United States Department of Agriculture

Food Safety and
Inspection Service

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FEB 14 2023

Dr. Albertine Shilongo
Acting Chief Veterinary Officer
Directorate of Veterinary Services
Ministry of Agriculture, Water and Land Reform (MAWLR)
P/Bag 12022
Windhoek, Namibia

Dear Dr. Shilongo,

The United States Department of Agriculture (USDA), Food Safety and Inspection Service (FSIS) conducted an onsite verification audit of Namibia's inspection system July 18–22, 2022. FSIS provided Namibia with a draft audit report, and Namibia provided responses to that draft report. FSIS is evaluating your response, including Namibia's preliminary corrective actions, and will be evaluating those actions to determine whether Namibia 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 Namibia are included as an attachment to the report.

Sincerely,

Michelle Catlin, PhD
International Coordination Executive
Office of International Coordination

Enclosure

FINAL REPORT OF AN AUDIT CONDUCTED IN THE

REPUBLIC OF NAMIBIA

JULY 18 – 22, 2022

EVALUATING THE FOOD SAFETY SYSTEM GOVERNING

RAW INTACT BEEF PRODUCTS

EXPORTED TO THE UNITED STATES OF AMERICA

February 13, 2023

Food Safety and Inspection Service
United States Department of Agriculture

Executive Summary

This report describes the outcome of an onsite equivalence verification audit of Namibia conducted by the U.S. Department of Agriculture's Food Safety and Inspection Service (FSIS) July 18 – 22, 2022. The purpose of the audit was to verify whether Namibia's food safety inspection system governing raw intact beef 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. Namibia currently exports only raw intact beef to the United States.

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

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

GOVERNMENT SANITATION

- The Directorate of Veterinary Services (DVS), the Central Competent Authority (CCA) in Namibia did not ensure government inspection personnel were following requirements for verification of sanitation standard operating procedures (Sanitation SOP) as described in Circular No. V3/2018. Government inspection personnel did not ensure that (a) the establishment's Sanitation SOP program was signed and dated by an establishment employee with overall authority; (b) the establishment's Sanitation SOP program specified the frequency at which operational sanitation procedures are to be conducted, or (c) the establishment quality assurance personnel were documenting the daily operational sanitation procedures and frequency on the Sanitation SOP monitoring records.

GOVERNMENT HACCP SYSTEM

- DVS did not ensure that the design and execution of the establishment's hazard analysis and HACCP plan complied with HACCP requirements described in Circular No. V3/2018. Government inspection personnel did not ensure that (a) the HACCP plans were signed and dated by an individual of the establishment with overall authority; (b) the relevant hazards were identified and evaluated throughout the establishment's beef slaughter hazard analysis; (c) the critical control point (CCP) monitoring included documentation of the type of verification activity (records review or direct observation) performed by the establishment; (d) the HACCP plan was reassessed by the establishment at least annually or when significant changes occur; or (e) the disposition of product was included in the documented corrective actions related to deviations.

GOVERNMENT CHEMICAL RESIDUE TESTING PROGRAMS

- A chemical residue violation for zeranol in a feedlot sample led to a recall of product by an establishment certified to export to the United States. The exporting establishment failed to take required corrective actions, including reassessing the adequacy of its hazard analysis and HACCP plan or to make changes to its production process to address the chemical residue violation. DVS did not ensure adequate implementation of its test and hold procedures. No adulterated product from the violation was exported to the United States.

During the audit exit meeting, DVS officials committed to address the preliminary findings as presented. FSIS will evaluate the adequacy of the DVS' 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 an onsite audit of Namibia's food safety inspection system on July 18 – 22, 2022. The audit began with an entrance meeting on July 18, 2022, in Windhoek, Namibia, during which the FSIS auditor discussed the audit objective, scope, and methodology with representatives from the Central Competent Authority (CCA) – the Directorate of Veterinary Services (DVS). Representatives from DVS accompanied the FSIS auditor throughout the entire audit.

II. AUDIT OBJECTIVE, SCOPE, AND METHODOLOGY

This was a routine ongoing equivalence verification audit. The audit objective was to verify whether the food safety inspection system governing raw intact beef 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. Namibia is eligible to export the following categories of products to the United States:

Process Category	Product Category	Eligible Products[1]
Raw - Intact	Raw Intact Beef	Beef - All Products Eligible except Cheek Meat, Head Meat, Heart Meat, and Weasand Meat

Beef imported from Namibia is subjected to foot-and-mouth (FMD) disease requirements specified in Title 9 of the United States Code of Federal Regulations (9 CFR) 94.11 and the bovine spongiform encephalopathy (BSE) requirements specified in 9 CFR 94.18 and 9 CFR 94.19. Meat and other animal products imported to the United States from Namibia must originate from the region south of the Veterinary Cordon Fence (VCF).[2]

Prior to the onsite equivalence verification audit, FSIS reviewed and analyzed Namibia's Self-Reporting Tool (SRT) responses and supporting documentation. During the audit, the FSIS auditor conducted interviews and reviewed records to determine whether Namibia's food safety inspection system governing raw intact beef products is being implemented as documented in the country's SRT responses and supporting documentation.

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

[1] All source meat used to produce products must originate from eligible countries and establishments certified to export to the United States.
[2] https://www.aphis.usda.gov/animal_health/downloads/import/animals/namibia-vcf-map.pdf

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

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

The FSIS auditor reviewed administrative functions at DVS headquarters and at one local inspection office within a certified establishment. The FSIS auditor evaluated the implementation of controls in place to ensure the national system of inspection, verification, and enforcement is being implemented as documented by DVS in SRT responses and supporting documentation. The audit also included a visit to the only establishment certified to export to the United States, a beef slaughter establishment that produces and exports raw intact beef to the United States.

During the establishment visit, the FSIS auditor paid particular attention to the extent to which industry and government interacted to control hazards and prevent noncompliance that threatens food safety. The FSIS auditor assessed DVS' 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. Furthermore, one government microbiological and chemical residue laboratory was audited to verify its ability to provide adequate technical support to the food safety inspection system.

Competent Authority Visits	#	Locations
Central Competent Authority	1	• DVS, Windhoek
Laboratory	1	• Central Veterinary Laboratory (CVL), government microbiological and residue testing laboratory, Windhoek
Beef slaughter and processing establishment	1	• Establishment No. NA22, Meatco Windhoek, Windhoek

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 301 to the end).

The audit standards applied during the review of Namibia's inspection system for raw intact beef products included: (1) all applicable legislation originally determined by FSIS as equivalent as part of the initial review process, and (2) any subsequent equivalence determinations that have

been made by FSIS under provisions of the World Trade Organization's Agreement on the Application of Sanitary and Phytosanitary Measures.

III. BACKGROUND

From March 1, 2019, to February 28, 2022, FSIS import inspectors performed 100 percent reinspection for labeling and certification on 1,214,801 pounds of raw intact beef exported by Namibia to the United States. Of these amounts, additional types of inspection were performed on 1,050,297 pounds of raw intact beef. These additional types of inspection included physical examination, chemical residue analysis, and testing for microbiological pathogens (*Escherichia coli* (*E. coli*) O157:H7 and Shiga toxin-producing *E. coli* (STEC) serogroups O26, O45, O103, O111, O121, O145 in beef). As a result of this additional testing, 120 pounds of meat were rejected for issues not related to public health (e.g., abscess and bone fragments). Namibia has not exported raw beef products to the United States since August 5, 2020.

The previous FSIS audit in 2019 identified the following findings:

Summary of Findings from the 2019 FSIS Audit of Namibia
Component 1: Government Oversight (e.g., Organization and Administration)
• Government inspection personnel were not confirming acceptable testing results from livestock carcasses and parts subjected to routine government chemical residue testing prior to signing the export certificate. This is inconsistent with the CCA's requirements to hold product pending negative residue results, as prescribed in Circular V5/2018, Post-Mortem Livestock.
Component 6: Government Microbiological Testing Programs
• The Central Veterinary Laboratory (CVL) was not analyzing the entirety of the N60 sample for *E. coli* O157:H7 and non-O157 STEC during screening of official testing. • The CVL was not following its validated method for sample preparation and enrichment for *E. coli* O157:H7 and non-O157 STEC official testing.

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

The FSIS final audit reports for Namibia'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 auditor reviewed was Government Oversight. FSIS import regulations require the foreign food safety inspection system to be organized by the national government in such a manner as to provide ultimate control and supervision over all official inspection activities; ensure the uniform enforcement of requisite laws; provide sufficient administrative technical support; and assign competent qualified inspection personnel at establishments where products are prepared for export to the United States.

The CCA of Namibia is the DVS, a Directorate under the Ministry of Agriculture, Water and Land Reform which has the responsibility to maintain and promote animal health as well as animal production and reproduction, to ensure the safe marketing of animals and animal products, to establish animal disease control, and to conduct veterinary and epidemiological surveillance. The Animal Health Act of 2011 (the Act) provides DVS with the legal authority and responsibility to organize and administer the national inspection system and to issue or update inspection procedures through the publication of circulars. Furthermore, the Prevention of Undesirable Residues in Meat Act provides DVS the authority to regulate the presence of chemical residues on meat products.

The FSIS auditor confirmed that, since the previous FSIS audit in 2019, DVS changed its organizational structure from four divisions (the Veterinary Public Health Division; the Animal Disease Control Division; the Epidemiology, Training, Import and Export Control Division; and the Diagnostic Services and Research Division) to six divisions (the Division of Veterinary Public Health; the Division of Animal Disease Control/ South; the Division of Animal Disease Control/North; the Division of Epidemiology, Import, Export, Traceability, Medicine Control and Advisory; the Division of Diagnostic and Research Services/Central Veterinary Laboratory; and the Division of Diagnostic and Research Services/Ondangwa Laboratory). DVS is led by a chief veterinary officer (CVO) who is assisted by six deputy CVOs.

The Veterinary Public Health Division is responsible for the coordination of inspection in meat establishments and for ensuring compliance with requirements of trading partners. At the headquarters level, the Veterinary Public Health Division consists of a deputy chief veterinary officer and a chief veterinarian (CV) who oversee all official inspection staff. A State veterinarian (SV) supervises government inspection personnel (GIP) assigned to the slaughter establishment certified to export to the United States. GIP stationed at the establishment include veterinary hygiene inspectors (VHI) and veterinary hygiene inspector assistants (VHIA). The SV is responsible for implementation of policies, legal requirements, exports, and ante-mortem and post-mortem inspection as well as animal welfare.

The role of the VHI and VHIA is to monitor and check for compliance with hygiene and food safety management system requirements (e.g., pest control, sanitation, personnel hygiene, sampling for microbiological organisms, and BSE analysis), monitoring adherence to good manufacturing practices during slaughter, and supervision of deboning activities. The VHIA ensure that meat from animals is free from disease, wholesome, and poses no risk to human health by carrying out post-mortem inspection of carcasses, offal, and organs.

The FSIS auditor verified that DVS has adopted rules of practice consistent with the FSIS' requirements specified in 9 CFR 500. Circular Nos. V12/2009 (Inspection Recording and Monitoring Enforcement) and V3/2018 (USDA-FSIS Regulatory Requirements: DVS Veterinary Public Health Verification Activities of an Establishment's Food Safety System) give instructions to SVs for enforcing regulations and determining the appropriate actions when there is a noncompliance. Enforcement actions may range from a regulatory control action to a withholding action, suspension, or withdrawal of government inspection. The FSIS auditor reviewed the noncompliance records issued by GIP at the certified establishment and confirmed

that DVS requires that the establishment take action to prevent product contamination, take corrective actions when insanitary conditions or contaminated products are found, and take effective preventive measures after instances of noncompliance.

As noted earlier, the Act provides DVS with the legal authority and responsibility to verify compliance with regulatory requirements at certified establishments exporting to the United States. Circular No. V3/2018 defines adulterated product and misbranded product consistent with FSIS' definition in 9 CFR 301.2. To ensure product is not adulterated, GIP perform daily verification and oversight tasks in accordance with DVS' requirements. When regulatory requirements are not met, the CVO has the authority to stop production, notify the establishment of the noncompliance, demand immediate corrective actions and preventive measures, and issue noncompliance records.

The Act gives DVS the legal authority to certify meat products destined for export to the United States and prohibits any person from exporting animal products from Namibia without a health certificate signed by the CVO. The establishment has not exported raw intact beef products to the United States since August 2020. The FSIS auditor confirmed through document review and interviews with GIP that before certifying any product for exports to the United States, GIP review and verify that the microbiological and residue sample results associated with the shipments are acceptable, in accordance with Circular No. V3/2018. Additionally, GIP also review all inspection records, HACCP and sanitation records and ensure that all FSIS and APHIS requirements are met prior to signing the export certificate. The FSIS auditor verified that the export certificates, stamps, and seals are securely locked in a cabinet located in the government office when not in use and only the SV has the keys to open the cabinet.

The FSIS auditor verified that the establishment recently recalled raw beef product due to the detection of a chemical contaminant (zeranol) on a feedlot sample. No product associated with the violative sample was exported to the United States. The FSIS auditor reviewed the records associated with the recall and confirmed that DVS has the authority to require the recall of adulterated product in commerce. Additionally, DVS requires establishments to maintain and implement a recall plan. In the event that adulterated or misbranded products are shipped to the United States, DVS would inform FSIS of the implicated product by having the CVO contact FSIS and the U.S. Embassy in Pretoria, South Africa.

The FSIS auditor verified that the establishment certified to export to the United States does not use source materials from any other establishments or countries. Traceability of the cattle slaughtered is verified by GIP when certifying products for export to ensure compliance with APHIS requirements.

To ensure that the establishment is aware of relevant laws, regulations, and policies for exporting products to the United States, the FSIS auditor confirmed that DVS issues circulars to certified establishments describing the specific requirements that must be met for the importing market. The FSIS auditor reviewed e-mails transmitted by DVS officials to the SV and the establishment describing FSIS requirements and instructing GIP to verify that all the requirements are met before certifying products for export to the United States. Additionally, DVS monitors the FSIS website for policy changes that would warrant the issuance of a circular. When a new circular is

issued, DVS holds a training session for inspection personnel to ensure their understanding of updated policies.

The FSIS auditor reviewed and discussed with DVS officials the process of certification and de-certification of establishments intending to export to the United States as outlined in Circular No. V18/2015, Updated Veterinary Services Requirements for Approval, Registration, and Listing and Regulatory Actions/Measures Following Failures with Regulatory Compliance. An establishment that intends to export products to the United States must first submit to DVS (1) a written application describing the product it intends to export; (2) the existing plans and drawings of the facility along with all the required amenities, equipment, production rooms, HACCP plan(s), sanitation standard operating procedures (Sanitation SOP), and process control microbiological testing programs. The establishment must also conduct slaughter activities while operating under requirements for export to the United States and generate HACCP, Sanitation SOP, and sampling records. If DVS determines the documentation is acceptable and meets the requirements of the importing country, DVS conducts an onsite audit of the establishment. If the establishment is found compliant, then the audit team recommends approval of the establishment to DVS. If the establishment is found not compliant, then the audit team notes the deficiencies found during the audit and the establishment is required to address the deficiencies with corrective actions. Once corrective actions are taken, the audit team revisits the establishment to verify implementation. Once approved, DVS assigns a number to the establishment, adds it to the list of approved establishments and informs the competent authorities of the importing country in writing. DVS has the authority to suspend government inspection in an approved establishment through decertification if that establishment no longer meets the requirements of the importing country. To re-certify an establishment for export, DVS follows the same certification process described above.

The FSIS auditor verified that DVS conducts annual certification audits (risk-based audits) of the certified establishment. The FSIS auditor verified that DVS reviews the establishment's documentation, conducts an onsite audit of the establishment, and evaluates the establishment's ability to meet DVS' regulatory requirements prior to granting renewal of certification to export meat products to the United States. No concerns arose regarding DVS' implementation of this process.

Public Service Act No. 13 of 1995 stipulates that inspection personnel are official employees of the national government. Through the Ministry of Finance, the national government of Namibia pays the salaries of GIP. The FSIS auditor reviewed payroll documents from the Ministry of Finance and individual pay stubs during the audit and verified that DVS employees receive payment from the Namibian government. The Public Service Act also requires that, every year, government employees make a conflict-of-interest declaration to ensure that they only act in the public's interest.

The FSIS auditor interviewed the SV, conducted direct observations of inspection activities within the establishment and reviewed daily government inspection records. The FSIS auditor verified that DVS has provided the required GIP to conduct inspection activities, including ante-mortem inspection of all animals prior to slaughter and post-mortem inspection of every carcass, head and viscera for all operating shifts. Relief staffing schedules are maintained by supervisory

personnel for all inspection staff in the event of any planned or unplanned absences. The FSIS auditor confirmed that government inspection occurs continuously during all slaughter operations and at least once per production shift during deboning.

The FSIS auditor verified that GIP possess the appropriate educational credentials, and training to perform their inspection duties. Through a review of the hiring process of GIP, the FSIS auditor confirmed that SVs are required to hold a doctor of veterinary medicine degree and be registered with the Namibian Veterinary Counsel to qualify for their positions. VHI must hold a diploma in environmental health or equivalent discipline while VHIA must, at a minimum, have a secondary school certificate. When new GIP are hired, they are required to undergo training, which includes classroom and on-the-job training. Training consists of shadowing seasoned employees and becoming familiar with all relevant circulars. Refresher training is also held at least once per year. The FSIS auditor reviewed recent training courses provided to GIP covering sanitation performance standards (SPS), Sanitation SOP, HACCP principles, establishment and government microbiological sampling requirements, ante-mortem, and post-mortem inspection, specified risk material (SRM) removal, export certification, and documenting noncompliance.

DVS has the authority to approve and disapprove laboratories that are used to analyze official samples of products that are destined to the United States. CVL is the national government reference laboratory for the testing of official verification samples collected from products that are destined for export to the United States. CVL, which is under the authority of DVS, analyzes all government verification and certified establishment samples. The FSIS auditor verified that DVS provides administrative and technical support to CVL, which is accredited by the Southern African Development Community Accreditation Services (SADCAS) to meet requirements consistent with International Organization for Standardization (ISO)/International Electrotechnical Commission (IEC) - 17025:2005 standards. The FSIS auditor verified that the current accreditation certificate is valid from August 16, 2021, to March 19, 2023, and that the SADCAS conducts annual audits of the CVL. The FSIS auditor reviewed SADCAS's most recent audit reports and verified that audits and the scope of accreditation included methods implemented for testing of products eligible for export to United States, and when deficiencies were found, corrective actions were taken by the laboratory and subsequently verified by SADCAS.

CVL subcontracts chemical residue analysis to an Italian laboratory (the Istituto Zooprofilattico Sperimentale [IZS]) and maintains oversight over this laboratory through onsite audits every 3 years. However, the FSIS auditor verified that DVS has not audited the subcontracted laboratory at the prescribed frequency due to the COVID pandemic. The FSIS auditor reviewed a copy of the contractual agreement between CVL and IZS laboratory and confirmed that the contract outlined CVL's expectations and the obligations of IZS.

The FSIS auditor confirmed that CVL conducts proficiency testing for methods that are used to analyze official samples at least once per year. The FSIS auditor verified the frequency and concluded that the proficiency testing administered by the SADCAS includes the methods used by laboratory personnel to analyze official samples of products that are destined for the United States and found no concerns.

The FSIS auditor verified that Namibia's laboratory quality management system is based on the ISO 17025 accreditation standards and consists of a quality system, quality manual, document control, internal audit, management review, corrective and preventive actions, personnel, equipment, reagents, reference materials and supplies, test method, sample testing, measurement traceability, data management, and instrumentation. The laboratory personnel apply the quality manual to ensure accuracy and consistency in conducting test methods.

The FSIS auditor observed chemical residue sample receipt at CVL and confirmed that laboratory personnel were following the laboratory's sample receiving and handling procedures that maintained the traceability of the sample back to the source beef products and producers through the internal Laboratory Information Management System and the Namibian Livestock Identification and Traceability System (NamLITS) databases. The FSIS auditor confirmed that the samples are either refrigerated or frozen until they are delivered to the laboratory. The FSIS auditor reviewed the sample submission form that accompanies residue samples and confirmed that the form includes the animal owner's details, farm name and number, herd ID number, veterinary district, the animal sex and age, tag number. The FSIS auditor verified that sample integrity and proper chain of custody are maintained, in accordance with DVS' requirements.

The FSIS auditor confirmed that DVS receives laboratory results for official government chemical residue testing directly from the CVL in a timely manner, assesses the data, and takes actions in accordance with the procedures described in their official government chemical residue control program.

The FSIS auditor verified the implementation of corrective actions related to the systemic finding identified during the 2019 FSIS audit of Namibia. The finding was regarding inadequate sample receipt and handling and the FSIS auditor confirmed that CVL personnel were following the required sample receipt and handling procedures specified in CVL's receiving and handling procedural document (QUA SOP 17).

The FSIS auditor verified that Namibia continues to organize, administer, and enforce its food safety inspection system for raw intact beef products in a manner that meets the core requirements of 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 auditor reviewed was Government Statutory Authority and Food Safety and Other Consumer Protection Regulations. The system is to provide for humane handling and slaughter of livestock; ante-mortem inspection of 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 FSIS auditor confirmed that, when conducting the humane handling task, SVs verify truck unloading, water, and feed availability, handling of suspect and disabled livestock, handling during livestock movement, electric prod/alternative object use, observations for slips and falls, stunning effectiveness, and checks for conscious animals on the rail. The FSIS auditor observed GIP conduct humane handling on cattle being slaughtered and confirmed that they conduct verification of humane handling practices in accordance with DVS' requirements in Circular No. V3/2018. Additionally, the FSIS auditor reviewed the inspection-generated humane handling verification records documenting the results of their verification activities. The FSIS auditor did not identify any areas of concern during the review of records and direct observations.

Ante-mortem inspection requirements are described in Circular No. V4/2018, USDA-FSIS Regulatory Requirements-Humane Handling and Slaughter of Livestock Verification Compliance by DVS Veterinary Public Health Inspectors, which implements requirements that are consistent with 9 CFR 313. The FSIS auditor verified that the VHI, with the support of VHIA, were conducting ante-mortem inspection daily, within 24 hours of the animals arriving at the slaughterhouse and less than 24 hours before slaughter, as required by Circular No. V9/2009, USDA-FSIS Requirements for the Disposition of Non-Ambulatory Disabled Livestock Presented for Slaughter.

The FSIS auditor verified that ante-mortem inspection is performed on all livestock at rest and in motion to determine whether animals are fit for slaughter, and the SV identifies and segregates livestock with disease conditions. The FSIS auditor verified that the establishment certified to export to the United States maintained a suspect pen for the purpose of segregating suspect animals. The SV reviews documentation (a movement permit, a certificate of vehicle cleaning and disinfection, a departure registry with either an electronic or visual ear tag number or both, and an anthrax and lumpy skin disease free declaration) associated with incoming animals to verify that they are properly identified and that they originate only from Namibia, from areas that are located south of the VCF, as per APHIS requirements. The DVS also maintains an electronic system, NamLITS, which documents the traceability of animals through their radio-frequency identification tags to ensure that they do not originate from FMD-affected areas. The FSIS auditor reviewed records associated with ante-mortem inspection and verified that the VHI were conducting ante-mortem procedures in compliance with Namibia's requirements.

The FSIS auditor confirmed through discussions with GIP and direct observation that after conducting ante-mortem inspection on the animals, GIP may make one of the following dispositions: a) passed fit for slaughter, b) passed for slaughter subject to a second ante-mortem inspection; c) passed for slaughter under special conditions; or d) condemned for public health reasons consistent with 9 CFR 309.2.

DVS has provided instructions describing disease conditions warranting condemnation of animals at ante-mortem inspection. The VHI identify and condemn any animal that shows signs of central nervous system disorders, including non-ambulatory cattle during the ante-mortem inspection. In addition, DVS mandates that VHI collect required tissue samples from any animal with signs of neurological disorders, document their ante-mortem observations on suspect animals, and dispose of the entire carcass of these animals. The FSIS auditor reviewed inspection records and observed execution of ante-mortem procedures that demonstrate proper

implementation of DVS' requirements. No concerns arose as a result of these reviews and direct observations.

Circular No. V3/2020, Post-mortem Livestock Inspection, details procedures for post-mortem inspection by SVs for every carcass, line speeds, staffing, handling of carcasses and parts throughout slaughter that are contaminated and/or diseased, and handling of carcasses sampled for pathological conditions, residues, or BSE.

Through observation of VHI and VHIA and through a review of post-mortem inspection records, the FSIS auditor verified that post-mortem inspection procedures were conducted in accordance with Circular No. V3/2020. The FSIS auditor observed the performance of VHIA examining the heads, viscera, and carcasses and confirmed that they were using proper incision, observation, and palpation of required organs and lymph nodes, in accordance with the DVS' requirements. The FSIS auditor observed and verified that proper presentation, identification, examination, and disposition of carcasses and parts are being implemented during post-mortem inspection. VHIA were inspecting heads, viscera, and carcasses for contamination with fecal material, ingesta, or milk contamination. The establishment has a mechanism in place to divert carcasses from the slaughter line for further disposition if pathology or the need for trimming is identified. The FSIS auditor verified that line synchronization of carcasses, heads, and viscera was properly maintained, with the same number affixed to the carcass and the accompanying head and viscera.

Circular No. V14/2013, Standard Operating Procedures for Veterinarian Activities Pertaining to Specified Risk Material (SRM) Removal, Segregation, and Disposition, provides instructions to SVs on how to verify that establishments slaughtering cattle are complying with the requirements to remove, segregate, and dispose of SRMs. DVS defines SRMs as the skull, brain, eyes, trigeminal ganglia, and spinal cord of animals aged over 30 months. This includes the vertebral column (excluding the vertebrae of the tail), the spinous and transverse processes of the cervical, thoracic, and lumbar vertebrae, and the median sacral crest and wings of the sacrum (including the dorsal root ganglia) of animals aged over 30 months. It also includes the tonsils, intestines from the duodenum to the rectum, and the mesentery of animals of all ages.

The FSIS auditor reviewed inspection verification records and the establishment's monitoring records concerning control and disposal of SRMs and confirmed that GIP were verifying removal of SRMs in accordance with DVS' requirements. The auditor also observed that the establishment uses dedicated equipment for removal of SRMs and ensures the safeguarding of inedible materials. Condemned materials are disposed of in designated containers that are clearly marked as "inedible." The FSIS auditor confirmed that verification of handling of condemned animals and parts and inedible products by the SV or a VHI is conducted daily. No issues were observed regarding the implementation of SRM controls at the establishment.

The FSIS auditor verified that DVS conducts supervisory reviews twice a year, in accordance with Circular No. V7/2018, In-Plant Performance System Assessment Sheet (Assessment of Official Controls), to ensure FSIS' import requirements are met. The FSIS auditor confirmed through interviews and record reviews that a CV from DVS headquarters conducts supervisory review on the SV; the SV assesses the performance of both the VHI and VHIA. The FSIS auditor verified that during the supervisory visits, GIP are evaluated on humane handling, ante-mortem,

and post-mortem inspection; microbiological and residue sample collection, verification of humane handling, SRM controls, condemned materials, HACCP, Sanitation SOP, export certification, assessment of animal disease and food safety impacts; food security procedures; controls over condemned materials; and SPS. In addition, the FSIS auditor confirmed that a CV from DVS headquarters conducts annual risk-based audits of export establishments and verifies compliance with requirements for export to the United States. The FSIS auditor reviewed the report of the most recent audit report and verified that corrective actions were taken when deficiencies were identified.

DVS requires the establishment to segregate and store inedible products in a separate area from edible products. In addition, containers used for collecting inedible products were conspicuously marked and distinguished from other containers. The FSIS auditor noted that GIP have the authority and responsibility to ensure inedible products are denatured and disposed of in accordance with DVS' regulatory requirements. While the establishment is not currently exporting any product to the United States, the FSIS auditor discussed with GIP the separation by time or space requirement regarding products destined for export to the United States and other products and confirmed that a specially dedicated space labeled "U.S.A. Exports" was reserved in one of the coolers. The FSIS auditor found no concern regarding the complete separation of meat products deemed eligible for export certification from meat products not eligible for export certification.

Circular No. V8/2018, USDA-FSIS Regulatory Requirements: Labelling of Meat Products Exported to the US Market, provides instructions for SV to verify that meat products intended for export to the United States meet FSIS' labeling requirements described in 9 CFR 317.2, 317.8, and 317.300-400. The FSIS auditor confirmed through discussion that before certifying any export to the United States, the SV or VHI ensured that all FSIS labeling requirements are met.

The FSIS auditor concluded that DVS has the legal authority, a regulatory framework, and adequate verification procedures to ensure sufficient regulatory control using statutory authority consistent with criteria established for this component.

VI. COMPONENT THREE: GOVERNMENT SANITATION

The third equivalence component the FSIS auditor reviewed was Government Sanitation. The FSIS auditor verified that the CCA requires each official establishment to develop, implement, and maintain written Sanitation SOP to prevent direct product contamination or insanitary conditions, and to maintain requirements for SPS and sanitary dressing.

Circular No. V3/2018 outlines procedures mandating that export establishments operate in a sanitary manner. The procedures include sanitation standard operating procedures, sanitary performance standards, food safety based on HACCP principles, documentation of non-compliances and enforcement action which includes suspension or withdrawal of inspection, for those establishments that fail to prevent meat product contamination, operate under insanitary conditions, or fail to take corrective actions. The Circular No. V3/2018 also provides instructions to GIP regarding the verification of the adequate implementation of Sanitation SOP and SPS requirements through records review and direct observation verifications.

The FSIS auditor verified that VHI conduct sanitary dressing verification daily in accordance with Circular No. V16/2013, Verifying Sanitary Dressing and Process Control Procedures by Off-Line DVS Inspection Personnel (VHI) in Slaughter Operations of Cattle of Any Age. VHI observe sanitary dressing procedures daily at multiple points in the slaughter process where contamination is likely to occur. Circular No. V17/2007, FSIS Regulatory Requirements on Verification Procedures for Controlling Fecal Material, Ingesta, and Milk in Slaughter Operations, provides VHI with instructions for verifying zero-tolerance standards. The FSIS auditor observed GIP conduct a zero-tolerance verification task on a carcass and confirmed that GIP were thoroughly examining the entire carcass to ensure the absence of fecal material, milk, or ingesta.

The FSIS auditor verified that VHI conduct a review of SPS on a daily basis, by observing areas of the establishment and through a records review. VHI monitor the establishment for condensation control, chemical use and storage, employee hygiene, water potability, pest control, outside premises, and lighting. The FSIS auditor verified that this was conducted daily, as prescribed in Circular No. V3/2018 which provides guidelines consistent with 9 CFR Part 416 requirements.

The FSIS auditor observed a VHI performing pre-operational and operational Sanitation SOP verification at the establishment certified to export to the United States. VHI conduct pre-operational and operational sanitation verification daily, consisting of both direct observation and a records review and document their results on their daily verification records. When deficiencies are identified, the VHI have the authority to restrict an area from operating and to require immediate corrective actions when deficiencies are identified involving direct product contamination or product contact surfaces. The FSIS auditor identified the following finding related to Sanitation SOP program and records:

- DVS did not ensure government inspection personnel were following requirements for verification of Sanitation SOP procedures as described in Circular No. V3/2018. Government inspection personnel did not ensure that (a) the establishment's Sanitation SOP program was signed and dated by an establishment employee with overall authority; (b) the establishment's Sanitation SOP program specified the frequency at which operational sanitation procedures are to be conducted, or (c) the establishment quality assurance personnel were documenting the daily operational sanitation procedures and frequency on the Sanitation SOP monitoring records.

Except for the above findings and the isolated observations documented in establishment checklist provided in Appendix A of this report, the FSIS auditor confirmed that Namibia's meat inspection system continues to meet the core requirement of this component.

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

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

Circular Nos. V20/2008 and V3/2018 require that establishments certified to export to the United States to design, implement, and maintain HACCP systems including a flow diagram, hazard analysis, HACCP plan for hazards identified as likely to occur, intended use of product, monitoring and verification activities, corrective actions, reassessment, and records supporting the implementation of the HACCP system. In addition, the establishment's documents must support the decisions made in the hazard analysis and HACCP plan, including the validation of the HACCP system.

The FSIS auditor confirmed that the certified establishment complied with requirements consistent with of 9 CFR 417. GIP were verifying daily through review and observation as well as recordkeeping that the establishment's HACCP system complied with the seven principles of HACCP. The FSIS auditor also ascertained that the establishment is required to establish a zero-tolerance critical control point (CCP) for fecal, ingesta, or milk contamination, and address STEC in its hazard analysis.

The FSIS auditor verified that GIP were following the verification methodology for protecting public health described in Circular No. V17/2007 to ensure that no visible fecal material, milk, or ingesta was present at or immediately after the final rail and before final wash. Reference Guide to Establishment and Inspector Daily Responsibilities (Pre-requisite Programs/SPS, Sanitations, Food Safety) outlines the individual HACCP monitoring verification activities and corresponding frequencies for the establishment and GIP.

In the event of a HACCP noncompliance, Circular Nos. V20/2008 and V12/2009 provide GIP with the authority to issue a noncompliance record or take stronger regulatory enforcement, such as a regulatory control action, a withholding action, or suspension of government inspection, when necessary. The FSIS auditor reviewed the HACCP-related noncompliance records and confirmed that DVS has not taken any enforcement action against the establishment since the last audit in 2019.

The FSIS auditor confirmed that GIP verify establishment personnel review records associated with the production of products destined for export to ensure all HACCP requirements are met prior to shipping. During the record review of the audited establishment's HACCP system, the FSIS auditor found numerous HACCP non-compliances and identified the following findings:

- DVS did not ensure that the design and execution of the establishment's hazard analysis and HACCP plan complied with HACCP requirements described in Circular No. V3/2018. Government inspection personnel did not ensure that (a) the HACCP plans were signed and dated by an individual of the establishment with overall authority; (b) the relevant hazards were identified and evaluated throughout the establishment's beef slaughter hazard analysis; (c) the CCP monitoring included documentation of the type of verification activity (records review or direct observation) performed by the establishment; (d) the HACCP plan was reassessed by the establishment at least annually or when significant changes occur; or (e) the disposition of product is included in the documented corrective actions related to deviations.

Although DVS requires establishments that intend to export raw intact beef products to the United States develop, implement, and maintain a HACCP system, the numerous HACCP design and implementation non-compliances found at the audited establishment demonstrate a need for DVS to strengthen its oversight regarding the verification by GIP of HACCP regulatory requirements.

VIII. COMPONENT FIVE: GOVERNMENT CHEMICAL RESIDUE TESTING PROGRAMS

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

The FSIS auditor verified that DVS maintains the legislative authority for and implements a national residue control program (NRCP) at export establishments, feedlots, and livestock farms, in accordance with the Prevention of Undesirable Residues in Meat Act. This Act provides for control over the administration of certain products to animals which may cause undesirable residue in meat and meat products. To implement the NRCP, DVS issues circulars. Circular No. V48/1990 monitors the misuse of chemical residues by distributors of veterinary medicine, private practitioners, areas of environmental pollution, feedlots, and livestock producers. Circular No. V10/2014 provides guidance to all GIP when suspected cases of repeat violations have been reported by CVL or the export abattoirs.

The FSIS auditor verified that CVL develops a residue monitoring plan annually that is consistent with European Union (EU) 2017/625 requirements. The plan is made available to the SV assigned to the establishment along with the required guidance described in the Procedure for Sample Collection under the Veterinary Drug Residue Monitoring Program. The residue sampling plan includes the classes of compounds tested, the class of animal, the type of sample collected (e.g., urine, kidney fat, liver, or muscle), the number of samples per sampling event and the total number of samples. The FSIS auditor verified through document review that GIP were following the sampling plan as required. In addition, if the SV identifies animals suspected of residues on ante-mortem inspection, those animals are segregated, slaughtered last, and sampled for residues once slaughtered. VHIA may also identify carcasses upon post-mortem inspection that warrant targeted residue sampling, which are then retained and sampled.

The FSIS auditor discussed with CVL officials and GIP the content of Circular No. V3/2020, which requires that carcasses and parts subjected to chemical residue sampling be held until acceptable result is obtained. While the SV at the establishment is responsible for ensuring that the test and hold policy is adhered to, the FSIS auditor identified the following finding:

- A chemical residue violation for zeranol in a feedlot sample led to a recall of product by an establishment certified to export to the United States. The exporting establishment failed to take required corrective actions, including reassessing the adequacy of its hazard

analysis and HACCP plan or to make changes to its production process to address the chemical residue violation. DVS did not ensure adequate implementation of its test and hold procedures. No adulterated product from the violation was exported to the United States.

The FSIS auditor also verified that when a violative chemical residue is suspected, the information about the suspicion and the intent to investigate the matter is communicated to the producer within 3 business days. The producer's animal movement is also restricted in the NamLITS system and if the violation is confirmed, the tested carcass is excluded from certification for export to the United States, in accordance with the requirements in Circular Nos. V10/2014 and V3/2020.

Except for the above finding, the FSIS auditor's analysis and onsite audit verification indicates that DVS continues to maintain the legal authority to regulate, plan, and execute activities of the inspection system that are aimed at preventing and controlling the presence of chemical residues in raw intact beef products intended for export to the United States.

IX. COMPONENT SIX: GOVERNMENT MICROBIOLOGICAL TESTING PROGRAMS

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

To ensure continual process control, DVS has issued Circular No. V18/2007, USDA-FSIS Regulatory Requirements: Contamination with Microorganisms; Process Control Verification and Testing; Pathogen Reduction Standards, requiring generic *E. coli* testing procedures that are consistent with 9 CFR Part 310.25 and verified by the VHI at the certified establishment. Circular No. V18/2007 requires that the establishment develop generic *E. coli* sampling procedures that include sample selection; sample preparation; sampling procedures; shipping procedures; sample integrity requirements; result analysis and recordkeeping; process verification and corrective action procedures for inconclusive results, non-compliances, and loss of process control.

The FSIS auditor observed generic *E. coli* sampling by the establishment and verified that VHI were observing sample collection and reviewing the establishment's test results for generic *E. coli* sampling. VHI are verifying that generic *E. coli* testing is performed at the required frequency of one test per 300 carcasses and that the establishment is using statistical process control to determine the lower control limit, upper control limit, and marginal range for generic *E. coli* results according to their historical data. The FSIS auditor reviewed GIP's verification records for generic *E. coli* and found no concern.

The FSIS auditor confirmed that DVS implements a national microbiological sampling program to monitor *Salmonella* prevalence for raw beef destined for export to the United States. In that regard, DVS has issued Circular No. V19/2008 USDA-FSIS Regulatory Requirements: Pathogen

Reduction Performance Standards in Red Meat Establishments: *Salmonella* spp. The requirements specified in Circular No. V19/2008 are consistent with 9 CFR 310.25(b).

The FSIS auditor confirmed that GIP are collecting sets of 82 samples on steers and heifers with a maximum of one positive sample allowed to achieve the standard as well as sets of 58 samples on bulls and cows with a maximum of one positive sample allowed to meet the standard. Should the establishment fail the first set, GIP start a second set. A third set is initiated if the establishment fails the second set. DVS suspends government inspection if the establishment fails a third set. To collect a carcass sample for *Salmonella* analysis, GIP swab the rump, flank, and brisket of a randomly selected chilled carcass. The SV evaluates results to verify process control and ensure that corrective actions are taken by the establishment when performance criteria are not met. Negative test results are required by the DVS prior to shipping product to the United States. The FSIS auditor reviewed the records documenting sample collection and results.

The FSIS auditor verified that CVL is using BAX BIO SOP 03 for *Salmonella* screening, and BAX Polymerase Chain Reaction (PCR) FHG SOP 04 for *Salmonella* confirmation, which are consistent with the procedures described in ISO 6579, Microbiology of the Food Chain – Horizontal Method for the Detection, Enumeration and Serotyping of *Salmonella* method.

DVS' official microbiological sampling and testing program for STECs is outlined in Circular No. V24/2015: Namibia's Verification Sampling and Testing Program for Shiga Toxin producing *Escherichia coli* (*E. coli* O157:H7 and non-O157 STECs). DVS requires that establishments certified to export to the United States implement a sampling program for STEC (*E. coli* O157:H7, O26, O45, O103, O111, O121, and O145) using N60 trim sampling methodology for each lot of products intended for export. GIP collect STEC official verification samples once per week. In addition, the FSIS auditor verified that the establishment has procedures in place to hold the product pending acceptable test results, from both official government verification and establishment testing for STEC, in accordance with DVS' requirements. DVS considers STEC an adulterant in raw beef.

The FSIS auditor verified that CVL considers a screen positive result as the final result for beef trim tested for *E. coli* O157:H7 using BIO SOP 32 BAX *E. coli* O157:H7 Detection for United States Market. For non-O157 STEC, CVL performs a screen using BIO SOP 15 BAX *E. coli* non-O157 Screening and Typing and confirms screen positive results following FHG SOP 20, Isolation on Non-O157 Shiga toxin Producing *E. coli* (STEC), to confirm the presence of non-O157 STEC.

The FSIS auditor verified that the SV receives laboratory results for *E. coli* O157:H7 and non-O157 STEC testing in raw beef products directly from the laboratory in a timely manner, assesses the results, and ensures proper disposition of product. The DVS headquarters reviews these test results and provides oversight during the semi-annual supervisory reviews.

The FSIS auditor verified that Namibia's food safety inspection system maintains the legal authority to regulate, plan, and execute activities of the inspection system aimed at controlling the presence of microbiological pathogens in raw beef products to be exported to the United

States, and that those beef products are unadulterated, safe, and wholesome. The inspection system meets the core requirements of this component.

X. CONCLUSIONS AND NEXT STEPS

An exit meeting was held July 22, 2022 in Windhoek, Namibia, with DVS officials. At this meeting, the FSIS auditor 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 auditor identified the following findings:

GOVERNMENT SANITATION

- DVS did not ensure government inspection personnel were following requirements for verification of Sanitation SOP as described in Circular No. V3/2018. Government inspection personnel did not ensure that (a) the establishment's Sanitation SOP program was signed and dated by an establishment employee with overall authority; (b) the establishment's Sanitation SOP program specified the frequency at which operational sanitation procedures are to be conducted, or (c) the establishment quality assurance personnel were documenting the daily operational sanitation procedures and frequency on the Sanitation SOP monitoring records.

GOVERNMENT HACCP SYSTEM

- DVS did not ensure that the design and execution of the establishment's hazard analysis and HACCP plan complied with HACCP requirements described in Circular No. V3/2018. Government inspection personnel did not ensure that (a) the HACCP plans were signed and dated by an individual of the establishment with overall authority; (b) the relevant hazards were identified and evaluated throughout the establishment's beef slaughter hazard analysis; (c) the CCP monitoring included documentation of the type of verification activity (records review or direct observation) performed by the establishment; (d) the HACCP plan was reassessed by the establishment at least annually or when significant changes occur; or (e) the disposition of product is included in the documented corrective actions related to deviations.

GOVERNMENT CHEMICAL RESIDUE TESTING PROGRAMS

- A chemical residue violation for zeranol in a feedlot sample led to a recall of product by an establishment certified to export to the United States. The exporting establishment failed to take required corrective actions, including reassessing the adequacy of its hazard analysis and HACCP plan or to make changes to its production process to address the chemical residue violation. DVS did not ensure adequate implementation of its test and hold procedures. No adulterated product from the violation was exported to the United States.

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

APPENDICES

Appendix A: Individual Foreign Establishment Audit Checklists

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Meatco Windhoek Sheffield Rd. PO Box 2166 Windhoek, Namibia	07/20/2022	NA22	Namibia
	5. AUDIT STAFF OIEA International Audit Staff (IAS)		6. TYPE OF AUDIT X ON-SITE AUDIT ☐ DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	x
8. Records documenting implementation.	x
9. Signed and dated SSOP, by on-site or overall authority.	x
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	x
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	x
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	x
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	x
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

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

Establishment Operations:	Beef slaughter and processing.
Prepared Products:	Primals, subprimals, beef manufacturing trimmings

60. Observation of the Establishment

7*: Written SSOP*

- The SSOP program did not include the frequency of operational sanitation activities.

8. Records Documenting SSOP Implementation

- Establishment personnel were not documenting operational sanitation activities as required by DVS.

9. SSOP Signing and Dating

- The SSOP program was not signed and dated by an individual with overall authority

15. HACCP Content: List of food safety hazards

- The slaughter hazard analysis did not list and address all relevant hazards.

17. Signing and Dating of HACCP Plan

- The HACCP plan was not signed and dated by an individual with overall authority

19. Verification of HACCP Monitoring

- The HACCP verification records did not indicate the verification activity performed by verifier.

21. Reassessment of adequacy of HACCP Plan.

- Establishment personnel did not reassess the adequacy of slaughter HACCP plan after a violative zeranol residue sample collected at the feedlot led to a recall.

55. Post-mortem Inspection

- Establishment employee was not covering the entire carcass when apply lactic acid to carcass.

61. AUDIT STAFF	62. DATE OF ESTABLISHMENT AUDIT
OIEA International Audit Staff (IAS)	07/20/2022

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

REPUBLIC OF NAMIBIA

MINISTRY OF AGRICULTURE, WATER AND LAND REFORM

Tel: (264) 61 2087512
Fax: (264) 61 2087779
Enquiries: Dr. Albertina Shilongo
Email: Albertina.Shilongo@mawlr.gov.na
Reference: V 11/3/2/1

Directorate of Veterinary Services
Private Bag 12022
Ausspannplatz
WINDHOEK

23 January 2023

Michelle Catlin
International Coordination Executive
Office of International Coordination
US Department of Agriculture Food Safety and Inspection Service
Room 3143 South Building
1400 Independence Ave SW
Washington D.C. 20250-3700
E-mail: InternationalCoordination@fsis.usda.gov

Dear Michelle Catlin,

SUBJECT: NAMIBIA RESPONSE AND ACTION PLAN TO THE DRAFT FINAL REPORT ON AUDIT FINDINGS OF ONSITE VERIFICATION AUDIT OF NAMIBIA'S MEAT INSPECTION SYSTEM JULY 18-22, 2022

The Directorate of Veterinary Services in the Ministry of Agriculture, Water and Land Reform presents its compliments to you and your staff in the New Year.

Kindly find enclosed the action plan outlining the corrective actions addressing audit findings during the onsite verification audit of Namibia's meat inspection system conducted July 18-22, 2022.

Sincerely,

MINISTRY OF AGRICULTURE, WATER & LAND REFORM
Directorate of Veterinary Services
Chief Veterinary Officer
25 JAN 2023
PRIVATE BAG 12022, WINDHOEK

Albertina Shilongo (Dr)
CHIEF VETERINARY OFFICER

ACTION PLAN OUTLINING THE CORRECTIVE ACTIONS FOR FSIS AUDIT FINDINGS DURING THE ONSITE VERIFICATION AUDIT OF NAMIBIA'S MEAT INSPECTION SYSTEM CONDUCTED FROM 18-22 JULY, 2022

Equivalence component	Audit Findings	Action required	Progress	Responsible person(s)
Government oversight				
GOVERNMENT SANITATION	DVS, the Central Competent Authority in Namibia did not ensure government inspection personnel were following requirements for verification of sanitation standard operating procedures (Sanitation SOP) as described in circular V3/2018. Government inspection personnel did not ensure that: a) The establishment's sanitation SOP program was signed and dated by an establishment employee with overall authority. b) The establishment s sanitation SOP program specified the frequency at which the Operational Sanitation procedures are to be conducted c) The establishment quality assurance personnel were documenting the daily Operational sanitation procedures and frequency on the sanitation SOP monitoring records.	The CCA in Namibia have verified that the inspection personnel are following the requirements for verification of sanitation as described in Circular V3/2018. (a) The establishment's Sanitation SOP program is signed and dated by a higher level official of the establishment. (b) The establishment's Sanitation SOP program includes the frequency at which the operational sanitation is conducted. (c) The establishment quality assurance personal are documenting the daily Operational Sanitation procedures and frequency on the Sanitation SOP monitoring records.	CCA will continue to monitor government IPP to ensure continuous compliance. Establishment has provided a signed SSOP and associated documentation in line with Circular V3/2018.	Dr H.Kotokeni , Dr S. Shilongo and Mrs L. Kamati
GOVERNMENT HAZARD ANALYSIS AND CRITICAL CONTROL POINT(HACCP)SYST	DVS did not ensure that the design and execution of the establishment's hazard analysis and HACCP plan complied with HACCP requirements describe in circular V3/2018.	The CCA verified that the establishment HACCP plan and Hazard analysis were amended and complied with requirements of circular V3/2018. a) The establishment's HACCP Plan is signed and		Dr H.Kotokeni , Dr S. Shilongo and Mrs L. Kamati

EM	Government inspection personnel did not ensure: a) The HACCP plan were signed and dated by an individual of the establishment with overall authority. b) The relevant hazards were identified and evaluated throughout the establishment s beef slaughter hazard analysis. c) The CCP monitoring include documentation of the type of verification activities (record review, direct observation performed by the establishment. d) The HACCP plan was reassessed by the establishment at least annually or when significant changes occur or e) The disposition of product was included in the documented corrective actions related to deviation.	dated by a higher level official of the establishment. b) IPP ensured that the relevant hazards are identified, evaluated and included in the establishment's beef slaughter hazard analysis. c) IPP verified and ensured the establishment monitoring activities include documentation of the type of verification activities performed (record review, direct observation). d) IPP verified and ensured that the establishment assessed the HACCP plan annually or when significant changes occur. e) IPP will ensure that the disposition of product is included in the documented corrective actions related to the deviation.	CCA will continue to monitor government IPP to assert compliance. Establishment has provided a signed HACCP plan in line with Circular V3/2018	
Government Chemical residues testing programs	DVS did not ensure adequate implementation of its test and hold procedures	There is an enhancement on the Namibia Livestock Identification System where all animals that are sampled will be flagged. If there is chemical residue violation the establishment will be required to take appropriate corrective action including reassessing the adequacy of their hazard analysis and HACCP plan	Done and verified by DVS	Dr H.Kotokeni , Dr S. Shilongo and Mrs L. Kamati
Audit Findings (Establishment No. 22)				

Component	Audit findings	Action required	Progress	Responsible Person(s)
Written SSOP	The SSOP program did not include the frequency of operational sanitation activities	The establishment has review its SSOP to include the frequency of operational sanitation activities	Completed. See attached establishment document 050-QS-PR	Ms K.Shapwa – Compliance and Laboratory Manager
Records documenting SSOP implementation	Establishment personnel were not documenting operational sanitation activities as required by DVS.	The establishment has amended their SSOP forms in order to enable establishment personnel to document daily operational sanitation activities done as per the requirement.	Completed. See attached establishment document WHK-FM-QAANIM0007 & WHK-FM-QADEB0001	Ms. K. Shapwa
SSOP Signing and Dating	The SSOP program was not signed and dated by an individual with overall authority	The SSOP program has been signed and dated by the establishment's senior manager.	Completed. See attached establishment document 050-QS-PR	A. Maseke - Executive: Markets and Compliance
HACCP Content: List of food safety hazards	The slaughter hazard analysis did not list and address all relevant hazards.	The establishment has updated its Hazard analysis to include all relevant hazards.	Completed. HACCP-00010 (WHKF)	
Signing and Dating of HACCP Plan	The HACCP plan was not signed and dated by an individual with overall authority	HACCP plan has been signed by HACCP team members including by a senior manager at the establishment	Completed. See attached establishment document HACCP-00010 (WHKF), 0116-QS-FM, HACCP 00007 & HACCP 00008.	A. Maseke - Executive: Markets and Compliance
Verification of HACCP Monitoring	The HACCP verification records did not indicate the verification activity performed by verifier	The establishment's HACCP verification records form has been amended to include the verification activity performed by the verifier.	Completed. See attached establishment document WI-QADEB017, 0069-QS-FM	Ms K. Shapwa
Reassessment of adequacy of HACCP Plan	Establishment personnel did not reassess the adequacy of slaughter HACCP plan after a violative zeranol	The establishment has reassessed its HACCP plan to include Undesirable residue detected.	Completed. See attached establishment	Ms K. Shapwa

	residue sample collected at the feedlot led to a recall.		document: HACCP-00010 (WHKF), HACCP-00009(WHKF),156-QS-PR	
Post-mortem Inspection	Establishment employee was not covering the entire carcass when applying lactic acid to carcass.	Training of two operators has been completed to ensure effective application of Lactic acid as per SOP is achieved.	Completed and verified by DVS See attached establishment document 0069-QS-FM , WHK-WI-PRCAT062	Mr L. Karumendu-Slaughter floor manager Ms K. Shapwa