United States Department of Agriculture

Food Safety and
Inspection Service

1400 Independence
Avenue, SW.
Washington, D.C.
20250

February 28, 2023

Christine Middlemiss
Chief Veterinary Officer
Department for Environment, Food and Rural Affairs (DEFRA)
Area 5 B, Nobel House
17 Smith Square
London SWIP 3JR, Great Britain

Dear Ms. Middlemiss,

The United States Department of Agriculture Food Safety and Inspection Service (FSIS) conducted a remote ongoing verification audit of the United Kingdom's inspection system from May 10 through June 24, 2022. We appreciate the response you provided to FSIS on December 7, 2022, concerning the draft final audit report. FSIS is still evaluating your response, including the preliminary corrective actions, to determine whether the United Kingdom is maintaining a meat inspection system equivalent to that of the United States. Enclosed is a copy of the final audit report. The comments received from the Government of the United Kingdom are included as an attachment to the report.

Sincerely,

MARGARET BURNS RATH

Digitally signed by MARGARET BURNS RATH
Date: 2023.02.28 15:03:40 -05'00'

On behalf of:
Michelle Catlin, PhD
International Coordination Executive
Office of International Coordination

Enclosure

FINAL REPORT OF A REMOTE AUDIT CONDUCTED OF THE UNITED KINGDOM

MAY 10–JUNE 24, 2022

EVALUATING THE FOOD SAFETY SYSTEM GOVERNING MEAT PRODUCTS EXPORTED TO THE UNITED STATES OF AMERICA

February 15, 2023

Food Safety and Inspection Service
United States Department of Agriculture

Executive Summary

This report describes the outcome of a verification audit of the United Kingdom conducted by the United States Department of Agriculture's (USDA), Food Safety and Inspection Service (FSIS) May 10–June 24, 2022. Due to the global COVID-19 pandemic the audit was conducted remotely using video conferences to conduct interviews and records review. The purpose of the audit was to verify whether the United Kingdom's food safety inspection system governing meat products remains equivalent to that of the United States, with the ability to export products that are safe, wholesome, unadulterated, and correctly labeled and packaged. The United Kingdom currently exports the following categories of beef and pork products to the United States: raw-intact and raw-non intact.

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 findings within each component did not identify any deficiencies that represented an immediate threat to public health. The FSIS auditors identified the following finding:

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

- The Department of Environment Food and Rural Affairs (DEFRA), the Central Competent Authority (CCA) in the United Kingdom, does not ensure that final dispositions for carcasses with systemic disease conditions are performed by a veterinarian during post-mortem inspection.

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

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I. INTRODUCTION

The Food Safety and Inspection Service (FSIS) of the United States Department of Agriculture (USDA) conducted a remote audit of the United Kingdom's food safety system May 10–June 24, 2022. The audit began with an entrance meeting held via videoconference on May 10, 2022, with representatives from the Central Competent Authority (CCA)–Department of Environment Food and Rural Affairs (DEFRA). Representatives from DEFRA participated throughout the entire audit.

II. AUDIT OBJECTIVE, SCOPE, AND METHODOLOGY

This was a routine ongoing equivalence verification audit that was conducted remotely. The audit objective was to determine whether the food safety inspection system governing meat products remains equivalent to that of the United States, with the ability to export products that are safe, wholesome, unadulterated, and correctly labeled and packaged. The United Kingdom 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, or Otherwise Non-intact Beef	Beef - All Products Eligible except Advanced Meat Recovery Product (AMR); Beef Patty Product; Finely Textured Beef; Ground Beef; Hamburger; Low Temperature Rendered Product (LTRP); Partially Defatted Beef Fatty Tissue (PDBFT); Partially Defatted Chopped Beef (PDCB).
Raw - Non Intact	Raw Ground, Comminuted, or Otherwise Non-Intact Meat-Other (Sheep, Goat)	Lamb and Mutton - All Products Eligible except Mechanically Separated and AMR.
Raw - Non Intact	Raw Ground, Comminuted, or Otherwise Non-intact Pork	Pork - All Products Eligible except Mechanically Separated and AMR.
Raw - Intact	Raw Intact Beef	Beef - All Products Eligible except Cheek Meat; Head Meat; Heart Meat; and Weasand Meat.
Raw - Intact	Raw Intact Meat-Other (Sheep, Goat)	Lamb and Mutton – All Products Eligible
Raw - Intact	Raw Intact Pork	Pork - All Products Eligible

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

The USDA's Animal and Plant Health Inspection Service (APHIS) recognizes England, Scotland, and Wales as subject to foot-and-mouth disease (FMD) requirements specified in Title 9 of the United States Code of Federal Regulations (9 CFR) 94.11, and bovine spongiform encephalopathy (BSE) requirements specified in 9 CFR 94.18 and/or 9 CFR 94.20 for beef exported to the United States. For Northern Ireland, beef exported to the United States is subject to FMD requirements as specified in 9 CFR 94.11, and BSE requirements as specified in 9 CFR 94.18 and/or 9 CFR 94.19. Pork exported from the United Kingdom is subject to African swine fever requirements specified in 9 CFR 94.8, classical swine fever requirements specified in 9 CFR 94.31, swine vesicular disease requirements specified in 9 CFR 94.13, and FMD requirements specified in 9 CFR 94.11. Lamb and mutton exported from the United Kingdom is subject to FMD requirements specified in 9 CFR 94.11.

Prior to the remote equivalence verification audit, FSIS reviewed and analyzed the United Kingdom's Self-Reporting Tool (SRT) responses and supporting documentation, including official chemical residue and microbiological sampling plans and results. During the audit, the FSIS auditors conducted interviews and reviewed records to determine whether the United Kingdom's food safety inspection system governing meat 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 reinspection and testing results, specific oversight activities of government offices, and testing capacities of laboratories. The review process included an analysis of data collected by FSIS over a 3-year period, in addition to information obtained directly from DEFRA 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 auditors reviewed records related to administrative functions and oversight at DEFRA headquarters, as well as government verification records from three regional offices, and three local inspection offices within the establishments. The remote audit involved meetings with government personnel and laboratory staff. The 7-week audit consisted of up to two meetings each week except for the third week where three sessions were held. Through records review, the FSIS auditors evaluated the implementation of control systems that ensure the national system of inspection, verification, and enforcement is being implemented as documented in the country's SRT responses and supporting documentation.

A sample of 3 establishments was selected for the remote audit from a total of 20 establishments certified to export to the United States. This included one beef, one sheep, and one pork slaughter and processing establishment. The products beef and pork establishments produce and

export to the United States include raw-intact beef products and raw intact and raw non-intact pork products respectively. As part of reinstatement of eligibility to export products derived from sheep and small ruminants, FSIS also included a sheep slaughter and processing (boning) establishment in the audit to evaluate inspection system controls related to this species.

This remote audit focused on a review of records associated with official government verification activities conducted at the selected establishments. It did not include review of establishments' conditions or records. The FSIS auditors assessed DEFRA's ability to provide oversight through supervisory reviews conducted in accordance with FSIS equivalence requirements for foreign food safety inspection systems outlined in 9 CFR 327.2.

The FSIS auditors also remotely audited two government laboratories (one conducting both microbiological and chemical residue testing, the other conducting solely chemical residue testing) to verify that these laboratories are capable of providing adequate technical support to the food safety inspection system.

Remote Audit Scope		**#**	**Locations**
Competent Authority	Central	1	• DEFRA, London
	Regional	3	• Northern Ireland Regional Authority, Ballykelly • Food Standards Agency (FSA), York • Food Standards Scotland (FSS), Aberdeen
Laboratories		2	• Agri-Food and Bioscience Institute (AFBI), Belfast (official microbiology and chemical residue laboratory) • Food and Environment Research Agency (FERA Science Ltd), York (official chemical residue laboratory)
Beef slaughter and raw processing		1	• Establishment No. 9016, Foyle Food Group Campsie, Campsie
Lamb and mutton slaughter and raw processing		1	• Establishment No. 7135, Randall Parker Foods Ltd, Llanidloes
Pork slaughter and raw processing		1	• Establishment No. 2060, Karro Food Ltd, North Yorkshire

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 1901-1906); and
- The Meat Inspection Regulations (9 CFR Parts 301 to the end).

The audit standards applied during the review of United Kingdom's inspection system for meat 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 January 1, 2019 to December 31, 2021, FSIS import inspectors performed 100 percent reinspection for labeling and certification on 3,392,954 pounds of beef and 55,071,384 pounds of pork products exported by the United Kingdom to the United States. Of these amounts, additional types of inspection were performed on 393,057 pounds of beef products and 5,209,731 pounds of pork products. These additional types of inspection included physical examination, chemical residue analysis, and testing for microbiological pathogens (Shiga toxin-producing *Escherichia (E)coli* (STEC) including serogroups O157, O26, O45, O103, O111, O121, and O145). As a result of this additional testing, 306 pounds of pork products were refused entry due to localized pathological conditions, and 53,839 pounds of raw intact bone-in pork loin ribs were refused entry due to a public health concern involving the detection of visible fecal contamination on the product. DEFRA proffered corrective actions which were reviewed and accepted by FSIS.

The previous FSIS audit in 2019 did not identify any deficiencies that represented a threat to public health. The most recent FSIS final audit reports for the United Kingdom's food safety inspection system are available on the FSIS website at: www.fsis.usda.gov/foreign-audit-reports.

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

The first equivalence component the FSIS auditors 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.

Although the United Kingdom is no longer a member of the European Union (EU), it retains and implements the requirements of the European Commission (EC) food hygiene regulations, which are the primary overarching laws for regulating meat inspection in the EU. The United Kingdom draws its authority to enforce inspection laws from Regulation (EC) No. 178/2002, which establishes the general principles and requirements of food law and defines the European Food Safety Authority and procedures in matters of food safety.

Food safety in the United Kingdom consists of distinctly shared functions between DEFRA, which is the CCA responsible mainly for animal health and welfare, chemical residues surveillance, and international trade; and individual competent authorities that are responsible for official inspection activities within each of the four countries which make up the United Kingdom (England, Wales, Scotland, and Northern Ireland). DEFRA, a central ministerial government department in the United Kingdom is the CCA and, as stated above, oversees

matters related to food safety, animal health, and international trade for foods including food products derived from livestock and poultry. DEFRA is also responsible for: policy development; certification of foods including foods of animal origin for export to the United States; ensuring compliance with the country-specific requirements for importing countries; animal welfare; and, through its veterinary medicine directorate (VMD), the management and administration of veterinary residue surveillance schemes and coordination through planned meetings with meat inspection authorities in England, Wales, Scotland, and Northern Ireland. The department is supported by the following four directorates: Policy; Regulations and delivery on environmental matters; Food; and Rural issues. The director generals for each directorate, along with the Minister, make up the DEFRA board that interacts with DEFRA's other executive agencies, including the Animal and Plant Health Agency (APHA); the VMD; the Centre for Environment, Fisheries and Aquaculture Science; and the Rural Payments Agency.

The authority to enforce laws and regulations to ensure safety of food, including meat inspection, occurs as a result of the enactment of devolved acts implemented in England, Wales, Scotland, and Northern Ireland. The United Kingdom's parliament passed three devolved acts known as: the Government of Wales Act of 1998, the Scotland Act of 1998, and the Northern Ireland Act of 1998. These acts established the three devolved legislatures, which delegated some powers previously held by the United Kingdom parliament (Westminster). Further powers have been devolved since these original acts, most recently through the Scotland Act of 2016 and the Wales Act of 2017. Devolved matters are those areas of government where decision-making has been delegated by parliament to the devolved institutions such as the Scottish parliament; the Assemblies of Wales, Northern Ireland, and England; or to local authorities in the United Kingdom. In this context each of the four countries in the United Kingdom establish competent authorities (CA) for official controls and inspection in food business and meat establishments. These CAs include the Food Standard Agency (FSA) in England and Wales, the Food Standards Scotland (FSS) in Scotland, and the Department for Agriculture, Environment and Rural Affairs (DAERA) on behalf of FSA in Northern Ireland under the terms of a service level agreement. FSA, a non-ministerial government department of the United Kingdom, is a public health regulatory agency with jurisdiction in England and Wales that was established by the Food Standards Act 1999. DAERA assigns the Veterinary Public Health Program, which is responsible for inspection activities in meat inspection establishments in Northern Ireland. FSS is also a non-ministerial government public health agency which was established under the Food (Scotland) Act 2015.

In the United Kingdom, FSA and FSS delegate the authority to enforce Food Law to local authorities (LA) under the Food Standards Act 1999. This authority is implemented through the Food Law Codes of Practice for England, Scotland, Wales, and Northern Ireland. The FSA and FSS provide directions to LAs to implement food hygiene policy in stand-alone boning and processing establishments producing certain meat products as well as in cold storage (CS) establishments that are certified for export to the United States. FSA and FSS provide oversight through audits of CS establishments. The auditor reviewed an example of the audit conducted at a CS establishment and did not identify any concerns.

FSA, FSS and DAERA have implemented their respective Manuals of Official Controls (MOC) which are principally the same in objectives, procedures, and enforcement. The official

veterinarians (OV) and official auxiliaries (OA) follow procedures when verifying establishments' compliance with EU Regulations. Based on the MOC procedures, each country in the United Kingdom has developed templates for operational reports, audit reports, checklists, daybook entries, and enforcement notices that must be completed by the OVs or their designees as instructed in the MOCs. In addition to compliance with the overarching EU requirements through MOC procedures, FSIS-specific documentation and records have been developed as specified in the document titled Central Competent Authority Verification Procedures in USDA Approved establishments Pork, Beef, and Lamb, to verify compliance with the special conditions that establishments certified as eligible to export to the United States must meet. The document mentioned above specifies regulatory requirements, verification methodology, and enforcement techniques to ensure compliance with FSIS requirements that are prerequisites for the establishments to maintain eligibility for export to the United States. FSIS requirements are also mandated through DEFRA's Required Methods of Operation (RMOP) document. Verification of compliance with the requirements of RMOP ensures that FSIS-specific requirements are carried out and recorded on a series of daily and weekly checklists utilized by the OVs across the United Kingdom with little or no change to the format. For instance, Forms 10 and 11, which require daily and weekly verification of the establishment's controls, are used uniformly throughout the inspection system in the United Kingdom. There have not been any recent changes to DEFRA's structure for oversight of the food safety inspection system of meat products.

DEFRA maintains a statutory definition of adulterated product consistent with Regulation (EC) 1069/2009 and Commission Regulation (EU) 142/2011 for adulterated meat which includes provisions for economic adulteration and food fraud. The FSIS auditors, through interviews and document review with DEFRA, FSA, and DAERA officials evaluated the process of export health certificate (EHC) issuance and certification for product intended for export to the United States. DEFRA, upon an agreement with USDA-APHIS on April 1, 2022, amended 1631- EHC Export of Fresh Meat and Meat By-Products to the United States to include sheep and lamb requirements. These changes were also reflected in the guidance document Notes for the Guidance (NFG) used by OVs and exporters. Export Health Certificates Online (EHCO) in Scotland, Wales, and England, and the DAERA Export Certification On Line (DECOL) in Northern Ireland are web-based services for the application, certification and issuing of export certificates to non-EU countries, including the United States. The services can be accessed, applications completed, and documents uploaded by exporters when the product is intended for export to the United States. The OV accesses the completed form containing a unique identifier number assigned by the system to the certificate, verifies the details and eligibility of the product on the associated NFG document for the 1631- EHC, and reviews notifiable disease clearances (NDC). The certification process for the OV's review also requires presentation of Internal Movement Certificates (IMC) or Support Health Attestations (SHA) documents signed by a registered veterinarian in the field that must also be a member of the Royal College of Veterinary Surgeons (RCVS). By requiring the IMC or SHA documents, the OV ensures that products intended for export originate from establishments in the United Kingdom certified for export to the United States or from other countries eligible to export those products to the United States. Further, these documents contain crucial information on the origin of the livestock to be slaughtered, including the farm and the date of birth. APHA in Scotland, Wales, and England and DAERA in Northern Ireland receive electronic versions of the certificates for their records. The FSIS auditors' review of records indicated that inspection personnel routinely confirm

acceptable test results of official microbiological and chemical residue sampling prior to certifying product for export to the United States. The auditor's verification of the EHC process and the associated document review did not raise any questions.

The FSIS auditors reviewed the procedures for certification of establishments eligible for export to the United States. Establishments seeking approval must be eligible for intracommunity trade in accordance with Article 4 of the retained Regulation (EC) 853/2004. The veterinary field leader from either FSA, FSS, or DAERA, depending on the jurisdiction, conducts a site visit of the establishment requesting approval for beef or pork products to the United States. The requesting establishment must develop and implement procedures for export to the United States as described in the RMOP. The export veterinary auditors (EVA) conduct monthly audits and provides recommendations to the relevant chain of command in FSA, FSS or DAERA. The relevant CA (e.g., FSA, FSS, or DAERA) communicates the certification to DEFRA, who maintains the ultimate authority to accept or reject approval and communicate the information to FSIS on new certification. The FSIS auditors reviewed the process of certification through interviews and document review, including a review of documents associated with DAERA's recent approval of an establishment for export of beef and pork products to the United States, and did not identify any concerns.

The United Kingdom maintains procedures through an individual sanitary measure that allows the deployment of trained contract employees who are not under direct government supervision, to perform inspection activities at establishments certified as eligible to export to the United States. The OVs and OAs are contracted employees or licensees paid by the government either directly or through a third-party contractor. The auditors verified that under a service level agreement, FSA has contracted a third-party provider, to appoint OVs in England and Wales. The contracted employees are required to complete a signed conflict of interest declaration form prior to their assignment. In Scotland and Northern Ireland, OVs who are responsible for conducting inspection activities in establishments eligible to export to the United States are directly hired civil servants of FSS and DAERA, respectively. Environmental health officers, who are responsible for food hygiene enforcement at establishments other than the slaughter/processing, (e.g., certified cold storage or stand-alone boning establishments) are employed or contracted and paid by local governments. The FSIS auditors verified an example of conflict of interest declaration form for an OV and OA employed by the third-party provider and did not identify any concerns.

In the United Kingdom, applicants must have a doctor of veterinary medicine or equivalent degree and be a member of RCVS. Additionally, OVs must have successfully completed both theoretical and practical probationary (on-the-job) training and must pass a final assessment prior to being assigned to carry out their duties. The OVs who are assigned to certified establishments also receive ongoing training on specific FSIS requirements. Online training modules on food safety are offered by APHA and DAERA. All practical training is performed under supervision of a resident OV in an establishment. OAs and meat hygiene inspectors (MHI) undergo National Vocational Qualification training which consists of theoretical and practical segments. Performance of OVs is assessed through regular audits by the supervisory staff and the audits conducted by area veterinary managers of the third-party contractor who also assesses performance of OVs during their internal audits and inspections in England and Wales. The OVs

routinely supervise and assess performance of OAs working under them. The FSIS auditors verified that the most recent training occurred on March 24, 2022, on the topic of Exporting Meat (Lamb and Goat) to the United States and found no concerns as a result of verification of this audit criterion.

The administrative and technical support to operate the laboratory system implemented by DEFRA is consistent with the provisions in Chapter IV of Regulations (EU) 2017/625. The structure of the laboratory system comprises two types of laboratories: the official testing laboratories that are responsible for testing food and feed samples for official controls and the national reference laboratories that provide support and advice to official laboratories on analytical methods. The laboratory system also allows third-party (private) laboratories to conduct official testing, provided that these laboratories meet established standards set forth by each CA for their respective country. The approval process requires that the analytical tests used by the laboratory are included in the scope of accreditation consistent with International Organization for Standardization/International Electrotechnical Commission (ISO) 17025 standards. Discussion with government officials on the use of private laboratories for analyses of official samples revealed that private laboratories that meet the CA's criteria for laboratories, including ISO 17025 accreditation, can be utilized for analysis of official samples. Laboratories obtain ISO 17025 accreditation through the United Kingdom Accreditation Service (UKAS). FSA and FSS have a memorandum of understanding in place with UKAS to share the outcomes of regular UKAS accreditation audits with these agencies so they can ensure that laboratories continue to meet the legal requirements over time. FSA is responsible for overseeing the food and feed testing laboratories in Scotland, Wales, and England and DAERA has oversight in Northern Ireland. The Food and Environment Research Agency Science Ltd. and the Agri-Food Biosciences Institute (AFBI) laboratories are responsible for analysis of official samples under the National Residue Surveillance Scheme (NRSS) in the United Kingdom. AFBI is also responsible for conducting analytical testing for STEC for official samples collected from beef products intended for export to the United States. The FSIS auditors reviewed the most recent UKAS accreditation audit scope and the accreditation certificate for both laboratories. FSIS auditors also verified implementation of AFBI's analysis method for detection of STEC in beef products intended for export to the United States and did not identify any concerns.

To assess the competence, skills, knowledge, and ongoing training of analysts assigned to the microbiological and the chemical laboratories, the FSIS auditor reviewed the most recent proficiency reports for each of the laboratories. The review of the proficiency testing program indicated that both laboratories participated in Food Analysis Performance Assessment Scheme testing program for up to 50 participations each year. The laboratories also participate in a proficiency testing program with a second provider at least four times a year. The laboratories also conduct internal audits, ensuring that each method is audited at least once every 4 years. The FSIS auditors reviewed the scope and audit reports of the most recent internal audits for both laboratories and confirmed that laboratories met the standards identified in the scope, except for minor findings which were addressed and accepted by the laboratory internal auditors. The auditors additionally reviewed examples of analyst worksheets, training records and relevant academic credentials and experience as analysts in their specialty areas. The auditor's review of proficiency testing, and quality assurance procedures did not raise any concerns.

Laboratory officials present at the audit shared analysts' worksheets and completed forms and demonstrated how data is maintained digitally using the laboratory information management system (LIMS). LIMS utilizes template Forms A, B, and a certificate of analysis (COA) when generating reports. Nonconformant results are reported on Form A for screen positives and Form B is used to report confirmed positives. Residue In Meat Form or RIM Forms A and B and COA are automatically sent daily to both the VMD and FSA as well as to the OV in the certified establishment.

The FSIS auditors verified that the United Kingdom's meat food safety inspection system has the organizational structure to provide ultimate control, supervision, and enforcement of regulatory requirements for this component.

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 auditors 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 animals; post-mortem 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 United Kingdom implements the requirements for humane handling specified in retained Regulation (EC) 1/2005 on the protection of animals during transport and retained Regulation (EC) 1099/2009 on the welfare of animals at the time of slaughter. Instructions for implementing and verifying these requirements are provided in the MOCs Chapter 2.3 – Animal Welfare. APHA oversees the operational delivery of animal health and welfare for England, Wales, and Scotland while this work in Northern Ireland is the responsibility of DAERA. The FSIS auditors verified through record review that the OV in certified establishments conduct humane handling and slaughter verification activities as required by DEFRA.

The FSIS auditors reviewed recent humane handling verification activities conducted by OVs. These activities are documented on worksheets and are designed to monitor the welfare of live animals and all aspects of humane slaughter including to ensure religious methods if applicable are carried out per establishment documented procedures. Enforcement actions taken by the OVs are also recorded within the databases of the CAs. Noncompliance with the retained EU regulations or relevant national laws are met with enforcement actions and are documented on a Welfare Enforcement Notice. The FSIS auditors did not identify any areas of concern regarding humane handling requirements.

The United Kingdom's requirements for ante-mortem inspection are specified in retained Regulation (EU) 2019/627 and implemented through procedures provided in the MOCs domestically. Additional requirements specific to certified establishments producing meat products eligible for export to the United States are provided in Central Competent Authority

Verification Procedures in USDA Approved Establishments Pork, Beef, and Lamb.

Livestock presented for slaughter must be accompanied by food chain information (FCI) which is verified by the OV for each batch of livestock. The OV conducting ante-mortem inspection must examine animals at rest and in motion. Cows, bulls, or any animals showing signs of diseases or distress must be observed on both sides while in motion. Steers, heifers, and veal calves may be observed in motion from one side. All non-ambulatory cattle are ineligible for use in products intended for export to the United States. Additionally, pigs showing temperatures above >41.1°C (106 °F) or cattle and sheep with temperatures >40.5°C (105 °F) are also ineligible for United States production. The FSIS auditors reviewed ante-mortem verification records for red meat and concluded the ante-mortem inspection is conducted as required by DEFRA.

Post-mortem inspection requirements are provided in retained Regulation (EU) 2019/627 and are implemented through the instructions provided in the MOC (Chapter 2.4 - Post-Mortem Inspection). Post-mortem inspection includes consideration of ante-mortem inspection results, detection of zoonotic and notifiable diseases, FCI, and examination of all external surfaces of carcasses for visible contamination or pathological lesions. Post-mortem inspection must take place immediately following slaughter and includes carcasses and accompanying offal. All carcasses and parts that will be used to produce meat products intended for export to the United States receive post-mortem inspection at head, viscera, and carcass stations with procedures consistent with FSIS post-mortem inspection procedures. Post-mortem inspection may be performed by an OV or by other government inspectors (OAs or MHIs)) under direct supervision of an OV. The post-mortem inspection results are recorded daily in the relevant electronic databases (e.g., InterSystem IRIS (intuitive, reliable, interoperable, and scalable) in England, Wales, and Scotland; and in the Animal Public Health Information System in Northern Ireland).

Through records review and interviews conducted with supervisory personnel, FSIS auditors determined that in the United Kingdom, OVs are only required to make final disposition on carcasses and parts of animals that have conditions that are considered uncommon (e.g., possible human or animal health implications (zoonotic and notifiable diseases), possible animal welfare problem, referrals for veterinarian differential diagnosis). OAs or MHIs, who may not be veterinarians, are allowed to make final disposition on carcasses of animals with disease conditions that are classified as common without retaining the carcasses for OV review of the disposition. A list of examples of common and uncommon conditions is provided in the MOC, Chapter 2.4. There are also post-mortem condition cards that contain detailed information, including decision-making guidelines, about the common conditions found in cattle, sheep, and pigs during post-mortem inspection. The United Kingdom classifies several common disease conditions that would be considered systemic diseases in the United States (e.g., pyemia, septicemia, and toxemia). FSIS requires veterinarians to make final disposition on all retained carcasses domestically in the United States consistent with 9 CFR 311.

The FSIS auditors discussed with DEFRA and other CA officials the concern that carcasses and parts receiving final disposition by inspectors could be passed for human consumption when the same carcass and parts may have been condemned if the final dispositions were made by a veterinarian. The FSIS auditors verified through records review that the OV, OA, or MHI are

conducting post-mortem inspections daily in establishments eligible to export to the United States. The FSIS auditors also reviewed inspector training records highlighting the completion of post-mortem inspection requirements and identified the following finding in DEFRA's post-mortem inspection procedures:

- DEFRA, the CCA in the United Kingdom, does not ensure that final dispositions for carcasses with systemic diseases conditions are performed by a veterinarian during post-mortem inspection.

The FSIS auditors verified through records review that DEFRA ensures that a representative of the government makes periodic supervisory visits to each certified establishment to evaluate the performance of government inspection personnel. For newly approved establishments to export to the United States, monthly audits are conducted by the CA during the first 3 months, and once satisfactory standards have been demonstrated, the frequency reduces to quarterly audits.

Government EVAs in England and Wales assess the performance of contract employees against the written performance standards, better known as Key Performance Indicators (KPI), specified in their contract during the documented monthly-quarterly supervisory visits performed at all certified establishments. Audit reports are sent to the export veterinary leader (EVL) for evaluation and are maintained in the K2 database system. The EVL also provides the report to FSA then the report is provided to the establishment and the OV. Additionally, government field veterinary leaders and field veterinary coordinators perform random visits, during which they can intervene as required. FSA provides an overview of these supervisory visits in certified establishments in a published report. In England and Wales, in addition to the EVA audits, personnel performance evaluations of OVs are also conducted quarterly by the line manager who assesses their performance against the established KPIs. In Scotland, veterinary advisors (VA) assess technical competence of the OVs twice a year which may increase if the VA determines additional visits are warranted. The responsibility of periodic supervisory visits lies with the trade audit team which assesses the OV's performance against established KPIs on a quarterly basis. The assessment reports are documented and shared with the divisional veterinary officer. The FSIS auditors examined examples of OV supervisory reviews for each country and determined that reports are not final unless issues with performance requiring follow-up are resolved. In addition to CA's performance reviews, the FSIS auditors also reviewed audit reports from the third-party contactor in England and Wales. The audits are conducted quarterly by the manager of the contracting firm to evaluate establishment compliance with food safety requirements and assess the performance of OVs and OAs. The final report is shared with the field veterinary coordinator of FSA.

Through interviews and document review, the FSIS auditors confirmed that DEFRA ensures there is complete (spatial or temporal) separation of certified meat products from non-certified meat products during the production of meat products for export to the United States as required in the RMOP and Central Competent Authority Verification Procedures in USDA Approved Establishments Pork, Beef, and Lamb document. If meat used to produce product intended for export to the United States is sourced from another certified establishment within the United Kingdom or eligible foreign country, the meat is accompanied by IMC or by a SHA, both of which are verified by the OV. Both documents are utilized to facilitate the export of meat/meat products from the United Kingdom to countries outside the EU, including the United States, by

providing the necessary chain of evidence and custody that the meat products meet the specific requirements of the destination country when they move between establishments within the United Kingdom. During this review process, the OVs are responsible to check that all the meat establishments involved in the chain of production for the product are approved for export to the United States.

Through document review, the FSIS auditors determined that DEFRA ensures that meat products intended for export to the United States meet United States labeling requirements. Instructions for verification of labeling requirements for meat products intended for export to the United States are outlined in the RMOP (Section E.2 - Label) and CCA Verification (Section 6.1 - Labeling and Packaging Material) documents. The FSIS auditors examined a sample of a product label and determined that currently the label is generically approved by meeting all of FSIS' labeling requirements. RMOP (Section E.3 - Species testing) requires any establishment slaughtering multiple species or producing minced meat to implement a species testing program. Additionally, the OV can take an official sample for species testing if economic adulteration or comingling of products is suspected.

Through record review, the FSIS auditors verified that DEFRA ensures that meat products designated for export to the United States are not restricted by USDA APHIS. The United States country-specific export requirements, including relevant APHIS animal disease restrictions, are contained in NFG issued with the EHC. NFG are managed by APHA in England, Wales, and Scotland, and DAERA in Northern Ireland. Most export certificates for animals and animal products include statements certifying that specified areas or the entire country of origin are free of certain notifiable diseases or, in some cases, non-notifiable. The OV cannot certify these without specific authorization (NDCs) from APHA. For exports to the United States, authority to issue a statement indicating a shipment is free from a particular disease(s) on the certificate is given to the OV by issuing a 618NDC with the EHC for the consignment by APHA.

The FSIS auditors confirmed that DEFRA ensures that beef products are not contaminated with specified risk material (SRM) associated with bovine spongiform encephalopathy (BSE). Retained Regulation (EC) 999/2001 defines SRM and includes requirements for the removal of SRM in cattle. Instructions for implementing and verifying the requirements concerning identification, removal, and disposal of SRM are provided in the MOC (Chapter 2.7 - Specified Risk Material Control). Additional reinforcing controls specific to beef products intended for export to the United States are specified in Central Competent Authority Verification Procedures in USDA Approved Establishments Pork, Beef, and Lamb (Section 7.4 SRM). FSIS auditors did not identify any issues regarding the implementation of SRM controls.

In the United Kingdom, any parts of animals not harvested for human consumption (i.e., inedible) are considered and handled as Animal By-Products (ABP) in accordance with retained EU legislation and as reflected in the MOC. An ABP is the entire condemned body, a part of an animal, or product of animal origin which is not intended for human consumption. ABPs are categorized by risk, segregated, and processed accordingly. Retained Regulation (EC) 1069/2009 provides the requirements concerning ABPs, including the definition of the three (3) categories of ABPs that are produced from the processing of animals for human consumption. Retained Regulation (EC) 142/2011 describes the conditions of storage, handling, transport, and disposal

of APBs. The retained EU requirements are implemented through the MOC (Chapter 2.8 – Animal By-Products). Through document review and interviews, the FSIS auditors determined that the OVs and OAs assigned to certified establishments verify the separation, removal, denaturing, proper identification, and transportation of ABP. The auditors did not have any concerns regarding the control over ABP at certified establishments.

Except as noted above, the FSIS auditors concluded that the United Kingdom's food safety inspection system 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.

VI. COMPONENT THREE: GOVERNMENT SANITATION

The third equivalence component the FSIS auditors 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 (SPS) and sanitary dressing.

Provisions for maintaining sanitary conditions in establishments are contained in Annexes II and III of retained Regulation (EC) 852/2004. Chapter IV of retained Regulation (EC) 853/2004 describes the requirements for sanitary dressing of livestock throughout the slaughter operations. The United Kingdom implements procedures for sanitary dressing through slaughter hygiene verification (SHV) in slaughterhouses. The SHV system includes tasks that must be carried out for each of the processed species throughout the entire production process. The verification tasks are divided into the four categories that have different frequencies based on the associated risks and possible impact on public health: process – hygiene verification; product – carcasses and offal verification; plant – establishment verification; and HACCP and microbiological verification. Officials working in establishments certified as eligible to export to the United States must also verify daily the establishment's monitoring and verification of the CCP for zero tolerance of fecal, milk, and ingesta contaminants.

The SHV system provides an ongoing assessment of establishment compliance with food hygiene requirements from acceptance of the animals for slaughter through carcass dressing/offal harvesting and chilling, and carcass quartering and offal/co-product packing. The verification objective is to provide assurance that only meat that is free from visible contamination and produced in accordance with legislative requirements is placed on the market. The instructions for implementing these requirements are provided in the MOC (Chapter 2.4 Post-Mortem Inspection). The SHV system further requires taking the necessary corrective actions to rectify and isolate a contaminated carcass, including applying effective control measures to prevent recurrence. The MOC includes a summary of all verification tasks and their frequencies. The verification checks in process hygiene areas occur daily. Some frequencies, including for animal cleanliness, bleeding, and evisceration verification checks, may be reduced to once a week with OV approval that hygienic standards and certain other conditions are met. The FSIS auditors reviewed records documenting the verifiable elements of the SHV system at a certified establishment where fecal contamination was identified by the OV. Records showed that the

finding was immediately corrected per the establishment's procedure and corrective actions were verified by the OV.

In addition to complying with retained EU hygiene legislation for requiring food operating businesses to maintain sanitary operating conditions and prevent product contamination, the United Kingdom requires all certified establishments to meet FSIS requirements for sanitation consistent with provisions specified in 9 CFR Part 416. An establishment's compliance with these requirements is verified at the time the establishment is approved to export to the United States and on a regular basis thereafter during daily inspection by the OV and the monthly/quarterly audits conducted by the supervisory staff representing each CA in the United Kingdom.

DEFRA's instructions for verification of SPS requirements in certified establishments is outlined in Central Competent Authority Verification Procedures in USDA Approved Establishments Pork, Beef, and Lamb (Section 2.1 General). Establishment grounds and facilities, equipment and utensils, sanitary operations, and employee hygiene must ensure that conditions within and around the establishment are sanitary and sufficient to prevent adulteration of product. Compliance with SPS requirements is verified through direct observation and record review. Establishments must provide corrective actions in cases of noncompliance. Enforcement actions are taken in accordance with instructions provided in MOC Chapter 7 – Enforcement Policy in Approved Meat Plants.

Section A.2. of the RMOP mandates that establishments certified to export to the United States must develop, implement, and maintain written procedures for the actions they take daily, before and during operations, to prevent product from being directly contaminated and adulterated. The Sanitation SOP must cover the scheduled, daily pre-operational and operational cleaning, and sanitation of equipment and surfaces that may contact the product directly. Instructions for verifying Sanitation SOP requirements in certified establishments are provided in Central Competent Authority Verification Procedures in USDA Approved Establishments Pork, Beef, and Lamb (Section 3-Sanitaion-Verification of Sanitation Standard Operational Procedures (SSOP)). This document also provides DEFRA's requirement for the content and design of the Sanitation SOP program, including its development, implementation, and maintenance as well as corrective actions and recordkeeping. The OVs or their designees verify through observation and record review that pre-operational and/or operational sanitation are properly implemented.

The FSIS auditors reviewed OV verification checklists, including DEFRA's Form 7, which is used to document operational sanitation, and Form 8, which is used to document pre-operational verification results for review, observation, and record keeping at specified risk-based intervals ranging from daily to weekly to monthly. Review of documented noncompliance provided details as to type and nature and degree of the finding, the establishment's corrective measures, and the closing date of the issue. The documents reviewed by FSIS auditors confirmed that the certified establishments' procedures verified are consistent with DEFRA's requirements and no concerns were identified.

Isolated findings related to the verification of sanitation requirements identified during the previous FSIS audit in 2019 were corrected by establishments and verified by OVs, then a follow-up audit was conducted by EVAs.

The FSIS auditors determined that DEFRA requires establishments exporting to the United States to develop, implement, and maintain sanitation programs, including requirements for SPS, Sanitation SOPs, zero tolerance, and sanitary dressing.

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

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

DEFRA requires all certified establishments to develop, implement, and maintain a HACCP system that identifies, prevents, and controls the food safety hazards of concern. HACCP system requirements are mandated through relevant articles of retained Regulations (EC) 852/2004, (EC) 853/2004, (EU) 2017/625, (EU) 2019/624 and (EU) 2019/624 are implemented through MOC (Section 4.2 – HACCP Based Procedures). Additionally, OVs at certified establishments must verify all requirements in RMOP Section A.3. HACCP, UK CCA Pork USDA Approval Procedure for Slaughter and Processing Establishments for Export of Pig Meat to USA and Export of Beef and Lamb to USA Establishment Approval, 3 – HACCP, and Central Competent Authority Verification Procedures in USDA Approved Establishments Pork, Beef, and Lamb, 4-HACCP Plan - Verification and Implementation. The requirements in RMOP are consistent with FSIS requirements in 9 CFR 417.

DEFRA has developed a variety of verification checklists to capture HACCP-related requirements for OVs and OAs to verify compliance when conducting inspection activities in the establishments certified for export to the United States. The FSIS auditors conducted interviews with DEFRA representatives and reviewed verification documents pertaining to HACCP systems for the pork and beef slaughter establishments certified to export to the United States. OVs and OAs document verification activities on a daily checklist that includes verification of establishments' monitoring, verification, and recordkeeping of their CCP for zero tolerance of fecal, milk, and ingesta. The checklist is consistent with FSIS requirements in 9 CFR 417. The FSIS auditors also examined a sample of HACCP noncompliance records and government inspection follow-up verification activities from the selected establishments. In each case of noncompliance, the establishment was required to implement corrective actions consistent with FSIS requirements specified in 9 CFR 417.3. DEFRA requires the OV or OA assigned to establishments certified to export to the United States to complete several forms to document other aspects of the HACCP system including for CCPs other than zero tolerance, HACCP reassessment, and HACCP record keeping requirements including pre-shipment review.

Lastly, the FSIS auditors reviewed reports for audits conducted by EVA regarding the establishment's compliance with HACCP system requirements. EVA audits are conducted monthly at newly certified establishments and are reduced to quarterly provided that the

establishment demonstrates satisfactory performance for the previous 3 months. All HACCP requirement tasks are reviewed at least once in the audit cycle annually.

The FSIS auditors determined that DEFRA requires establishments exporting products to the United States to develop, implement, and maintain a HACCP system for each processing category consistent with criteria established for this component.

VIII. COMPONENT FIVE: GOVERNMENT CHEMICAL RESIDUE TESTING PROGRAMS

The fifth equivalence component the FSIS auditors 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.

Prior to conducting the remote audit, FSIS technical experts reviewed the United Kingdom's NRSS, previous testing results, associated methods of analysis, and additional SRT responses describing the United Kingdom's chemical residue testing program.

The main objectives of the United Kingdom's NRSS are to ensure the safety of food products which must be free of authorized, unauthorized, and illegal substances, and environmental contaminants, including pesticides, in animal products. This includes detection of chemical residue contamination in foods for the United Kingdom's domestic market or for other international markets. The VMD investigates incidents when violations are noted and applies appropriate regulatory enforcement actions when warranted. The United Kingdom's legal authority for the NRSS is in retained EU Council Directives and national legislation governing chemical residue controls in human foods including meat products derived from animals. The retained EU regulations pertaining to requirements for chemical residue contamination controls are Council Directives 96/22/EC, 96/23/EC, Commission Decision 97/747/EC, Regulation (EC) No. 178/2002, and Regulation (EU) 2017/625, which collectively require establishments to develop and implement chemical residue control programs that include random sampling of carcasses for chemical residues identified by the exporting country's meat inspection authorities or by FSIS as potential contaminants. The relevant national legislations authorize the CA in each country in the United Kingdom to develop, implement, and enforce the requirements of the national laws and retained EU regulations pertaining to NRSS. The Animals and Animal Products (Examination for Residues and Maximum Residue Limits) Regulation was enacted in 2015 in England and Scotland, 2016 in Northern Ireland, and 2019 in Wales.

VMD, an agency within DEFRA, is responsible for development, coordination, implementation, and enforcement of the annual NRSS in Scotland, England, and Wales, and with DAERA's collaboration in Northern Ireland. VMD develops an annual plan that includes the number of tests to be conducted, analytical methods, species targeted, product types, and testing frequencies assigned to slaughter establishments and stock farms.

Samples collected for analysis as part of the NRSS include samples for surveillance, for animals with suspect pathology, and for on-farm samples from live animals. The FSIS auditors reviewed

sample allocation and collection information in the United Kingdom and confirmed that OVs and OAs follow instructions consistent with the MOC (Section 5.1). When a nonconformant residue result identifies an authorized substance above the established tolerance or maximum residue limit, or when an unauthorized substance is identified, APHA or DAERA conducts a follow-up investigation at the farm of origin. Establishments certified to export product to the United States are required to ensure that meat products from any carcass selected for testing in the NRSS are excluded from export to the United States. Alternatively, the products can be certified for export to the United States only after non-violative test results are received. DEFRA has mandated the above referenced requirements per RMOP section F- Residue Samples.

The FSIS analysis and remote verification activities indicate that DEFRA continues to maintain overall authority for a chemical residue testing program which is designed and implemented to prevent and control the presence of veterinary drugs and contaminants in meat products exported to the United States.

IX. COMPONENT SIX: GOVERNMENT MICROBIOLOGICAL TESTING PROGRAMS

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

Prior to the onsite visit, FSIS technical experts reviewed the United Kingdom's national microbiological sampling and testing programs, laboratory methods of analysis, and additional SRT responses describing DEFRA's microbiological verification sampling and testing programs.

The FSIS auditors verified that DEFRA requires all slaughter establishments certified to export product to the United States to collect and analyze cattle and swine carcass samples for intestinal or fecal indicator organisms in accordance with retained Regulation (EC) 2073/2005 (as amended). Specific testing requirements are found in RMOP and Central Competent Authority Verification Procedures in USDA Approved Establishments Pork, Beef, and Lamb and indicate that certified establishments must test cattle and swine carcasses for Enterobacteriaceae at a pre-chill location as described in Regulation (EC) 2073/2005. Certified establishments can also choose to test for generic *E. coli* in cattle or swine carcasses consistent with FSIS requirements in 9 CFR 310.25,[2] but this testing is in addition to requirements for testing in accordance with Regulation (EC) 2073/2005. The inspection data reviewed by FSIS auditors confirmed that all establishments selected for this remote audit are conducting testing consistent with Regulation (EC) 2073/2005. The FSIS auditors reviewed inspection verification documents used by OVs or their designees to document outcomes related to compliance with microbiological testing, frequencies, and other requirements in Regulation (EC) 2073/2005. The FSIS auditors did not identify any concerns with microbiological sampling and testing of cattle and swine carcasses for indicator organisms.

[2] FSIS notified eligible foreign countries of new regulations for U.S. swine slaughter establishments and continues to ensure that the countries implement equivalent sampling and analysis for microbial organisms for monitoring process control throughout slaughter and dressing operations consistent with U.S. requirements in 9 CFR 310.18.

DEFRA requires establishments certified to export to the United States to implement *Salmonella* testing programs to test swine and cattle carcasses in accordance with requirements of Regulation (EC) 2073/2005. Samples are collected by trained employees at the establishments under the supervision of the OV or other ancillary inspection personnel. The FSIS auditors reviewed inspection verification documents for *Salmonella* sampling programs and confirmed that the OV or OA routinely verify microbiological testing programs with procedures and frequencies described in the RMOP. The FSIS auditors also noted that the CA auditors routinely evaluate *Salmonella* performance standards during their monthly or quarterly audits of the certified establishments. The FSIS auditors did not identify any concerns during the review of the *Salmonella* sampling program.

The STEC sampling requirements for exports to the United States are outlined in the RMOP. This document mandates that certified bovine slaughter establishments develop and implement a written sampling plan detailing the microbiological criteria to be met, sampling methods, place and frequency of sampling, employee training, sample storage and transportation, and analytical methods employed for testing for *E. coli O157:H7* and non-O157 STEC, including serogroups O26, O103, O111, O121, O45, and O145. Additionally, establishments are to establish criterion for high event periods consistent with FSIS' Directive 10,010.3 Traceback Methodology for *Escherichia coli* (*E. coli*) O157:H7 in Raw Ground Beef Products and Bench Trim. Establishments are to ensure that all lots of products destined for export to the United States are microbiologically independent.

The official government microbiological sampling and testing programs for *E. coli* O157:H7 and non-O157 STEC in beef manufacturing trimmings, raw ground beef products, and other components for raw ground beef are described in the Central Competent Authority Verification Procedures in USDA Approved Establishments Pork, Beef, and Lamb. The government's STEC sampling verification program is consistent with FSIS' sampling verification activities contained in FSIS' Directive 10,010.1 Sampling Verification Activities for Shiga Toxin-Producing *Escherichia Coli* (STEC) in Raw Beef Product. N60 samples for STEC testing are collected by OVs on randomly selected lots of trim eligible for export to the United States. Samples are collected one to four times a month, based on the volume of product produced daily for export to the United States. All samples are analyzed using a laboratory method consistent with FSIS' MLG Method 5C.00 - Detection, Isolation and Identification of Top Seven Shiga Toxin-Producing Escherichia coli (STECs) from Meat Products and Carcasses and Environmental Sponges.

Lots that are positive for STEC are excluded from export to the United States. The establishment must investigate the cause for the failure, including review of records related to SPS, SSOP, and HACCP, and must implement effective corrective actions to prevent recurrence of the failure. The FSIS auditors interviewed government officials from FSA, FSS, and DAERA and reviewed documents related to official STEC testing results and monthly/quarterly audits conducted by CA and did not identify any concerns.

The FSIS auditors determined that DEFRA maintains the overall authority to implement its microbiological sampling and testing programs to ensure that meat products exported to the United States are unadulterated, safe, and wholesome.

X. CONCLUSIONS AND NEXT STEPS

An exit meeting was held June 24, 2022, by videoconference with DEFRA. At this meeting, the FSIS auditors presented the preliminary findings from the audit. An analysis of the findings within each component did not identify any deficiencies that represented an immediate threat to public health. The FSIS auditors identified the following finding:

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

- The Department of Environment Food and Rural Affairs (DEFRA), the Central Competent Authority (CCA) in the United Kingdom, does not ensure that final dispositions for carcasses with systemic disease conditions are performed by a veterinarian during post-mortem inspection.

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

Appendix: Foreign Country Response to the Draft Final Audit Report

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7 December 2022

Dear Dr Catlin

Response to the draft final report of the remote verification audit of the United Kingdom, evaluating the food safety system governing meat products exported to the United States of America

I hope this letter finds you well. I am writing in response to your letter, received on 11 October 2022, containing the draft final report on the remote verification audit of the United Kingdom's (UK's) meat production system conducted by the USDA Food Safety Inspection Service (FSIS) between May 10–June 24, 2022.

I would like to thank you and your officials for the ongoing support to progress this work. I am pleased that your analysis of the findings within each component did not identify any deficiencies that represented an immediate threat to public health.

I acknowledge the finding identified by the FSIS auditors under component two, 'Government statutory authority and food safety and other consumer protection regulations', as follows:

The Department of Environment Food and Rural Affairs (DEFRA), the Central Competent Authority (CCA) in the United Kingdom, does not ensure that final dispositions for carcasses with systemic disease conditions are performed by a veterinarian during post-mortem inspection.

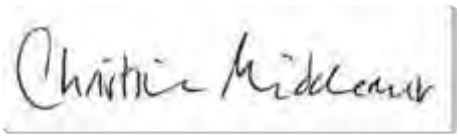
Our response to this finding was discussed in the closing meeting of the virtual audit on 24 June 2022 and is attached here as a written summary (Annex A). Additional documents providing further evidence on this matter are also attached (Annexes B-D and enclosures 1-8).

I hope that this information will address the finding, and that the process currently in place in the UK provides you with relevant assurances.

Finally, I would like to express once again my sincere thanks to you and your officials for the collaboration involved in the virtual audit. We hope that we can host a physical inspection when the next audit is due and look forward to being able to welcome FSIS colleagues back to the UK.

If you require anything further, please do not hesitate to contact me

Yours sincerely



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Annexes

Annex A – Defra initial summary response to the finding of current process employed in the UK relating to the dispositions for carcasses with systemic disease conditions: Closing Meeting, 24 June 2022

Annex B – The legal framework relating to the dispositions for carcasses with systemic disease conditions

Annex C – The relevant section from the UK Manual for Official Controls (MOC) describing the tasks, responsibilities when performing official controls in approved establishments. (Enclosures 1 and 2 supplement this annex)

Annex D – Details of the training of Official Auxiliaries/Meat Hygiene Inspectors and the Supervisory control of the Official Auxiliary by the Official Veterinarian (Enclosures 3-8 supplement this annex)

Annex A

Defra's initial response to the finding of current process employed in the UK relating to the dispositions for carcasses with systemic disease conditions

The main point to clarify in response to the finding is that in the UK, Official Veterinarians (OVs) are ultimately responsible for the performance of post-mortem inspection (PMI) and for the final disposition of carcasses with systemic disease conditions. They are also responsible for the application of the health mark, as required under the EU retained law.

In all UK abattoirs, Official Auxiliaries (OAs), also known as Meat Hygiene Inspectors (MHIs), work under the constant supervision of the OV. OVs have a full-time presence in the plant during operating hours.

Although the final responsibility for inspection sits with the OV, they may delegate the delivery of some official controls (OC) to the OA/MHI (will refer to this role as OA in the rest of this doc).

The Official Control Regulation (OCR) (Regulation (EC) 2017/625) specifies the rules under which the OV may designate tasks to an OA, within the OC framework (see Annex B). This legislation is communicated to staff carrying out official controls in approved establishments via the UK Manual for Official Controls (MOC) (Annex C).

Under the UK's PMI procedures OAs put aside for OV inspection the following:

- Carcasses of animals designated as suspected of having a disease or condition that may adversely affect human health at ante-mortem inspection
- Carcasses of animals that contain lesions consistent with tuberculosis
- Carcasses that display disease conditions (or other signs) or herd history that warrant residue testing; and
- Carcasses that display signs of uncommon disease conditions at post-mortem examination that could reasonably result in condemnation or restriction (e.g., pass for cooking).

The OV will take the final decision to declare meat as unfit for human consumption where uncommon conditions are identified and pose a threat to public or animal health.

OAs must successfully complete training to the requirements in Regulation (EC) 2019/624, before they can perform PMIs at approved sites. In collaboration with the Food and Drink Qualifications (FDQ) and Royal Society of Public Health (RSPH), the Food Safety Competent Authorities (FSCAs) have developed an exhaustive training and assessment programme. The aim of the programme is to offer an accredited qualification in Meat Inspection – Level 4 Diploma of Proficiency in Meat Inspection (see Annex D). This qualification comprises of almost 1000 hours (theoretical and practical) training and

provides clear instructions in how to perform the PMI. It also emphasises the importance of keeping regular communication of PMI findings with their supervising OV.

This comprehensive training ensures OAs are competent to implement effective PMIs and identify common and unusual lesions. Furthermore, the OV supervises OA duties to ensure that health marked carcases and associated body parts are free from all pathological conditions and that post-mortem inspection has been carried out in accordance with legal requirements (see Annex D).

Conclusion

Defra is confident that UK meat inspection system complies with FSIS Directive 6100.2 Revision 1, aligned with 9 CFR 311. The primary objective of the OV is to ensure meat entering the food chain does not adversely affect public or animal health. We believe that the summary above and the supporting evidence included in the annexes below, demonstrate that this is achieved by the robust training and supervision framework implemented across UK.

Annex B

Relevant UK legal framework relating to the dispositions for carcasses with systemic disease conditions

The main objective of the UK agri-food chain legislation is to attain high levels of consumer protection. In addition, it seeks to ensure that activites which may have a potential impact on the safety of the agri-food chain are performed in accordance with relevant requirements. UK national legislation implements the (retained) European Union OCR 2017/625. This means that via the delivery of official controls, only food that is fit for human consumption reaches the market. In turn, this ensures the environment is protected and consumer safety is maintained.

Food Safety Competent Authority Roles and Responsibilities in the UK

This legislative detail in Article 1 of (retained) European Union regulation 2017/625 outlines the performance of official controls and other official activities by the competent authority.

Article 18 provides specific rules for official controls and actions taken by the competent authorities in relation to the production of products of animal origin intended for human consumption:

1*. Official controls performed to verify compliance with the rules referred to in Article 1(2) of this Regulation in relation to products of animal origin intended for human consumption shall include the verification of compliance with the requirements laid down in Regulations (EC) No 852/2004, (EC) No 853/2004, (EC) No 1069/2009 and (EC) No 1099/2009 as applicable.*

These regulations are Hygiene of Foodstuffs, Specific Hygiene rules for Food of Animal Origin, Food and Feed Safety and Protection of Animals at the Time of Killing.

Article 3 Paragraph 49 of same regulation gives the definition of an OA ‘official auxiliary’, also known as Meat Hygiene Inspector (MHI)

‘Official Auxiliary’ means a representative of the competent authorities trained in accordance with the requirements established under Article 18 and employed to perform certain official control tasks or certain tasks related to other official activities;

Article 17 (b) defines how Official Veterinarians are able to assign actions to Official Auxiliaries.

(b) 'under the supervision of the official veterinarian' means that an action is performed by an official auxiliary under the responsibility of the official veterinarian and the official veterinarian is present on the premises during the time necessary to perform that action;

This means that an OA operating in food businesses can, and do, operate under the supervision of an OV.

Retained (EC) regulation 2017/625 Article 18 (2) *(c)* states that; *the post-mortem inspection performed by an official veterinarian, under the supervision of the official veterinarian or, where sufficient guarantees are in place, under the responsibility of the official veterinarian;*

Article 18 Paragraph 5 states; *The official veterinarian shall remain responsible for the decisions taken following official controls provided for in paragraphs 2 and 4, even if the performance of an action is assigned by him or her to the official auxiliary.*

OAs are under the supervision of the OV and the OV remains responsible for the decisions OA's take.

Application of the Health Mark

The Health Mark is only applied when the official controls have not identified any shortcoming that would make meat unfit for human consumption. It can be applied by an OA under the supervision of an OV, in accordance with 2017/625 Article 18 (2) (c).

Article 18 paragraph 4 states; *where the official controls identified in points (a) and (c) of paragraph 2 above* (which are ante-mortem and post mortem inspection) *have NOT identified any shortcoming that would make meat unfit for human consumption, the health mark shall be applied to domestic ungulates, farmed game mammals other than lagomorphs, and large wild game, by the official veterinarian, under the supervision of the official veterinarian, under the responsibility of the official veterinarian or, in compliance with the conditions laid down in paragraph 3, by the slaughterhouse staff.*

The Health Mark is applied under the supervision of the OV. The OV undertakes regular PMI checks to verify OA performance. This provides governance relating to the OV responsibility for the delivery of official controls within their establishment and the decisions taken following official controls. This maintains the legislative requirement that although the performance of the actions has been delegated, the OV remains responsible for the decisions taken, in line with official control requirements.

Retained EU Regulation 2019/627 Chapter V, Article 48; *Technical requirements of the health mark and practical arrangements for its application*

1. The official veterinarian shall supervise health marking and the marks used.

2. The official veterinarian shall ensure, in particular, that: (a) the health mark is applied only to domestic ungulates and farmed game mammals other than lagomorphs, having undergone ante-mortem and post-mortem inspection, and large wild game having undergone post-mortem inspection, in accordance with Article 18(2)(a), (b) and (c) of Regulation (EU) 2017/625, where there are no grounds for declaring the meat unfit for human consumption.

Decisions Concerning Fresh Meat (carcases)

As required by EU retained Regulation 2019/627 Article 45, Official Veterinarians must declare fresh meat unfit for human consumption if it:

(a) derives from animals that have not undergone ante-mortem inspection in accordance with Article 18(2)(a) or (b) of Regulation (EU) 2017/625, except for wild game and stray reindeer referred to in Article 12(1)(b) of Delegated Regulation (EU) 2019/624;

(b) derives from animals whose offal has not undergone post-mortem inspection in accordance with Article 18(2)(c) of Regulation (EU) 2017/625, except in case of viscera of large wild game that do not need to accompany the body to a game-handling establishment in accordance with point 4 of Chapter II of Section IV in Annex III of Regulation (EC) No 853/2004;

(f) derives from animals affected by a generalised disease, such as generalised septicaemia, pyaemia, toxaemia or viraemia;

(o) indicates pathological or organoleptic changes, in particular a pronounced sexual odour or insufficient bleeding (except for wild game);

(t) in the opinion of the official veterinarian, after examination of all the relevant information, may constitute a risk to human or animal health or is for any other reason not suitable for human consumption;

The OA ensures that only meat that is fit, is health marked and eligible for human consumption. Health marks are only applied where inspections have NOT identified any issues which would result in the meat being unfit for human consumption.

Any carcases which do not meet this criterion, are condemned/excluded from the food chain by the OA. In these circumstances the OV will take the final decision to condemn meat where uncommon conditions are identified and pose a threat to public or animal health.

Performance of post-mortem inspections by the Official Veterinarian

As required by retained (EU) Regulation 2019/624, Article 8, post-mortem inspection shall be performed by the official veterinarian in the following cases:

(a) animals that undergo emergency slaughter as referred to in Chapter VI of Section I of Annex III to Regulation (EC) No 853/2004;

(b) animals suspected of having a disease or condition that may adversely affect human health;

(c) bovine animals from herds that have not been declared officially free of tuberculosis;

(d) bovine, ovine and caprine animals from herds that have not been declared officially free of brucellosis;

(e) outbreak of animal diseases for which animal health rules are laid down in Union legislation. This concerns animals susceptible to the particular disease in question that come from the particular region as defined in Article 2(2)(p) of Directive 64/432/EEC;

(f) when stricter controls are necessary to take account of emerging diseases or particular diseases listed by the World Organisation for Animal Health;

(g) in case of derogation on the timing of post-mortem inspection in accordance with Article 13 of Implementing Regulation (EU) 2019/627.

Annex C

UK Manual for Official Controls (MOC)

The MOC describes the tasks, responsibilities and duties of our staff carrying out official controls in approved establishments. It also provides the legal requirements and standards for approved meat establishments.

Chapter 2.4 states (see also Enclosure 1):

2.1.5 OV presence (on the line)

The OV needs not be present at all times on the line during post-mortem inspection if:

- an MHI carries out post-mortem inspection and puts aside abnormal meat with uncommonly occurring conditions and all other meat from the same animal
- the MHI documents their procedures and findings in a manner that allows the OV to be satisfied that standards are being met
- the OV subsequently inspects all such meat The MHI may discard meat from poultry and rabbits with abnormalities and the OV need not systematically inspect all such meat

2.1.7 Abnormal meat

To consider an abnormal carcase meat/offal as 'uncommon', we could take into consideration different aspects such as:

- prevalence of the condition in the area
- prevalence of the condition in the flock / herd (degree of infection or infestation)
- the possible human health implications of the condition (such as zoonoses)
- the possible animal health implications of the condition (such as lesions which may indicate a possible notifiable disease such as classical swine fever, foot and mouth disease)
- possible animal welfare problems on farm, during transport or in the lairage
- the need to refer it to the veterinarian to do a differential diagnosis
- economic importance of the condition for the farming industry (degree of infestation)

Based on all the above, the MHI will need to make a judgement and notify the OV of the findings.

2.1.8 Examples of abnormal conditions that can be classified as common or uncommon

The table below outlines abnormal conditions and their classification.

Abnormal condition	Comments	Occurrence
Broilers septicaemia / toxaemia	Very prevalent condition. It represented 14.75% of total conditions rejected in 2004.	Common

Mastitis in older cattle	Common condition in all species, especially cows. No need to inform the OV as the farmer is already aware and will receive notification when he is informed about the post-mortem inspection records.	Common
Sheep caseous lymphadenitis	Is becoming more common but the OV needs to be made aware because of the economic importance of the disease (responsible for 1% of condemnations at meat inspection). The veterinarian doing a differential diagnosis.	Uncommon
Cattle (30 month or younger) fascioliasis	Common in ungulates. The OV does not need to be informed. The disease is of great economic importance because of liver condemnations. The farmer will be informed when he receives notification of the post-mortem inspection findings.	Common
Pigs pleurisy / pneumonia	Inflammation of the pleurae is a common meat inspection lesion in pigs. It requires the stripping of the pleura or removal of the rib cage, but carcase condemnation is not normally necessary. There is positive correlation between the number of carcases requiring lung condemnation and the number of those requiring pleura stripping. The OV does not need to be informed	Common
Sheep anthrax	Normally identified at ante-mortem inspection if a suspect animal is found dead in the lairage. It is a notifiable disease, and it is a zoonoses. The OV must be informed and should immediately inform the APHA Duty Veterinarian.	Uncommon
Broilers mechanical damage	This is normally the result of poor functioning of the poultry plant machinery. The FBO has to be informed by the MHI if he has not already identified the problem.	Common
Cattle sarcocystis	The incidence is higher in older cattle but is an uncommon condition. Depending on the degree of infestation, the carcase and viscera have to be rejected. The OV should be informed.	Uncommon
Pig ascariasis	The second most recorded condition at post-mortem in pigs (17% of total rejections in	Common

(milk spot)	2004). It is mainly identified in livers (‘milk spot’) which are unfit for human consumption. The farmer will be informed when he receives the post-mortem inspection report. The OV does not need to be informed	

2.4.5 Meat declared unfit

Where the OV is not satisfied that the meat is fit for human consumption, the health mark / identification mark must not be applied. The FBO should be asked to voluntarily surrender meat rejected as unfit for human consumption. Where surrender is not forthcoming, the OV should put in writing the reasons why they are formally declaring the meat unfit for human consumption in accordance with (retained) Regulation 2017/627 Article 48, 2(a).

2.4.6 Further inspection required

If the OA considers that the carcase and offal require further inspection, the carcase and the associated offal must be detained and kept under control of the OV pending the inspection.

We enclose the Post-mortem conditions cards (see Enclosure 2) which provide details of the common disease conditions. . These condition cards are used as reference when doing post-mortem inspection of cattle, sheep and pigs . They are also used when forming the decision-making guidelines.

Annex D

Training of Official Auxiliaries/Meat Hygiene Inspectors

Specific minimum requirements for the official auxiliary training/meat inspectors is set out in retained Regulation (EU) 2019/624. The Regulation refers to meat inspectors as 'Official Auxiliaries'.

Annex II, Chapter II of this Regulation covers the requirements for training for meat inspectors as follows:

OFFICIAL AUXILIARIES

1. Only people who have undergone training and passed a test in accordance with the requirements set out in point 5 are allowed to carry out the tasks of an official auxiliary.

2. The competent authority must make arrangements for such tests. To be eligible for these tests, candidates must prove that they have received:

(a) at least 500 hours of theoretical training and at least 400 hours of practical training, covering the areas specified in point 5; and

(b) any additional training as is required to enable official auxiliaries to undertake their duties competently.

3. The practical training referred to in paragraph 2(a) is to take place in slaughterhouses and cutting plants, under the supervision of an official veterinarian.

4. Training and tests are to concern principally red meat or poultry meat. However, person who undergo training for one of the two categories and passed the test need only undergo abridged training to pass the test for the other category. Training and test should cover wild game, farmed game and lagomorphs, where appropriate.

5. Training for official auxiliaries is to cover, and tests are to confirm knowledge of, the following subjects:

(a) in relation to holdings:

(i) theoretical part:

— familiarity with the farming industry organisation, production methods, international trade etc.,

— good livestock husbandry practices,

— basic knowledge of diseases, in particular zoonosis — viruses, bacteria, parasites etc.,

— monitoring for disease, use of medicines and vaccines, residue testing,

— hygiene and health inspection,

— animal welfare on the farm and during transport,

— environmental requirements — in buildings, on farms and in general,

— relevant laws, regulations and administrative provisions,

— consumer concerns and quality control;

(ii) practical part:

— visits to holdings of different types and using different rearing methods,

— visits to production establishments,

— observation of the loading and unloading of animals,

— laboratory demonstrations,

— veterinary checks,

— documentation;

(b) in relation to slaughterhouses and cutting plants:

(i) theoretical part:

— background related to meat industry organisation, production methods, international trade standards for food and slaughter and cutting technology,

— basic knowledge of hygiene and good hygienic practices, and in particular industrial hygiene, slaughter, cutting and storage hygiene, hygiene of work,

— basic knowledge of HACCP and the audit of HACCP-based procedures,

— animal welfare on unloading after transport and at the slaughterhouse,

— basic knowledge of the anatomy and physiology of slaughtered animals,

— basic knowledge of the pathology of slaughtered animals,

— basic knowledge of the pathological anatomy of slaughtered animals,

— relevant knowledge concerning TSEs and other important zoonosis and zoonotic agents, as well as important animal diseases;

— knowledge of methods and procedures for the slaughter, inspection, preparation, wrapping, packaging and transport of fresh meat,

— basic knowledge of microbiology,

— ante-mortem inspection,

— examination for trichinosis,

— post-mortem inspection,

— administrative tasks,

— knowledge of the relevant laws, regulations and administrative provisions,

— sampling procedure,

— fraud aspects;

(ii) practical part:

— animal identification,

— age checks,

— inspection and assessment of slaughtered animals,

— post-mortem inspection in a slaughterhouse or game-handling establishment,

— sampling and analysis for Trichinella,

— identification of animal species by examination of typical parts of the animal,

— identifying and commenting on parts of slaughtered animals in which changes have occurred,

— hygiene control, including the audit of the good hygiene practices and the HACCP-based procedures,

— recording the results of ante-mortem inspection,

— sampling,

— traceability of meat,

— documentation such as evaluation of food chain information and record reading.

The competent authorities may decide to reduce training and tests as regards: (a) the theoretical part if the official auxiliary demonstrates sufficient education on specific bullet points laid down in point 5(a)(i) or (b)(i) of this Chapter; (b) the practical part if the official auxiliary demonstrates sufficient working experience on specific bullet points laid down in point 5(a)(ii) or (b)(ii) of this Chapter.

6. The official auxiliary must have aptitude for multidisciplinary cooperation.

7.Official auxiliaries are to maintain up-to-date knowledge and to keep abreast of new developments through regular continuing education activities and professional literature. The official auxiliary is, wherever possible, to undertake annual continuing education activities.

8. Persons already appointed as official auxiliaries must have adequate knowledge of the subjects mentioned in paragraph 5. Where necessary, they are to acquire this knowledge through continuing education activities. The competent authority is to make adequate provision in this regard.

9. If official auxiliaries carry out only sampling and analysis in connection with examinations for Trichinella and microbiological criteria, the competent authorities are only required to ensure that they receive training appropriate to these tasks.

10. Mutual recognition of the tests for official auxiliaries between Member States must apply, when professionals move cross-border or wish to establish themselves in another Member State. In such case the tests must be limited to subjects, essential for human health and animal health protection in the Member States of employment, but not covered by the tests in the Member State of origin.

These training requirements for meat are affected by completing the following vocational qualification: Level 4 Diploma of Proficiency in Meat Inspection (Guided Learning Hours: 589). The Official Auxiliary Training project is national registered under the National qualification framework.

We enclose with this report the following documents – as Enclosures 3 to 7:

3. FDQ Level 4 Diploma for Proficiency in Meat Inspection - Qualification Overview
4. FDQ Level 4 Diploma For Proficiency in Meat Inspection - content of the Trainee Meat Inspector Portfolio
5. Post-Mortem Inspections – Normal and Abnormal Meat
6. Importance of Communicating findings to Official Veterinarian
7. Meat Inspector Training on Epizootic Disease Awareness

<u>Supervisory control of the Official Auxiliary by the Official Veterinarian</u>

In the UK, supervisory control, assessment of OA performance and decision making under the supervision of the OV, is via implementation of Post-Mortem Inspection and Verification.

Inspection and verification is performed daily by the OV on duty in the premises. It involves the OV inspecting, on an unannounced basis, the application of Post-mortem official controls and decision making by the OA.

Deficiencies are recorded:

In Great Britain;

> In accordance with the Slaughter Hygiene Verification system - product verification: On an ongoing basis, the OV will verify a sample of carcases and offal (including fifth quarter product) which have been health marked. The verification checks should reflect the full range of species and age / type of animal being processed. Only the final product (carcases or offal) should be verified, and the following production stages could be selected for carrying out the checks:
>
> - immediately after inspection points (after final rectification by the FBO) – to ensure real time checks
> - in the chiller

Verification of offal includes parts that are fit for human consumption at the inspection point (such as liver, heart, and skirt). Others intended as edible co-products which require further processing prior to being eaten (for example, tripe and casings) should also be included in the verification checks

Area of verification

- Scope 1 Pathology: Meat is free from all pathological conditions
- Scope 2 Statutory requirements: Post-mortem inspection has been carried out in accordance with legal requirement.

In Northern Ireland;

A Post Mortem Inspection Verification system is delivered by the OV or the OAs supervisor. Results of this are compiled by completing the VPH22 template (see Enclosure 8). This is where incorrect post-mortem examination or incorrect decision making/use of the health mark by OAs would be discovered. Any deficiencies are followed up with the Official Auxiliary, either directly, or via the OAs supervisor. Immediate steps are taken to rectify these, ranging from replacement of the OA with another suitably trained, (with immediate effect), or constant supervision, support, and training of the OA. The OV is kept informed at all times. Results of red meat post mortem verification are recorded on the post mortem verification form, VPH 22.