

United States Department of Agriculture

Food Safety and Inspection Service

1400 Independence Avenue, SW. Washington, D.C. 20250 Ms Hrönn Ólína Jörundsdóttir, Director General Icelandic Food and Veterinary Authority, MAST Austurvegur 64 800 Selfoss, Iceland

Dear Ms. Jörundsdóttir,

The United States Department of Agriculture (USDA), Food Safety and Inspection Service (FSIS) conducted an onsite verification audit of Iceland's inspection system September 18–25, 2023. Enclosed is a copy of the final audit report. The comments received from the Government of Iceland are included as an attachment to the report.

Sincerely,

MARGARET BURNS RATH Date: 2024.04.10 14:53:41 -04'00'

Margaret Burns Rath, JD, MPH Acting International Coordination Executive Office of International Coordination

Enclosure

April 10, 2024

FINAL REPORT OF AN AUDIT CONDUCTED OF

ICELAND

SEPTEMBER 18–25, 2023

EVALUATING THE FOOD SAFETY SYSTEM GOVERNING RAW LAMB AND MUTTON PRODUCTS EXPORTED TO THE UNITED STATES OF AMERICA

April 9, 2024

Food Safety and Inspection Service U.S. Department of Agriculture

Executive Summary.

This report describes the outcome of an onsite equivalence verification audit of Iceland conducted by the U.S. Department of Agriculture's Food Safety and Inspection Service (FSIS) September 18–25, 2023. The purpose of the audit was to verify whether Iceland's food safety inspection system governing lamb and mutton products remains equivalent to that of the United States, with the ability to export products that are safe, wholesome, unadulterated, and properly labeled and packaged. Iceland currently exports raw intact lamb products to the United States.

The audit focused on six system equivalence components: (1) Government Oversight (e.g., Organization and Administration); (2) Government Statutory Authority and Food Safety and Other Consumer Protection Regulations (e.g., Inspection System Operation, Product Standards and Labeling, and Humane Handling); (3) Government Sanitation; (4) Government Hazard Analysis and Critical Control Point (HACCP) System; (5) Government Chemical Residue Testing Programs; and (6) Government Microbiological Testing Programs.

An analysis of the finding noted below did not identify any deficiencies that represented an immediate threat to public health.

GOVERNMENT OVERSIGHT (e.g., ORGANIZATION and ADMINISTRATION)

• The Icelandic Food and Veterinary Authority (MAST), as the Central Competent Authority (CCA), has a provision that allows retesting of samples with violative results from chemical residue testing. MAST has not provided written documentation to ensure that these retested meat products cannot be exported to the United States.

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

TABLE OF CONTENTS

I.	INTRODUCTION1
II.	AUDIT OBJECTIVE, SCOPE, AND METHODOLOGY1
III.	BACKGROUND
IV.	COMPONENT ONE: GOVERNMENT OVERSIGHT (e.g., ORGANIZATION AND ADMINISTRATION)
V.	COMPONENT TWO: GOVERNMENT STATUTORY AUTHORITY AND FOOD SAFETY AND OTHER CONSUMER PROTECTION REGULATIONS (e.g., INSPECTION SYSTEM OPERATION, PRODUCT STANDARDS AND LABELING)8
VI.	COMPONENT THREE: GOVERNMENT SANITATION10
VII.	COMPONENT FOUR: GOVERNMENT HAZARD ANALYSIS AND CRITICAL CONTROL POINT (HACCP) SYSTEM
VIII.	COMPONENT FIVE: GOVERNMENT CHEMICAL RESIDUE TESTING PROGRAMS
IX.	COMPONENT SIX: GOVERNMENT MICROBIOLOGICAL TESTING PROGRAMS
X.	CONCLUSIONS AND NEXT STEPS
APPI	ENDICES16
Ар	ppendix A: Individual Foreign Establishment Audit Checklists
Ap	pendix B: Foreign Country Response to the Draft Final Audit Report

I. INTRODUCTION

The Food Safety and Inspection Service (FSIS) of the U.S. Department of Agriculture (USDA) conducted an onsite audit of Iceland's food safety inspection system September 18–25, 2023. The audit began with an entrance meeting on September 18, 2023, in the Central Competent Authority (CCA) — Matvælastofnun (Icelandic Food and Veterinary Authority — MAST's) import and export department at Hafnarfjörður, Iceland, during which the FSIS auditor discussed the audit objective, scope, and methodology with representatives from MAST. Representatives from MAST accompanied the FSIS auditor throughout the entire audit. The audit concluded with an exit meeting conducted remotely via video conference on September 25, 2023.

II. AUDIT OBJECTIVE, SCOPE, AND METHODOLOGY

This was a routine ongoing equivalence verification audit. The audit objective was to verify whether the food safety inspection system governing lamb and mutton products remains equivalent to that of the United States, with the ability to export products that are safe, wholesome, unadulterated, and properly labeled and packaged. Iceland is eligible to export the following categories of products to the United States:

Process Category	Product Category	Eligible Products ¹
Raw - Non Intact	Raw Ground, Comminuted,	Lamb and Mutton - All
	or Otherwise Non-Intact	Products Eligible except
	Meat-Other (Sheep, Goat)	Mechanically Separated and
		Advanced Meat Recovery
		Product
Raw - Intact	Raw Intact Meat-Other	Lamb and Mutton - All
	(Sheep, Goat)	Products Eligible

The USDA's Animal and Plant Health Inspection Service (APHIS) recognizes Iceland as free of foot-and-mouth disease.

Prior to the onsite equivalence verification audit, FSIS reviewed and analyzed Iceland's Self-Reporting Tool (SRT) responses and supporting documentation, including official chemical residue sampling plan and results and requirements for establishments to implement microbiological sampling and testing programs for indicator organisms. During the audit, the FSIS auditor conducted interviews, reviewed records, and made observations to verify whether Iceland's food safety inspection system governing raw lamb and mutton products is being implemented as documented in the country's SRT responses and supporting documentation.

FSIS applied a risk-based procedure that included an analysis of country performance within six equivalence components, product types and volumes, frequency of prior audit-related site visits, point-of-entry (POE) reinspection and testing results, specific oversight activities of government offices, and testing capacities of laboratories. The review process included an analysis of data

¹ All source meat used to produce products must originate from eligible countries and establishments certified to export to the United States.

collected by FSIS over a 3-year period, in addition to information obtained directly from MAST through the SRT.

Determinations concerning program effectiveness focused on performance within the following six components upon which system equivalence is based: (1) Government Oversight (e.g., Organization and Administration); (2) Government Statutory Authority and Food Safety and Other Consumer Protection Regulations (e.g., Inspection System Operation, Product Standards and Labeling, and Humane Handling); (3) Government Sanitation; (4) Government Hazard Analysis and Critical Control Point (HACCP) System; (5) Government Chemical Residue Testing Programs; and (6) Government Microbiological Testing Programs.

The FSIS auditor reviewed administrative functions at MAST's headquarters and two local inspection offices within the establishments. The FSIS auditor evaluated the implementation of control systems in place that ensure the national system of inspection, verification, and enforcement is being implemented as documented in the country's SRT responses and supporting documentation.

The two establishments currently certified by MAST to export to the United States were selected for the current audit. The products these establishments produce and export to the United States include raw lamb and mutton.

During the establishment visits, the FSIS auditor paid particular attention to the extent to which industry and government interacted to control hazards and prevent noncompliance that threatens food safety. The FSIS auditor assessed MAST's ability to provide oversight through supervisory reviews conducted in accordance with FSIS equivalence requirements for foreign food safety inspection systems outlined in Title 9 of the United States Code of Federal Regulations (9 CFR) 327.2.

The FSIS auditor also visited a third-party (private) microbiological and a third-party (private) chemical residue testing laboratory to verify that these laboratories are capable of providing adequate technical support to the food safety inspection system.

Competent Authority Visits		#	Locations		
Competent Authority Central		1	 Icelandic Food and Veterinary Authority (MAST), Selfoss 		
	Districts	2	Northwest District Office, HvammstangiSouth District Office, Selfoss		
Laboratories		2	 Sýni ehf, Laboratory Service (third-party, microbiological), Reykjavik Matís Laboratory (third-party, chemical residues), Reykjavik 		
Lamb slaughter and raw processing establishments			 Establishment A022, Sláturhús KVH, Hvammstangi Establishment A081, Sláturfélag Suðurlands, Selfoss 		

FSIS performed the audit to verify that the food safety inspection system meets requirements equivalent to those under the specific provisions of United States laws and regulations, in particular:

- The Federal Meat Inspection Act (21 United States Code (U.S.C.) Section 601 et seq.);
- The Humane Methods of Slaughter Act (7 U.S.C. Sections 1901-1907); and
- The Meat Inspection Regulations (9 CFR parts 301 to the end).

The audit standards applied during the review of Iceland's inspection system for raw lamb and mutton 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 World Trade Organization's Agreement on the Application of Sanitary and Phytosanitary Measures.

III. BACKGROUND

From June 1, 2020, to May 31, 2023, FSIS import inspectors performed 100 percent reinspection for labeling and certification on 123,492 pounds of lamb products exported by Iceland to the United States. Of these amounts, additional types of inspection were performed on 224 pounds of lamb products. These additional types of inspection included physical examination and chemical residue analysis. As a result of these additional inspections, no products were rejected either for issues related to public health or reasons other than public health, such as shipping damage, certificate, labeling, or other miscellaneous issues.

The previous FSIS audit in 2021 identified the following finding:

Summary of the Finding from the 2021 FSIS Audit of Iceland
Component 1: Government Oversight (e.g., Organization and Administration)

• MAST failed to provide the District Veterinary Officer (DVO) of one district adequate training when promoting the individual to the position. The new DVO was unaware of individual reports that were required monthly during slaughter operation.

The FSIS auditor verified that the corrective actions for the previously reported finding were implemented and effective in resolving the finding.

The most recent FSIS final audit reports for Iceland's food safety inspection system are available on the FSIS website at: <u>www.fsis.usda.gov/foreign-audit-reports</u>.

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

The first equivalence component the FSIS auditor reviewed was Government Oversight. FSIS import regulations require the foreign food safety inspection system to be organized by the national government in such a manner as 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.

MAST is part of the Department of Food, Agriculture and Rural Affairs (DFARA) within the Ministry of Industries and Innovation. DFARA is responsible for policy development and coordination and plays a crucial role in the legislative process, including the transposition of the European Union (EU) legislation. MAST is led by a general director who is responsible for overseeing five different offices and is supported by administrative and legal affairs offices as well as a quality assurance manager. Five offices that fall directly under MAST's general directorate include: Animal Health and Welfare; Food Safety and Consumer Affairs; Import and Export; Coordination; and Agriculture Affairs. The Coordination Office liaisons with other offices within and outside MAST in matters of food, feed and animal health and welfare. Except for the office of animal health and welfare, which is headed by the chief veterinary officer (CVO), all other offices are led by a director or head of the office. MAST has deployed field staff, which is supervised by one of the four district veterinary officers (DVO) or their designee. The DVOs directly report to the office of the CVO. The Office for Animal Health and Welfare and the district offices are responsible for daily inspection in the two slaughterhouses certified to produce products intended for export to the United States. The Office for Consumer Protection is responsible for performing inspections based on risk classification and setting up inspection teams to conduct risk-based audits. The lead official veterinarians (Lead OV) in the two audited lamb slaughter establishments are responsible for supervising the post-mortem inspection activities carried out by other official veterinarians (OV) assigned to work at the establishments. The FSIS auditor confirmed that there have been no major changes in MAST's organizational structure since the prior FSIS audit in 2021. The FSIS auditor interviewed the DVO to assess his knowledge and training to perform his duties related to the certification of products to the United States and did not identify any concerns.

MAST's authority to administer the inspection system, enforce food safety laws, and require corrective actions after instances of noncompliance are grounded in Act No. 80/2005 (Act on Food and Veterinary Authority) and Act No. 93/1995 (Food Law). Additionally, Act No. 66/1998 (Act on Veterinarians and Animal Health) and Act No. 55/2013 (Act on Animal Welfare) are national legislations MAST enforces to protect animal health and welfare. Iceland, under the Agreement of the European Economic Area, to which the country is a signatory, has transposed all applicable EU laws and regulations, including Regulation (EU) 2017/625.

Articles 8 and 11 of Act No. 93/1995 provide the regulatory definitions of adulterated and misbranded product, respectively. Article 1 of Act No. 96/1997 (Raising and Health of Slaughter Animals, Slaughtering, Processing, Health Inspection and Quality Grading of Slaughter Products; the Foodstuff), gives MAST the legal authority to conduct inspection activities to ensure that products are wholesome, evaluated and classified by type and quality, and not adulterated or misbranded. MAST requires all establishments to prepare and maintain a written recall procedure and has a mechanism in place to notify FSIS if noncompliant or adulterated products are certified for export and shipped to the United States. Additionally, MAST utilizes the EU Rapid Alert System for Food and Feed (RASFF) when adulterated products are received or enter commerce. Through RASFF, alerts and warnings are immediately posted when risks to public health are detected in the food chain. MAST has the authority to recall adulterated product and the ability to seize and dispose of product if deemed necessary. There have been no recalls of meat products exported from Iceland to the United States since the previous FSIS audit in 2021. To ensure product is not adulterated and correctly labeled, government inspection personnel perform routine verification activities continuously during slaughter operations and at least once per production shift during the processing of raw lamb products in all the establishments certified to export to the United States. The FSIS auditor verified that MAST has the authority and responsibility to ensure that adulterated or misbranded product is not exported to the United States. The FSIS auditor further verified that labels and marks of inspection are approved by MAST.

The FSIS auditor verified through interviews and record reviews that the government inspection personnel assigned to the establishments certified to export to the United States are civil servants and are hired and paid by the Icelandic government. Pertaining to the requirements of prevention of conflict-of-interest situations, Article 20 of Law No. 70/1996 (Act on the Rights and Duties of Civil Servants) furnishes the legal provision to prohibit MAST staff, including government inspection personnel from engaging in any activities other than acting in the public interest. The FSIS auditor's interviews and document review did not raise any concerns.

MAST follows Article 6 of Law No. 70/1996 that requires all Icelandic government employees meet a basic educational requirement. In Iceland, all government inspection personnel are required to be veterinarians. The FSIS auditor confirmed that MAST requires that all OVs must have a doctor of veterinary medicine or equivalent degree. The FSIS auditor reviewed documentation for a select number of OVs assigned to the establishments certified to export to the United States to verify that they had the required veterinary degree. MAST continues to provide written instructions and ongoing training to its inspection force. Prior to the start of lamb slaughter season, which spans from August through October each year, newly hired OVs receive training in all aspects of slaughter inspection as well as courses in regulatory requirements, including specific FSIS import requirements. The Better Training for Safer Food (BTSF) course offered by the EU's BTSF academy is also available to both OVs returning to work for the slaughter season, as well as to newly hired veterinarians to complete the training. Communication, including recent FSIS import requirements between the headquarters in Selfoss and the district offices and down to the field staff level stationed at the establishments, are held utilizing MAST's intranet known as IS-leyfur Innskráning (mast.is). This intranet site is also used to post events, announcements, news, training activities, and other information that needs to be distributed within MAST. The documents reviewed at the audited local inspection offices confirmed that the new hires received both theoretical and practical training prior to being assigned to their respective assignments.

MAST draws its authority to certify a new establishment or delist an establishment for reasons such as not meeting FSIS' import requirements through specific provisions prescribed in Act No. 93/1995. Establishments wishing to export must submit documentation to support that they meet both Icelandic requirements and those related to specific requirements for products intended for export to the United States. MAST assigns an audit team to verify that the establishment meets FSIS import requirements upon receiving notice of their readiness for the next step of the certification process from the requesting establishment. If all requirements are met, MAST

updates the list of eligible establishments and then submits the list to FSIS. The FSIS auditor's verification of the requirement did not raise any concerns.

The FSIS auditor confirmed through establishment visits in conjunction with document review and interviews with the inspection officials that MAST has deployed adequately trained OVs to conduct government inspection during all slaughter operations and at least once per production shift during the processing of meat products intended for export to the United States. Each certified establishment slaughtering lambs was provided with three OVs to conduct post-mortem inspection and a lead OV responsible for ante-mortem inspection, disposition of retained carcass for pathology, and off-line inspection activities, including daily pre-operational sanitation verification during the slaughter season and zero tolerance verification. The FSIS auditor reviewed a sample of MAST's Daily Control in Slaughterhouses checklist and confirmed that government inspection personnel record official inspection activities in the referenced checklist as required. MAST's supervisory chain of command ensures that sufficient government inspection personnel are present to cover unforeseeable absences or to fill vacancies due to planned leave. No concerns were identified as a result of the FSIS auditor's verification of this equivalence criteria.

The FSIS auditor reviewed the export certification process by selecting documents associated with products exported to the United States. The FSIS auditor verified that only eligible source materials derived from ovine species born and raised in Iceland are used to produce products intended for export to the United States. Iceland does not import raw source materials to further process product for export to the United States. The meat products destined for export to the United States are certified by officials at the office of import and export at MAST, where FSIS import requirements are verified before the official certificate of health is signed and stamped. The shipment document received and verified at MAST includes a products compliance checklist and loading document completed and signed by the DVO having jurisdiction over the exporting establishment. Prior to submitting the health certificate to the import and export office for signature, the DVO's office ensures that the certificate is accompanied by analytical test results on the product, pictures of the product container, seal information, and packing list. A shipment number and the mode of shipment (e.g., ship or aircraft) must also be indicated in the shipping documents. The FSIS auditor further determined that OVs at the audited establishments maintain all accountable stationery, seals, and mark of inspection in a secured environment. No issues were identified as result of the FSIS auditor's verification activities.

Except as noted below, MAST maintains administrative and technical support for its laboratory system by implementing Regulation (EU) 2017/625, which requires laboratories that carry out sample analysis to operate in accordance with International Organization for Standardization/International Electrotechnical Commission (ISO/IEC) 17025 standards. MAST relies on the Icelandic Board for Technical Accreditation (ISAC) for accreditation on behalf of the Icelandic government, per Article 1 of Act No. 24/2006 (Laboratory Accreditation). In Iceland, Sýni, a third-party (private) laboratory, conducts microbiological testing for process hygiene criteria per Commission Regulation (EC) No. 2073/2005. The Matís laboratory, another third-party (private) laboratory, is contracted by MAST and designated as a reference laboratory in Iceland for chemical residue testing. Matís laboratory is responsible for conducting analysis on samples for detection of chemical residues. However, is limited to testing for heavy metals.

MAST also contracts both laboratories (Sýni and Matís) to accept, register, and ship official chemical residue samples to three other foreign third-party laboratories for chemical residue testing other than for heavy metals.

The foreign laboratories, Livsmedelsverket Biologiavdelningen and Eurofins Food and Feed Testing, both located in Sweden and Fødevarestyrelsen, located in Denmark, are contracted by MAST to analyze official chemical residue samples (other than for heavy metals). For foreign laboratories, ISAC has an agreement with the Swedish Board for Accreditation (SWDAC) and Conformity Assessment and the Danish Accreditation Fund (DANAK), accreditation bodies in Sweden and Denmark, respectively, to perform assessments on its behalf. Every year, ISAC reviews audits conducted by SWEDAC or DANAK on behalf of MAST. MAST relies on ISAC's reviews to make decisions on renewing the agreement with the foreign third-party laboratories. The FSIS auditor reviewed the ISO/IEC 17025 accreditation certificates and scopes of accreditation as well as the current agreements provided by MAST for the foreign third-party contracted laboratories referenced above and confirmed the laboratories were in good standing with the accrediting bodies. The FSIS auditor confirmed through records review that all sample results from foreign third-party laboratories were reported to MAST in a timely manner.

During the visit to the Matís laboratory, the FSIS auditor reviewed the laboratory's sample receipt/handling, sample identification system, equipment calibration, maintenance of analyst training, and results reporting. The FSIS auditor conducted interviews with the laboratory supervisory staff and reviewed records pertinent to analyst proficiency, supervisory checks, and internal audits. The FSIS auditor's review of the scope of accreditation and summary of findings and corrective actions proffered by the laboratory in response to external audits indicated that the laboratory was in good standing with the ISAC. Icelandic Regulation No. 106/2010 requires that laboratories report results directly to the MAST. In the case of a violative sample, the laboratory immediately notifies MAST via email; the CVO of meat inspection and DVO evaluate the results and determine if enforcement actions are necessary per Icelandic Regulation No. 30/2012 (Residue Control in Animal Products). The FSIS auditor interviewed laboratory personnel on chemical residue sample receipt and handling, including checking sample integrity and security, registration of the sample per the laboratory quality assurance system, assigning the identification and storage of samples, and packaging of samples for shipment in accordance with the laboratory's standard operating procedure.

During the verification of this component, the FSIS auditor identified the following systemic finding:

• MAST has a provision that allows retesting of samples with violative results from chemical residue testing. MAST has not provided written documentation to ensure that these retested meat products cannot be exported to the United States.

The FSIS auditor verified that Iceland's government administers the country's food safety inspection system. MAST officials enforce laws and regulations governing production of lamb and mutton products at establishments certified to export to the United States. However, MAST does not implement procedures to ensure that products that are retested in response to a violative chemical residue test result are ineligible for export to the United States. The FSIS auditor reviewed recent inspection records and did not identify any circumstances

where retested samples with violative test results had been exported to the United States. MAST committed to address this finding as presented. FSIS will evaluate the adequacy and implementation of MAST's proposed corrective actions during the next scheduled verification audit.

V. COMPONENT TWO: GOVERNMENT STATUTORY AUTHORITY AND FOOD SAFETY AND OTHER CONSUMER PROTECTION REGULATIONS (e.g., INSPECTION SYSTEM OPERATION, PRODUCT STANDARDS AND LABELING, AND HUMANE HANDLING)

The second equivalence component the FSIS auditor reviewed was Government Statutory Authority and Food Safety and Other Consumer Protection Regulations. The system is to provide for humane handling and slaughter of livestock; ante-mortem inspection of all animals; postmortem inspection of every carcass and its parts; controls over condemned materials; controls over establishment construction, facilities, and equipment; at least once per shift inspection during processing operations; and periodic supervisory visits to official establishments.

The FSIS auditor assessed measures applied by MAST to ensure that animals are handled and slaughtered humanely. MAST implements provisions in Council Regulation (EC) No. 1099/2009 that requires humane handling and slaughter of livestock through Icelandic Regulation No. 911/2012. Icelandic Regulation No. 911/2012 contains specific humane handling requirements that must be met by the slaughter establishments. The requirements for humane handling and slaughter of livestock in Icelandic Regulation No. 911/2012 have been integrated into the Daily Supervision of the Slaughter of Sheep, Pigs, and Large Animals Manual (hereinafter referred as Daily Supervision Manual) for OVs to follow when conducting their verification activities. The FSIS auditor observed OVs conducting humane handling verifications, which included checking the required delivery of amperage and correct placement of electrodes on lambs being stunned, followed by examination of post-stunning responses in animals to ensure the effectiveness of stunning. All pens were provided with water, and feed was to be provided in troughs if animals were kept overnight. The FSIS auditor did not identify any issues of concern.

In accordance with Regulation (EU) 2017/625, Article 11 of Act No. 96/1997, and Icelandic Regulation No. 461/2003, MAST ensures that government inspection personnel perform antemortem inspection of all lamb and sheep presented for slaughter. Instructions to perform antemortem inspection in certified slaughter establishments are contained in Daily Supervision Manual and MAST's Control Guide for Slaughterhouses. OVs supervise the arrival of animals at the slaughter establishments, perform ante-mortem inspection of all animals at rest and in motion in designated holding areas, and make dispositions of the inspected animals. OVs review the incoming documents of each truck, including registration and owner identification documents for traceability of the animal to its source, statements on the health of the animal, animal welfare controls reports, and reports of the detection of any animal diseases. The FSIS auditor, through records reviews and interviews of government inspection personnel, determined that the field staff responsible for conducting ante-mortem inspection activities adhered to MAST's requirements. MAST provides the instructions in Daily Supervision Manual on post-mortem inspection in certified slaughter establishments that are based on specific requirements stipulated in Regulations (EC) No. 853/2004, Regulation (EU) 2017/625, and Icelandic Regulation No. 461/2003. The FSIS auditor reviewed the implementation of post-mortem inspection examinations through review of inspection records, interviews, and observations of post-mortem inspection activities in the audited lamb slaughter establishments. The FSIS auditor toured the slaughter floor and observed slaughter operations and official inspection activities being conducted. The FSIS auditor correlated the line speed with the number of inspectors conducting post-mortem inspection and determined that MAST has provided adequate number of inspectors to manage the slaughter volume with the line speed that meets the Icelandic and EU requirements. The FSIS auditor observed that the carcass inspection and visual inspection and palpation of required visceral organs were being performed per Daily Supervision Manual. The FSIS auditor's review of post-mortem requirements did not raise any concerns.

During the slaughter season, periodic supervisory reviews are conducted each month and are performed by representatives from the DVO's office in collaboration with the Office of Consumer Protection, Food Control Team (FCT). The DVO's office is also responsible for conducting the annual assessment of OV performance for their respective districts. Supervisory reviews are conducted in accordance with the Daily Inspections Manual, and findings and corrective actions documented in supervisory reports are also entered by MAST into mast.is. If follow-up is required as a result of a supervisory review, the FCT verifies the appropriate and effective corrective actions have been implemented. The FSIS auditor reviewed the recent supervisory reports for the two lamb slaughter establishments and determined that findings identified during supervisory review by the joint DVO and FCT team were followed up by the FCT to verify the establishment had addressed major concerns and fixed maintenance related issues. No concerns were identified by the FSIS auditor regarding implementation of MAST's periodic supervisory reviews.

Icelandic establishments use raw material derived from their own slaughter production and maintain separation from species other than ovine through separate slaughter lines. Additionally, MAST requires any establishment slaughtering multiple species to routinely conduct species testing. The FSIS auditor verified that speciation samples are collected once every month during the lamb slaughtering season. The OVs in certified establishments control products from non-certified establishments ensuring they are not received and processed in certified establishments. The FSIS auditor confirmed through records review that the audited establishments processed only meat from lambs that were slaughtered on premises and did not receive any raw materials from outside sources. Interviews with the OVs indicated that government inspection personnel were fully aware of animal health restrictions; however, there are no current APHIS restrictions in place for Iceland for lamb or mutton products intended for export to the United States.

The control of animal by-products, including condemned materials, is accomplished through the application of Regulation (EC) No. 1069/2009 and Commission Regulation (EU) No. 142/2011, which are implemented through Icelandic Regulation No. 674/2017. MAST's Daily Supervision Manual provides procedures for the verification of the condemnation of animal by-products by government inspection personnel. The FSIS auditor verified through observation and record

review that OVs ensure condemned and inedible materials are controlled and not used to produce human food or for products intended for export to the United States.

The FSIS auditor concluded that MAST continues to maintain the legal authority, a regulatory framework, and adequate verification procedures to ensure sufficient official regulatory control using statutory authority consistent with criteria established for this component. The FSIS auditor also identified an isolated finding regarding a maintenance issue at one of the pens of an audited establishment that had the potential for causing injury to the lambs moving through this area. This isolated finding is noted in the individual establishment checklist provided in Appendix A of this report.

VI. COMPONENT THREE: GOVERNMENT SANITATION

The third equivalence component the FSIS auditor reviewed was Government Sanitation. The FSIS auditor verified that the CCA requires each official establishment to develop, implement, and maintain written sanitation standard operating procedures (Sanitation SOPs) to prevent direct product contamination or insanitary conditions, and to maintain requirements for sanitation performance standards (SPSs) and sanitary dressing.

MAST implements the requirements in Regulation (EC) Nos. 852/2004 and 853/2004 regarding sanitary operations in establishments through the issuance of 1) Inspection Manual for Daily Work Activities in Slaughterhouses for Sheep, Pig, and other Large Species (hereinafter referred as Inspection Manual for Daily Work Activities in Slaughterhouses), 2) noncompliance reports, and 3) Form GAT-019.2, Daily Control in Slaughterhouses. MAST implements procedures consistent with FSIS sanitation requirements described in 9 CFR 416.11-416.16. The FSIS auditor confirmed that the certified establishments have developed and implemented procedures for sanitary dressing of lamb and sheep throughout slaughter operations. The written procedures reviewed by the FSIS auditor included Sanitation SOPs and prerequisite programs to prevent contamination of lamb carcasses and parts by fecal matter, ingesta, and milk. The FSIS auditor observed MAST's off-line OVs conducting zero tolerance verification activities to ensure the lamb carcasses were free of visible fecal material, ingesta, and milk prior to entering the coolers. When insanitary conditions or carcasses were identified with visible contamination, the OVs exercised regulatory authority to take appropriate enforcement action in accordance with Article 30 of Act No. 93/1995. The review of official verification records related to establishments compliance with sanitation requirements indicates that the verification results are recorded on Form GAT-019.2, Daily Control in Slaughterhouses checklist. The FSIS auditor verified that during the lamb slaughter season the lead OV conducts pre-operational slaughter verification on each slaughter day and documents the findings on the checklist referenced above. Establishments are required to correct any nonconformity found during the pre-operational sanitation verification by the OV before beginning the slaughter or boning process.

The FSIS auditor selected one of two audited slaughter establishments for review of preoperational sanitation verification activities. The FSIS auditor observed the OV conducting routine pre-operational tasks, including review of the establishment's daily sanitation record prior to commencing the verification task. During the FSIS auditor's observation, the establishment immediately corrected nonconformities identified either by the OV or by the FSIS auditor during the pre-operational verification task. The OV documented the outcome of the verification task on the government checklist. The FSIS auditor determined that government inspection personnel follow the instructions per Inspection Manual for Daily Work Activities in Slaughterhouses and in the Control Manual for Health in Slaughterhouses and Meat Packing Plants.

The FSIS auditor verified MAST's implementation of requirements for certified establishments' construction, facilities, and equipment, which are consistent with provisions of Regulation (EC) Nos. 852/2004 and 853/2004. MAST has developed procedures in Inspection Manual for Daily Work Activities in Slaughterhouses and in the Control Manual for Health in Slaughterhouses and Meat Packing Plants for government inspection personnel to verify whether conditions in certified establishments are sufficient to prevent product contamination or adulteration. These procedures encompass verification activities related to a pest management program; construction; separation of edible materials from inedible materials; employee hygiene; sanitation of equipment and utensils; adequate lighting, drainage, and ventilation; and water potability. The lead OV in the certified establishments routinely verify SPS-related requirements with a frequency that is adequate to cover all aspects of SPS requirements during the slaughter season. All verification results are documented in the government-issued checklist. Nonconformities are documented by issuing a noncompliance record which is monitored by the OV until nonconformities are resolved. The joint supervisory reviews are conducted by the DVOs or their representatives in conjunction with the FCT. The reviews consist of an in-depth review of documents combined with a site visit to determine the establishment's compliance with sanitation requirements. The FSIS auditor's tour of outside premises of the certified establishments indicated that establishments were meeting MAST's requirements.

FSIS onsite audit verification activities indicate that MAST requires establishments certified to export to the United States to develop, implement, and maintain sanitation programs to ensure that the establishment's construction, facilities, and equipment prevent the contamination or adulteration of lamb and mutton products destined for export to the United States. However, isolated findings noted in one of the audited establishments regarding sanitation are captured in the individual establishment checklist provided in Appendix A of this report.

VII. COMPONENT FOUR: GOVERNMENT HAZARD ANALYSIS AND CRITICAL CONTROL POINT (HACCP) SYSTEM

The fourth equivalence component the FSIS auditor reviewed was Government HACCP System. The food safety inspection system is to require that each official establishment develop, implement, and maintain a HACCP system.

Regulations (EC) Nos. 852/2004 and 853/2004 and Icelandic Regulations No. 103/2010 and No. 105/2010 require establishments certified to export to the United States to develop, implement, and maintain a HACCP plan consistent with FSIS requirements described in 9 CFR part 417. MAST requires certified establishments to develop and implement a critical control point (CCP) for controlling fecal matter, ingesta, and milk (i.e., zero tolerance) during lamb slaughter, to prevent visible fecal contamination and ensure food safety hazards are controlled effectively. These requirements are based on the provisions listed in Annex III of Regulation (EC) No. 853/2004. MAST's Inspection Manual for Daily Work Activities in Slaughterhouses and Control

Manual for Health in Slaughterhouses and Meat Packing Plants requires that the OV conduct daily verification activities of the HACCP plan. These verification activities include direct observation of the implementation of monitoring and recordkeeping procedures by the establishment to assess the adequacy of implementation of the HACCP system.

The FSIS auditor's review of establishments' HACCP systems included the product description sheet, flow diagram, hazard analysis, HACCP plan, and corrective action records. The documents reviewed indicated that the certified Icelandic establishments conducted a hazard analysis and considered all known chemical, biological, and physical hazards associated with their processes and addressed any identified hazard that was determined to be likely to occur with a CCP. The audited lamb slaughter establishments addressed the hazard of contamination of carcasses and parts thereof with fecal matter, ingesta, and milk with a CCP and established zero tolerance for these contaminants. The FSIS auditor noted that each establishment had a supportable monitoring frequency that would vary with the volume of slaughter and could be as many as four times a day during a full eight-hour slaughter shift. The reviewed establishments' records indicated HACCP monitoring and verification procedures and frequencies followed the HACCP plan.

The OV in each certified establishment uses the Daily Inspection Verification Schedule form as a guide for which specific HACCP verification tasks are to be carried out each day. MAST's Manual for Daily Work Activities in Slaughterhouses and Control Manual for Health in Slaughterhouses and Meat Packing Plants requires OVs to conduct daily verification activities associated with the establishments' HACCP systems. These verification activities include direct observation of the implementation of monitoring and recordkeeping procedures by the establishments. The OVs in the establishments assess the adequacy of implementation of HACCP as prescribed in the establishments' HACCP plans and in accordance with MAST's requirements. The FSIS auditor's review of checklists indicates that OVs perform a zero tolerance verification task three to four times a day by inspecting five carcasses at a point after the final rail inspection and prior to carcass entering into the cooler. OVs document daily inspection verification activity results, including findings and verification of actions taken, on Form GAT-019.2, Daily Control in Slaughterhouses.

Monthly supervisory reviews by the DVO and FCT include evaluation of the adequacy of the certified establishments' HACCP plan in ensuring food safety through compliance with FSIS import requirements and with national and EU regulations. Additionally, the monthly supervisory reviews include assessment of the OV's performance of HACCP verification activities. The FSIS auditor's review of recent supervisory reports at certified establishments indicated that the DVO has conducted HACCP reviews in accordance with MAST's requirements.

The FSIS onsite verification activities indicate that MAST requires establishments to develop, implement, and maintain a HACCP system for their slaughter and processing operation that is consistent with the criteria for this component. However, the FSIS auditor identified an isolated establishment noncompliance related to corrective action requirements. Additional details about this isolated finding are provided in the individual establishment checklist contained in Appendix A of this report.

VIII. COMPONENT FIVE: GOVERNMENT CHEMICAL RESIDUE TESTING PROGRAMS

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

MAST draws its legal authority to regulate and implement the National Risk-based Control Plan (NRCP) to prevent and control the presence of residues of veterinary drugs and chemical contaminants in livestock including in raw lamb and mutton products intended for export to the United States in accordance with the provisions in Act No. 93/1995. Icelandic Regulation No. 30/2012 describes requirements concerning residue control in animal products and aims to ensure adequate monitoring of the substances and groups of residues in animal products. Iceland's NRCP is issued annually by MAST pursuant to specific provisions related to monitoring of chemical residues found in Regulation (EU) 2017/625, Commission Implementing Regulation (EU) 2022/1646, and Regulation (EC) No. 178/2002. During an interview with the FSIS auditor, MAST officials indicated that Iceland intends to implement requirements described in Commission Delegated Regulation (EU) 2022/931 and Commission Implementing Regulation (EU) 2022/932, by early 2024. These regulations lay out the criteria for development and implementation of a multi-annual national control plan for monitoring food contaminants and replace the repealed Council Directive 96/23/EC.

The NRCP is managed and administered by the CVO and senior officers in the animal health and welfare office. The classes of chemical residues targeted for testing include banned and controlled veterinary drugs, pesticides, and heavy metals and other environmental contaminants. In addition, the NRCP lists the official laboratory and methods to be used for analysis of samples collected for chemical residue testing as well as the target tissue collected for analysis.

MAST has procedures in place to trace back a confirmed violative sample to determine if this was due to an illegal administration of the detected compound. These procedures include information collection, tracing the animal back to the farm of origin, investigating the farm history for use of illegal treatments or prior misuse of veterinary drugs, and if they are repeat violators. Field staff of MAST monitor the investigation until the case is satisfactorily closed. MAST does not allow the slaughter of livestock originating from farms or processing centers implicated in repeat violations and increases the number of samples taken for a 6-month period. During this time, product is held and will not be certified for export to the United States until acceptable sample results are received. If the violative results are found, the product is declared unfit for human consumption per procedures described in Articles 11 through 13 of Icelandic Regulation No. 30/2012.

The FSIS auditor reviewed documents, including certificates of analysis and residue sampling result records, to confirm that the type and size of samples, sampling method, method of analysis, and location of sample collection of the targeted compounds were consistent with the

information included in MAST's procedures. The FSIS auditor confirmed through records review that both audited slaughter establishments are included in the sampling program and receive sampling requests per NRCP samples distribution. The official monitoring is conducted according to the NRCP, which is reviewed and modified each year based on the results from the previous year's NRCP. The plan lists the residue group, the number of samples for the group, and the matrix for each month. The OVs are responsible for the collection of samples at slaughterhouses. The OVs responsible for collecting residue samples at the lamb slaughter establishments have received sufficient training, including such subjects as sampling methodology, identification of animals, traceability, and sample security.

The FSIS onsite audit activities indicate that MAST continues to maintain the legal authority to regulate, plan, and execute activities of the inspection system that are aimed at preventing and controlling the presence of residues of veterinary drugs and chemical contaminants in raw lamb and mutton products intended for export to the United States.

IX. COMPONENT SIX: GOVERNMENT MICROBIOLOGICAL TESTING PROGRAMS

The last equivalence component the FSIS auditor reviewed was Government Microbiological Testing Programs. The food safety inspection system is to implement certain sampling and testing programs to ensure that meat prepared for export to the United States are safe and wholesome.

MAST implements requirements in Icelandic Regulation No. 650/2001 for establishments to monitor process control during lamb and sheep slaughter and carcass dressing. MAST requires the use of generic Escherichia (E.) coli as an indicator organism to verify that slaughter and dressing processes are sufficient to prevent fecal contamination. The indicator organism sampling requirement is an establishment responsibility, not part of an official government sampling program. Additionally, Article 15 of Icelandic Regulation No. 650/2001, requires certified establishments to take corrective actions if permissible levels for indicator organisms testing are exceeded. The OV and DVO then conduct follow-up verification of corrective actions implemented. Iceland's requirements are consistent with FSIS regulatory requirements described in 9 CFR 310.25(a) for generic E. coli carcass testing for lamb and sheep. The FSIS auditor verified that MAST requires all sheep and lamb slaughter establishments certified to export product to the United States to collect and analyze carcass samples for indicator organisms in accordance with Icelandic Regulation No. 650/2001. The FSIS auditor also reviewed records related to microbiological testing at the audited lamb slaughter establishments and verified that establishments are collecting samples at the required frequencies and following MAST's requirements for sample collection and analysis. No issues were identified by the FSIS auditor.

The FSIS auditor verified that OVs conduct daily verification activities of the establishments' generic *E. coli* testing programs in chilled lamb carcasses and record the results on the Daily Control in Slaughterhouses checklist. The inspection activities include verifying that each establishment uses appropriate sampling methodology and technique; the frequency of sampling is appropriate; and that establishments take appropriate corrective actions when upper control limits are exceeded. During the monthly supervisory reviews DVOs verify that slaughter

establishments comply with MAST's regulatory requirements regarding generic *E. coli* testing of lamb carcasses and record results on the Veterinary Checklist Daily-Weekly-Monthly-Yearly. The FSIS auditor's review of inspection records identified no concerns.

In addition to the requirements for testing of carcasses for generic *E. coli*, MAST implements requirements for testing for coliforms and total plate count using criteria laid out in Commission Regulation (EC) No. 2073/2005.

The FSIS auditor concluded that MAST's inspection system continues to implement the necessary microbiological sampling and testing programs consistent with the equivalence criteria for this component.

X. CONCLUSIONS AND NEXT STEPS

A remote exit meeting was held on September 25, 2023, with MAST officials. At this meeting, the FSIS auditor presented the preliminary finding from the audit. An analysis of the finding noted below did not identify any deficiencies that represented an immediate threat to public health.

GOVERNMENT OVERSIGHT (e.g., ORGANIZATION and ADMINISTRATION)

• MAST, as the CCA has a provision that allows retesting of samples with violative results from chemical residue testing. MAST does not ensure that violative samples that are retested are not certified for export to the United States.

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

APPENDICES

Appendix A: Individual Foreign Establishment Audit Checklists

United States Department of Agriculture Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION 2. AUDIT Slaturhus KVH 09/19 530 Hvammstangi 09/19			3. ESTABLISHMENT NO.	4. NAME OF COUNTRY	
		023	A022	Iceland	
				6. TYPE OF AUDIT	
	OIEA In	ternationa	al Audit Staff (IAS)		דוחוום דו
Place on V in the Audit Peoulte black to in	dioato nor	nomel	ionoo with roquirem		
Place an X in the Audit Results block to in Part A - Sanitation Standard Operating Procedures		· ·		art D - Continued	
Basic Requirements	(3307)	Audit Results		onomic 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	')			- Other Requirements	
Ongoing Requirements				- 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 of product contamination or adulteration.	direct		38. Establishment Grounds	and Pest Control	
13. Daily records document item 10, 11 and 12 above.			39. Establishment Construct	ction/Maintenance	X
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements			40. Light		
14. Developed and implemented a written HACCP plan .			41. Ventilation		
 Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective a 	actions.		42. Plumbing and Sewage		
 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/Lavato		x
Hazard Analysis and Critical Control Point				5	
(HACCP) Systems - Ongoing Requirements			46. Sanitary Operations		X
18. Monitoring of HACCP plan.			47. Employee Hygiene		
19. Verification and validation of HACCP plan.			48. Condemned Product Co	ontrol	
20. Corrective action written in HACCP plan.			Dout E	nonaction Boguiromanto	
21. Reassessed adequacy of the HACCP plan.			Part F - I	nspection Requirements	
 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 Covera	age	
23. Labeling - Product Standards			51. Periodic Supervisory Revie	ews	
24. Labeling - Net Weights			52. Humane Handling		x
25. General Labeling					<u>л</u>
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/M	loisture)		53. Animal Identification		
Part D - Sampling Generic <i>E. coli</i> Testing			54. Ante Mortem Inspection	1	
27. Written Procedures			55. Post Mortem Inspection	1	
28. Sample Collection/Analysis			· · · · · · · · · · · · · · · · · · ·		
29. Records			Part G - Other Regu	ulatory Oversight Requirements	
Salmonella Performance Standards - Basic Requ	uirements		56. European Community D	irectives	0
30. Corrective Actions			57.		
31. Reassessment			58.		
32. Written Assurance			59.		

FSIS- 5000-6 (04/04/2002)

Establishment Operations:	Lamb slaughter and processing.
Prepared Products:	Raw intact meat – lamb and mutton

60. Observation of the Establishment

39. The shutter door of the storage room, designated to store shipping boxes and other dry goods, was poorly maintained. The detailed findings are as follows: loosely attached door sealing gaskets hanging at multiple places on both sides of the door; rust and dirt collecting on the door springs as well as other overhead hardware of the roller door; dirt and moisture collecting on the floor around both sides of the door; and packaging material stored tightly against walls. The OV requested management to correct the insanitary conditions observed in the as soon as possible.

45. Establishment were using same-colored baskets to store both edible and inedible product (category 2 product usually directed to pet food production). This practice is likely to result in routing of inedible product as edible products. The lead OV in the establishment required immediate corrective action from the establishment.

46. Over the product condensation was observed in two chillers, on the overhead moving rail carrying product from the chiller to the cutting room, and the offal harvesting room. No direct product contamination was observed in the chiller or on the moving overhead rail, however, dripping condensate onto the offal was observed in the offal harvesting room. The establishment took immediate corrective action including product segregation for further evaluation and proper disposition of the product.

52. While verifying the humane slaughter and animal welfare control measures applied by the establishment, the FSIS auditor noted that solid plastic cylindrical rollers measuring approximately 2" in diameter with a metallic center were used as support for the lairage gate to keep the gate in an open position and resting on rollers as support. When the gate is in closed position, the rollers protrude 4-6 inches into the pen and may pose injury to the animals. The OV requested the issue to be resolved as soon as possible.

61. AUDIT STAFF	62. DATE OF ESTABLISHMENT AUDIT
OIEA International Audit Staff (IAS)	09/19/2023

United States Department of Agriculture Food Safety and Inspection Service

Foreign Establishment Audit Checklist

	N	2. AUDIT DATE				
1. ESTABLISHMENT NAME AND LOCATION 2. AUDIT E Slaturfelag Sudurlands 09/20/2 Selfoss 09/20/2				3. ESTABLISHMENT NO.	4. NAME OF COUNTRY	
		09/20/2	023	A081	Iceland	
				6. TYPE OF AUDIT		
		OIEA In	ternationa	l Audit Staff (IAS)	X ON-SITE AUDIT DOCUMEN	
Place an X in the Audit Result	a block to ind	icato nor	oomnl	ionco with roquirom		
Part A - Sanitation Standard Operatin			· ·		art D - Continued	1
Basic Require	-	550P)	Audit Results		onomic 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 ov	erall authority.			35. Residue		
Sanitation Standard Operating Pro	cedures (SSOP)				- Other Requirements	
Ongoing Requiremen	its				- Other Requirements	
10. Implementation of SSOP's, including mo	• •	ntation.		36. Export		
11. Maintenance and evaluation of the effec				37. Import		
12. Corrective action when the SSOP's have product contamination or adulteration.	e failed to prevent dir	rect		38. Establishment Grounds	and Pest Control	
13. Daily records document item 10, 11 and	12 above.			39. Establishment Construe	ction/Maintenance	
Part B - Hazard Analysis and Cri	itical Control			40. Light		
Point (HACCP) Systems - Basic I 14. Developed and implemented a written H	-			41. Ventilation		
 Contents of the HACCP list the food safe critical control points, critical limits, proce 	ety hazards,	tions.		42. Plumbing and Sewage		
 Records documenting implementation a HACCP plan. 			X	43. Water Supply		
17. The HACCP plan is signed and dated by	y the responsible			44. Dressing Rooms/Lavate	ories	
establishment individual.				45. Equipment and Utensil	S	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements				46. Sanitary Operations		
18. Monitoring of HACCP plan.	•			47. Employee Hygiene		
19. Verification and validation of HACCP pla	an.			48. Condemned Product C	ontrol	
20. Corrective action written in HACCP plan	n.					
21. Reassessed adequacy of the HACCP plan.			Part F - I	nspection Requirements		
22. Records documenting: the written HACC critical control points, dates and times of				49. Government Staffing		
Part C - Economic / Whole	esomeness			50. Daily Inspection Cover	age	
23. Labeling - Product Standards				51. Periodic Supervisory Revi	owe	-
24. Labeling - Net Weights					6465	
25. General Labeling			52. Humane Handling			
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)			53. Animal Identification			
Part D - Sampling Generic <i>E. coli</i> Testing				54. Ante Mortem Inspection	n	
27. Written Procedures			55. Post Mortem Inspection	n		
28. Sample Collection/Analysis						
29. Records				Part G - Other Reg	ulatory Oversight Requirements	
Salmonella Performance Standards - Basic Requirements				56. European Community D	Directives	0
30. Corrective Actions				57.		
31. Reassessment				58.		
32. Written Assurance				59.		

FSIS- 5000-6 (04/04/2002)

Establishment Operations:	Lamb slaughter and processing.
Prepared Products:	Raw intact meat – lamb and mutton
Flepaled Floducts.	Kaw inact meat – taino and mution

60. Observation of the Establishment

16. At multiple instances, the establishment did not complete its specified corrective actions procedure when a zero-tolerance deviation occurred. The procedure requires that when a zero-tolerance failure occurs, among other steps, the establishment must also issue an in-house noncompliance report to capture critical information on the corrective action. The establishment failed to issue noncompliance reports as it maintained that two or three carcasses out of the twenty carcasses monitored for CCP with zero-tolerance failure did not warrant a noncompliance report. The OV requested corrective action from the establishment.

61. AUDIT STAFF	62. DATE OF ESTABLISHMENT AUDIT
OIEA International Audit Staff (IAS)	09/20/2023

Appendix B: Foreign Country Response to the Draft Final Audit Report

From: Freydís Dana Sigurðardóttir - MAST	
Sent: Friday, April 5, 2024 5:43:18 PM	
To: Flach, Bob R (The Hague)	
Cc: Þorvaldur H Þórðarson - MAST	; Ágústa R Jónsdóttir - MAST
; Hrönn Ólína Jörund	sdóttir - MAST ; Geller,

Laura (The Hague)

Subject: FSIS - Draft Final Report of an Audit Conducted / Iceland

Dear Mr. Bob Flach

Sorry for the late reply. Upon, the equivalence verification audit of Iceland conducted by the USDA Food Safety and Inspection Service (FSIS) September 18–25, 2023, Matvælastofnun has been in contact with the laboratory Matís and has requested specifically that samples that are over allowed maximal limits shall not be retested. This applys for all relevant samples of meat from sheep and requested in writing by the Senior Veterinary Officer of Residues and Welfare of Slaughter Animals in Matvælastofnun.

The changed procedure can first be verified during next lamb-slaughter-season.

Með kveðju/ Best regards Freydís Dana Sigurðardóttir Sérgreinadýralæknir sláturhúsa og sviðsstjóri/ senior veterinary officer of slaughterhouses and director of office Samhæfing/Coordination



Matvælastofnun / Icelandic Food and Veterinary Authority Furuvellir 1 – 600 Akureyri – Iceland Sími/tel: (+354) 530 4800 – <u>www.mast.is</u> – <u>Fyrirvari/Disclaimer</u>