintained by official inspection personnel. Additionally, the FSIS auditors observed the establishments' operations and verified that establishments had developed, implemented, and maintained HACCP systems for products intended for export to the United States.

The FSIS auditors verified that VPHP personnel conduct and document official verification activities related to HACCP in accordance with regulatory requirements. The inspection personnel verification procedures encompass the evaluation of written HACCP plans and verification of HACCP prerequisites and plan monitoring, corrective actions, and recordkeeping in accordance with Regulation (EC) No. 852/2004 and Regulation (EC) No. 854/2004. Furthermore, VPHP supervisory reviews of HACCP requirements were conducted and well documented in United States eligible establishments.

The FSIS auditors conducted an on-site observation and document review of critical control points (CCPs) in the slaughter/processing establishment, including the zero-tolerance (feces, ingesta, milk) CCP. The FSIS auditors, along with the CCA, observed the establishment employees conducting HACCP monitoring and verification activities for the zero-tolerance and cooling CCPs. The FSIS auditors also reviewed the establishment's zero- tolerance monitoring, verification records, and DARD's Red Meat Carcass Compliance Report, Form VPH-5, completed daily by the MIT to document zero-tolerance verification. The FSIS auditors also confirmed that the physical location for verification activities concerning zero-tolerance was before the final carcass wash.

During the on-site document reviews and interviews of establishment and inspection personnel, the FSIS auditors identified the following HACCP findings:

- A review of monitoring records revealed that not all individual entries on records maintained under the HACCP plan included the date and time recorded, nor were they signed or initialed by the establishment employee making the entry.
- A review of corrective actions taken by the establishment in response to a deviation from a critical limit (carcass chilling) revealed that one of the establishment's prerequisite programs deviated from the critical limit of the HACCP plan for the product being processed. However, the corrective action ensured that no product injurious to health or otherwise adulterated entered commerce.

FSIS requests that DARD provide a description of measures taken to address the above findings. The FSIS auditors' on-site review of records verified that the CCA requires operators of official establishments to develop, implement, and maintain HACCP programs for each processing category, as set forth in United States regulatory requirements and relevant EC and DARD requirements.

VIII. COMPONENT FIVE: GOVERNMENT CHEMICAL RESIDUE TESTING PROGRAMS

The fifth of six equivalence components that the FSIS auditors reviewed was Government Chemical Residue Testing Programs. The inspection system is to present a chemical residue control program, organized and administered by the national government, which includes random sampling of internal organs, fat, and muscle of carcasses for chemical residues identified by the exporting country's meat and poultry inspection authorities or by FSIS as potential contaminants.

The EC residue regulations achieve the United States appropriate level of protection without special conditions. The EC legislation requires Member States to maintain a chemical residue control program, organized and administered by the national government, which includes random sampling of internal organs and fat of carcasses for chemical residues identified by the exporting country's meat and poultry inspection authorities or by FSIS as potential contaminants. EU Member States are responsible for the implementation of: 1) procedures to document disposition of contaminated product, 2) enforcement action against violators, and 3) measures to prevent the recurrence of the same or similar violations.

The United Kingdom Veterinary Medicines Directorate (VMD) is responsible for the implementation of the Residue Monitoring Plan (RMP). The RMP planning group comprises representatives from the VMD, the Agri-Food Biosciences Institute (AFBI), the Animal Health and Veterinary Laboratory Agency (AHVLA), the Food Standards Agency (FSA), the Food and Environment Research Agency (FERA), Marine Scotland Science (MSS), the Centre for Environment, Fisheries, Aquaculture Science (CEFAS), and the competent authority-independent Veterinary Residues Committee (VRC).

An annual Statutory Surveillance Program to analyze samples from food producing animals and their products for residues of veterinary medicines and environmental contaminants is in place in the United Kingdom. In Northern Ireland, DARD VSAHG carries out on-farm sampling of cattle, pigs, and poultry, while VPHP OVs, authorized by the FSA-NI, take samples in slaughterhouses.

In Northern Ireland, two residue-testing programs outside the RMP are in place: the Meat Inspection Scheme and the Risk Scheme. The Meat Inspection Scheme is analogous to FSIS "suspect" testing and is implemented by the OV in the slaughterhouse in response to conditions identified during ante-mortem or post-mortem inspection suggesting elevated risk of veterinary drug residues. VPHP retains sampled carcasses, pending laboratory results. Carcasses are not routinely detained pending results, but a non-

compliant result will trigger follow-up investigation by DARD VSAHG. This may include follow-up sampling. The Risk Scheme is similar to the former pig testing schemes, but has expanded from analysis for antimicrobials to a multi-residue analytical method.

The Animals, Meat and Meat Products (Examination for Residues and Maximum Residue Limits) Regulations (Northern Ireland) 1998 as amended implement Council Directive 96/23/EC and Council Directive 96/22/EC in Northern Ireland. These regulations cover all residues (including growth promoting hormones, beta-agonists, antimicrobial substances, and anthelmintics) and all aspects of residue sampling/testing (including primary surveillance testing, sampling/detention/testing condemnation of suspect carcasses, on-farm investigation and sampling, and subsequent action). All suspects detected at slaughter must be dealt with under the procedures specified in these regulations.

AFBI is a non-departmental public body sponsored by DARD that was established in 2006 as an amalgamation of the DARD Science Service and the Agricultural Research Institute of Northern Ireland (ARINI). DARD funding provides for a major source of the budget of AFBI, which was approximately 34 million pounds in 2016. The AFBI laboratory network includes the Veterinary Sciences Division (VSD), which is organized into four branches. The Chemical and Immunodiagnostic Sciences branch is responsible for veterinary drug residues as well as pesticides, heavy metals, and mycotoxins. At the time of the audit, the pesticide analysis group was in process of moving to the same building as the veterinary drug group. The move is intended to be complete during the summer of 2016.

AFBI is a UK National Reference Laboratory for:

- A1 Stilbenes,
- A2 Thyrostats,
- A3 Steroids & Corticosteroids,
- A4 Zeranol & RALs,
- A5 β-Agonists,
- A6 Nitrofurans Nitroimidazoles,
- B2b Nicarbazin, and
- B2f Carbadox & olaquinadox.

The Residues Action Group (RAG) is comprised of DARD, FSA-NI, and AFBI, and meets at approximately monthly intervals. Attendees represent policy, field, and analytical positions. The purpose includes policy formulation and implementation; review of testing, results, and follow-up actions; reports on quality issues; and reports on turnaround times. Examples of meeting minutes were provided to the FSIS auditors.

The AFBI VSD laboratory is in possession of multiple accreditations, including those issued by the Department of Health of the Government of the United Kingdom for Good Laboratory Practices; the United Kingdom Accreditation Association (UKAS) for

International Standards Organization (ISO) 17025 requirements; and the *Société Générale de Surveillance* (SGS) for ISO 9001 requirements. The FSIS auditors verified the most recent UKAS Schedule of Accreditation, issued February 1, 2016, for the AFBI VSD laboratory.

The AFBI VSD laboratory is audited by the following:

- EU Food & Veterinary Office,
- Community Reference Laboratory,
- UKAS: ISO 17025 annually,
- SGS: ISO 9001 (for research and development), and
- Veterinary Medicines Directorate – central competent authority for United Kingdom national residue plan; two audits of AFBI in the last five years.

ISO 17025 requires proficiency testing and AFBI VSD proficiency testing sources include the Food Analysis Performance Assessment Scheme (FAPAS), Progetto Trieste, and Community Reference Laboratories.

Analytical methods used by the AFBI VSD laboratory include:

- Microbiological inhibition,
- High Performance Thin Layer Chromatography,
- ELISA,
- Biosensor (Optreal Biosensor), and
- LC-MS-MS, primarily used for confirmatory analysis but also anthelmintic screening.

In the government laboratory, the FSIS auditors reviewed records related to sample handling, sample arrival temperature, sampling frequency, timely analysis, data reporting, analytical methodologies and matrices, equipment operation and detection levels, and quality assurance programs. The FSIS auditors' review found that the laboratory conditions, records generated, and results of past UKAS audits met EN ISO/IEC 17025:2005 standards. The FSIS auditors did not identify any findings or areas of concern during the audit of the official laboratory. The FSIS auditors concluded that laboratory personnel are qualified, are adequately trained, are subject to proficiency testing, and are capable of conducting analytical methods, and that the residue laboratory demonstrated the ability to produce timely and accurate data.

IX. COMPONENT SIX: GOVERNMENT MICROBIOLOGICAL TESTING PROGRAMS

The last equivalence component that the FSIS auditors reviewed was Government Microbiological Testing Programs. The system is to implement certain sampling and testing programs to ensure that meat or poultry products produced for export to the United States are safe and wholesome.

Northern Ireland has adopted *Enterobacteriaceae* and Total Viable Count (TVC) in lieu of generic *E. coli* for porcine carcass testing, which FSIS has determined is acceptable for

EU member states eligible to export to the United States. Sampling and testing is the responsibility of the FBO and is verified by the VPHP inspection personnel assigned to the slaughter establishment.

Currently, VPHP personnel collect carcass swabs for *Salmonella* Performance Standards meeting the requirements of 9 CFR Part 310.25. Official *Salmonella* samples are analyzed at the AFBI Sustainable Agri-Food Sciences Division (SAFSD), Food Science Branch (Microbiology) laboratory, which was included in the scope of the audit. *Salmonella* samples are analyzed using FSIS testing methodology. The FSIS document audit of the laboratory focused on analyst qualifications, sample receipt, timely analysis, analytical methodologies, analytical controls, recording and reporting of results, and check samples. The FSIS auditors reviewed a sample of test results, which are noted as *Salmonella* detected/not detected in the area tested per carcass. Positive tests are further analyzed for serotyping and the resulting serovars are included in the sample report. No concern arose as a result of the audit of the AFBI SAFSD laboratory.

Additionally, the establishment is also required to collect, and have analyzed, *Salmonella* carcass swabs in accordance with Regulation (EC) No. 2073/2005. Prior to the FSIS audit, VPHP had performed ongoing verification of establishment corrective actions in response to the slaughter establishment exceeding the EC requirements. The plant had implemented a *Salmonella* improvement plan in December 2015 and taken actions such as mapping any fecal contamination on carcasses to help identify any problem areas at various points along the slaughter process; intensified cleaning of the lairage; and increased sampling for *Salmonella*. During the FSIS audit, review of *Salmonella* sample results verified that the most recent 20 samples spanning 4 weeks' duration were all negative. The DARD-VPHP MIT, including regional supervision, demonstrated active involvement and verification of establishment corrective actions, though no enforcement actions had been taken during this period. The FSIS auditors verified sanitary dressing practices and overall sanitary procedures during the audit. The FSIS audit of the regional office verified that supervisory visits include an emphasis on microbial sampling programs and process hygiene controls at the slaughter establishment.

The FSIS auditors performed an on-site visit of the private laboratory performing *Enterobacteriaceae*, TVC, and *Salmonella* sample analysis for the slaughter establishment. The private laboratory performs proficiency testing administered by Laboratory of the Government Chemist Standards Proficiency Testing as well as internal proficiency tests on a rotating monthly basis. The private laboratory is accredited by UKAS and the scheduled accreditation, February 9, 2016, was verified to include:

- Aerobic Colony Count swabs – NISOPM01 using spread plate technique on pour plate agar at 30° C for 72 hours,
- *Salmonella* spp. Swabs – NISOPM02 based on BS EN ISO 6579:2002 + A1:2007. Confirmation using Microgen biochemical gallery and serology, and
- *Enterobacteriaceae* (presumptive) – NISOPM35 based on BS ISO 21528-2:2004 using plate method.

The FSIS auditors' findings show that Northern Ireland's meat inspection system has a microbiological testing program organized, and administered by the national government requiring *Enterobacteriaceae* and TVC testing by the establishment as a measure of process control and conducts *Salmonella* sampling and testing programs to verify the effectiveness of its system.

X. CONCLUSIONS AND NEXT STEPS

An exit meeting was held on April 22, 2016, in Belfast, Northern Ireland with representatives from DARD and FSA-NI. At this meeting, the FSIS auditors presented the preliminary findings from the audit. The CCA understood and accepted the findings.

An analysis of the findings within each component did not identify any systemic findings that represented an immediate threat to public health. The audit findings indicated a need for improving the documentation of follow-up verification activities for findings with requirements outlined in 9 CFR 327.2, paragraphs (a)(2)(ii)(A) through (H), identified during periodic supervisory visits that were corrected after the supervisory visit. FSIS also identified some operational (or procedural) weaknesses related to Sanitation and HACCP Systems.

During the audit exit meeting, the CCA committed to begin to address the preliminary findings as presented. FSIS will evaluate the adequacy of the CCA's proposed corrective actions once received and base future equivalence verification activities on the information provided.

APPENDICES

Appendix A: Individual Foreign Establishment Audit Checklist

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Karro Food Group 70 Molesworth Road Cookstown Co Tyrone	04/18/2016	UK9052	Northern Ireland
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	J. Rodriguez, DVM and L. Chittum, DVM		[X] ON-SITE AUDIT [ ] 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
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	X
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	X
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
[redacted]	
[redacted]	
[redacted]	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	X
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	
57. Monthly Review	
58.	
59.	

[redacted]

60. Observation of the Establishment

20. A review of corrective actions taken by the establishment in response to a deviation from a critical limit revealed that one of the establishment's pre-requisite programs was in conflict with a critical limit of the HACCP plan for the product being processed. However, the corrective action ensured that no product injurious to health or otherwise adulterated as a result of the deviation entered commerce.

22. A review of monitoring records revealed that each entry did not document the actual result, the time at which each specific event occurred, nor the initials or signature of the establishment employee making each entry.

46. Observed that portions of some overhead structures, such as rails and trolleys, located in the primals cut-up department, had a build-up of grease. Observed plastic totes with what appeared to be small specks of meat/fat/blood particles as well as two plastic totes that had a broken bottom were being returned to the butchery room after being put through an automatic washer. No direct contamination of product was observed. In the packaging/dry storage room, some boxes of packaging material were stacked directly against the walls which precluded official personnel and establishment employees from properly assessing storage conditions along the floor-to-wall junction. In the pork packing room, observed two bloody, wet, wooden pallets in an area adjacent to boxed products.

61. NAME OF AUDITOR	62. AUDITOR SIGNATURE AND DATE
Juan Rodriguez, DVM and Linda Chittum, DVM	

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Granville Food Care Limited Granville Industrial Estate Dungannon Co Tyrone	04/19/2016	UK9022	Northern Ireland
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	J. Rodriguez, DVM and L. Chittum, DVM		[X] ON-SITE AUDIT [ ] 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	O	33. Scheduled Sample	O
8. Records documenting implementation.	O	34. Species Testing	O
9. Signed and dated SSOP, by on-site or overall authority.	O	35. Residue	O
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements		**Part E - Other Requirements**	
10. Implementation of SSOP's, including monitoring of implementation.	O	36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.	O	37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	O	38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.	O	39. Establishment Construction/Maintenance	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements		40. Light	
14. Developed and implemented a written HACCP plan .	O	41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	O	42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.	O	43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.	O	44. Dressing Rooms/Lavatories	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		45. Equipment and Utensils	
18. Monitoring of HACCP plan.	O	46. Sanitary Operations	X
19. Verification and validation of HACCP plan.	O	47. Employee Hygiene	
20. Corrective action written in HACCP plan.	O	48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.	O	**Part F - Inspection Requirements**	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	O	49. Government Staffing	
Part C - Economic / Wholesomeness		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	
24. Labeling - Net Weights		52. Humane Handling	O
25. General Labeling		53. Animal Identification	O
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	O	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.	
[redacted]	O	59.	
[redacted]	O		
[redacted]	O		
[redacted]			

60. Observation of the Establishment

46. Some boxes of frozen product were stacked against the freezer wall and the wall coving which precluded employees from properly assessing storage conditions along the floor-to-wall junction. The condition was notified to establishment management by the CCA who took immediate action to correct it.

61. NAME OF AUDITOR	62. AUDITOR SIGNATURE AND DATE
Juan Rodriguez, DVM and Linda Chittum, DVM	

Appendix B: Foreign Country Response to Draft Final Audit Report

ANNEX A

Comments from the Department of Agriculture, Environment and Rural Affairs (DAERA), Northern Ireland

EXTRACT FROM REPORT - Page 8

The auditor found incomplete documentation of follow-up verification activities for findings with requirements outlined in 9 CFR 327.2 paragraphs (a)(2)(ii)(A) through (H), identified during periodic supervisory visits. The FSIS auditors reviewed a sample of supervisory visit reports performed by DARD. One such supervisory review identified Sanitation Performance Standards (SPS) findings that were programmed for correction later. Subsequent reports of supervisory visits did not address whether the SPS findings were corrected. However, by presenting additional records, the CCA was able to demonstrate evidence to FSIS that the findings were corrected.

DAERA COMMENTS

During the FSIS audit in April DARD presented follow- up records to FSIS which documented follow up in a timely fashion, but which had been generated as a separate report from the original report issued. FSIS requested that these follow up findings are documented on the original report, and/or closure of the original report document, with transfer of outstanding issues to the subsequent supervisory report.

DAERA confirm that FSIS recommendation has been implemented into supervisory audit procedures.

EXTRACT FROM REPORT - Appendix B

Karro Food Group –UK 9052
70 Molesworth Road
Cookstown
Co Tyrone

60. Observation of the Establishment

20. A review of corrective actions taken by the establishment in response to a deviation from a critical limit revealed that one of the establishment's pre-requisite programs was in conflict with a critical limit of the HACCP plan for

the product being processed. However, the corrective action ensured that no product injurious to health or otherwise adulterated as a result of the deviation entered commerce.

22. A review of monitoring records revealed that each entry did not document the actual result, the time at which each specific event occurred, nor the initials or signature of the establishment employee making each entry.

46. Observed that portions of some overhead structures, such as rails and trolleys, located in the primals cut-up department, had a build-up of grease. Observed plastic totes with what appeared to be small specks of meat/fat/blood particles as well as two plastic totes that had a broken bottom were being returned to the butchery room after being put through an automatic washer. No direct contamination of product was observed. In the packaging/dry storage room, some boxes of packaging material were stacked directly against the walls which precluded official personnel and establishment employees from properly assessing storage conditions along the floor-to-wall junction. In the pork packing room, observed two bloody, wet, wooden pallets in an area adjacent to boxed products.

DAERA COMMENTS

DAERA had a post audit discussion with the Food Business Operator (FBO) outlining above non compliances and requested FBO follow up actions, the details and outcome of which are contained below.

20. Karro has amended work procedure 10/004 for Carcase Temperature Monitoring to refer to 7°C as the definitive temperature limit to be reached within 24 hours of chilling. Above 7°C action is taken to suspend emptying of chill and hold the meat under supervision for further investigation and chilling. Carcases exceeding 5°C but under 7°C can be processed, however once a carcase exceeding 5°C has been recorded, the temperature of each carcase is monitored until the chill has been emptied. The Critical Limit of CCP 2 as described in the HACCP plan remains at 7°C. The revised procedure has been attached for your reference (Annex B).

22. Karro has procured an IT system from Hellenic (site IT provider). The design of this system has been approved by DAERA as allowing Karro to meet the HACCP documentation requirements for export to US. Specifically it will facilitate recording of operative findings for each CCP check. Data will be generated for each individual carcase checked for compliance at CCP 1, recording inspector's name, time of check, carcase number, result (contamination absent/present) and corrective actions taken in the case of a failure. This will be completed for 100% of carcases processed. The new IT system will be installed and accessed through a terminal on the slaughter line at the zero tolerance CCP 1 location. Karro advise that this will be operational in August 2016. DAERA will

subsequently confirm to FSIS when this installation has been completed and the system is fully operational.

46.
Overhead structures
The issue of build up of grease on rails and containers in primal area was raised at management tier meetings. Retraining of staff on acceptable standards for SSOP checks was carried out. A full deep clean was scheduled and overseen by senior management. The increased level of greasing of rails that had been initiated on commission of the new chill facility in April 2016 has been reduced to normal levels. Daily SSOP checks and monthly hygiene audits carried out by Karro confirm that the acceptable standards are being adhered to.

Plastic Containers
The issue of contamination of plastic crates and broken crates in circulation was raised for action at Karro management meetings. The process for cleaning of crates and integrity assessment has been reviewed. Additional resource has been allocated to inspect all trays post wash for satisfactory cleaning and integrity. Damaged trays have been removed from the system, and continue to be, on an ongoing basis. Supervisors and managers have been instructed to focus on condition of food contact surfaces. This is verified during regular GMP audits.

Packaging Store
Demarcation lines have been painted on the floor of the packaging store to identify boundary for storage of packaging, to facilitate assessment of storage conditions along the wall and coving. Regular GMP audits have verified correct storage of packaging/dry storage room.

Control of Wooden Pallets
This issue was raised at management tier meetings. Yard personnel have been retrained to inspect all pallets prior to entry to the factory. Any damaged, dirty or wet pallets are rejected. Ongoing GMP audits verify compliance.

Pre-operational and operational checks carried out by DAERA on an ongoing basis have focused on the above hygiene issues. . These have confirmed that the above issues have been addressed in a satisfactory manner.

EXTRACT FROM REPORT - Appendix B

Granville Food Care Limited - UK 9022
Granville Industrial Estate
Dungannon
Co Tyrone

46. Some boxes of frozen product were stacked against the freezer wall and the wall coving which precluded employees from properly assessing storage conditions along the floor-to-wall junction. The condition was notified to establishment management by the CCA who took immediate action to correct it.

DAERA COMMENTS

46.
Action taken subsequent to the FSIS audit:

1. DAERA requested Granville Food Care to amend the relevant work procedure to specify that contact between boxes of meat and the wall, coving or other such surfaces is not permitted, and to retrain cold store staff in the revised procedure accordingly.
2. DAERA requested Granville Food Care to implement daily checks to verify correct storage conditions, that there is no wall contact, and no issues with pest control in the space between the pallets and the wall.
3. DAERA staff on site at Granville Food Care have added a specific check for contact of box with wall /coving to DAERA's existing regular check of USDA product for segregated storage in its designated location within the cold store.

All of the above have been actioned and are in place. DAERA can report that storage conditions of product destined for US export meet the necessary requirements.