



United States
Department of
Agriculture

Food Safety
and Inspection
Service

Washington, D.C.
20250

SEP 10 2002

Mr. Nigel Gibbens
Head, International Animal Health Division
Department for Environment Food & Rural Affairs (DEFRA)
Room 403c
1A Page Street
London
SW1P 4PQ

Dear Mr. Gibbens:

Enclosed is a copy of the Final report of the Food Safety and Inspection Service (FSIS) February 11-19, 2002, audit of Great Britain's meat inspection system. We received your July 26, 2002, letter providing comments on the Draft Final report of the same audit and incorporated this letter into the Final report as Attachment "G."

We appreciate the corrective actions taken by the establishments and the oversight measures taken by DEFRA and the Food Standards Agency to ensure that meat products exported from Great Britain meet U.S. import requirements. In addition, your immediate attention to the sanitation and other deficiencies identified by the FSIS auditors in Establishment 2060 satisfies our standards that corrective and preventive actions were taken within thirty days. Accordingly, FSIS recognizes that Establishment 2060 is eligible to produce pork products for export to the United States.

Regarding United Kingdom's (UK) position not to test for arsenic, FSIS acknowledges that arsenic is not included in UK's 2002 national residue testing plan and therefore is not considered a deficiency by FSIS. We apologize for this misunderstanding and concur with UK's decision to review its position regarding the testing of arsenic as warranted.

If you have any questions regarding the FSIS audit or any matter discussed in this letter, please contact me at telephone number 202-720-3781 or facsimile number 202-720-7990. You may also contact me at my email address (sally.stratmoen@fsis.usda.gov).

Sincerely,

A handwritten signature in black ink that reads "Sally Stratmoen". The signature is written in a cursive, flowing style.

Sally Stratmoen, Chief
Equivalence Section
International Policy Staff
Office of Policy, Program Development
and Evaluation

Enclosure

cc:

Peter Kurz, Minister-Counselor, U.S. Embassy, London
James Hughes, Agriculture Attaché, British Embassy, Wash DC
Joerg Niederberger, Agric./Consumer Affairs, EU Mission to the U.S., Wash DC
Norval Francis, Minister-Counselor, US Mission to the EU in Brussels
John Wilson, FAS Area Officer
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Amy Winton, State Department
Country File-United Kingdom (FY 2002 Audit-Final Report)



AUDIT REPORT FOR ENGLAND

FEBRUARY 11 THROUGH FEBRUARY 19, 2002

INTRODUCTION

Background

This report reflects information that was obtained during an audit of England's meat/poultry inspection system from February 11 through February 19, 2002. All three establishments certified to export meat to the United States were audited. One of these was a slaughter establishment, one a cutting establishment, and one was a cold storage.

The last audit of the England meat inspection system was conducted in May 2000. Five establishments were audited. The auditor found significant problems in one establishment (Est. 2060) that was then designated as marginal/re-review at the next audit. The major concerns at that time were the following:

1. Inadequate prevention of contamination (Ests. 20, 2060, and 2134).
Contamination prevention was again not adequate in Ests.2060 and 2134.
2. Inadequate hand-washing facilities (Ests. 2060 and 2134). *This deficiency was adequately addressed and corrected by both establishments.*
3. Inadequate light at inspection stations (Est. 2060). *This problem was properly addressed and corrected.*
4. Neglected maintenance and cleaning of over product equipment (Est. 2060). *The establishment management corrected this deficiency.*
5. Swine were not observed from both sides in motion during ante-mortem inspection (Est. 2060). *This deficiency was still observed and discussed with Meat Hygiene Service (MHS) officials and will be addressed and corrected in the near future.*
6. The issue of the 28-day turnaround time for routine residue analyses was referred to the Office of Policy, Program Development, and Evaluation for equivalence determination and equivalence was granted.
7. The requirement for supervisory visits to all establishments certified as eligible to export to the U.S. was discussed in detail. *This was properly performed by the*

MHS representatives, when exporting to the U.S. England was presently not an active exporter to the U.S., because of Foot and Mouth Disease restriction.

Among the deficiencies identified during this new audit were the following:

1. Pre-operational sanitation deficiencies,
2. Ante-mortem and post-mortem inspection deficiencies, and
3. Trimming deficiencies of grease-contaminated meat

Importation of beef or beef products was not allowed at the time of this audit due to the presence of Bovine Spongiform Encephalopathy (BSE) in the United Kingdom. APHIS has not declared England free of Classical Swine Fever (Hog Cholera) for the counties of Essex, Norfolk, and Suffolk. Office of International Epizootics (OIE) did declare England free of Foot and Mouth Disease but APHIS had not, at the time of this audit. No poultry establishments were certified as eligible to export to the United States.

During calendar year 2001, England establishments exported 830,572 pounds of pork carcasses and cuts to the U.S. There was no port-of-entry (POE) rejection for the above-noted year.

PROTOCOL

This on-site audit was conducted in three parts. One part involved visits with England national meat/poultry inspection officials to discuss oversight programs and practices, including enforcement activities. The second was conducted by on-site visits to establishments. The third was a visit to two private laboratories, one performing analytical testing of field samples for the national residue testing program, and the other culturing field samples for the presence of microbiological contamination with *Salmonella*.

England's program effectiveness was assessed by evaluating five areas of risk: (1) sanitation controls, including the implementation and operation of Sanitation Standard Operating Procedures (SSOPs), (2) animal disease controls, (3) residue controls, (4) slaughter/processing controls, including the implementation and operation of Hazard Analysis and Critical Control Point (HACCP) systems and the *E. coli* testing program, and (5) enforcement controls, including the testing program for *Salmonella* species.

During all on-site establishment visits, the auditor evaluated the nature, extent, and degree to which findings impacted on food safety and public health, as well as overall program delivery. The auditor also determined if establishment and inspection system controls were in place. Establishments that do not have effective controls in place to prevent, detect and eliminate product contamination/adulteration are considered unacceptable and therefore ineligible to export products to the U.S., and are delisted accordingly by the country's meat inspection officials.

RESULTS AND DISCUSSION

Summary

Effective inspection system controls were found to be in place in the three establishments audited; one of these (Est. 2060) was issued a 30-day letter requiring completed correction of the SSOP deficiencies and associated documentation. Details of audit findings, including compliance with HACCP, SSOPs, and testing programs for *Salmonella* and generic *E. coli*, are discussed later in this report.

As stated above, seven major concerns had been identified during the last audit of the England meat inspection system conducted in May 2000. During this new audit, the auditor determined that the concerns had been addressed and corrected, except for the ante-mortem inspection performed in Establishment 2060 and contamination prevention in Ests. 2060 and 2134.

Entrance Meeting

On February 11, 2002, an entrance meeting was held in the London offices of the Department for Environment, Food and Rural Affairs (DEFRA) and was attended by Mr. Nigel Gibbens, Deputy Head, Veterinary International Trade Team, DEFRA; Dr. Alistair Booth, Veterinary Meat Hygiene Advisor, Food Standards Agency (FSA); Mr. Simon Hall, Veterinary Advisor, Veterinary International Trade Team, DEFRA; Mr. Steve Knight, Agricultural Economist, American Embassy, London; Mr. Steve McDermott, Equivalence Staff Officer, Office of Policy, Program Development and Evaluation (OPPDE), FSIS; and Dr. Oto Urban, International Audit Staff Officer, FSIS. Topics of discussion included the following:

1. The audit itinerary and lodging accommodations were finalized.
2. The review of the governmental oversight of the U.S. export approved establishments by the Equivalency Staff Officer was explained.
3. The auditor provided copies of the data-collection instruments he would be using in the audits of the individual establishments (Attachments A, B, C, and D).

Headquarters Audit

The Department for Environment, Food & Rural Affairs (DEFRA), formerly the Ministry of Agriculture, Fisheries and Food, is the central competent authority legislated to enforce Great Britain's meat and poultry inspection regulations. DEFRA carries out its meat and poultry inspection responsibilities by contracting the services of the Food Standards Agency (FSA), a government agency within Great Britain's Department of Health. Through direction from DEFRA, FSA regulates Great Britain's exports of meat and poultry to the United States.

To gain an accurate overview of the effectiveness of inspection controls, FSIS requested that the audits of the individual establishments be led by the inspection officials who normally conduct the periodic reviews for compliance with U.S. specifications. The FSIS auditor (hereinafter called “the auditor”) observed and evaluated the process.

The auditor conducted a review of inspection system documents pertaining to the establishments listed for records review. This records review was conducted in the inspection service offices at the audited establishments. The records review focused primarily on food safety hazards and included the following:

- Internal review reports.
- Sampling and laboratory analyses for residues.
- Pathogen reduction and other food safety initiatives such as SSOPs, HACCP programs, generic *E. coli* testing and *Salmonella* testing.
- Sanitation, slaughter and processing inspection procedures and standards.
- Control of products from livestock with conditions such as tuberculosis, cysticercosis, etc., and of inedible and condemned materials.
- Export product inspection and control including export certificates.

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

Government Oversight

The Meat Hygiene Service (MHS), an executive agency of FSA, provides the government veterinarians and inspectors for “approved” meat and poultry establishments (domestic and exporting) by either direct hiring or through contract services. All official veterinarians assigned to the three British establishments currently certified to export to the United States are on contract to MHS. Nearly all official inspectors are MHS employees. The remaining official inspectors are obtained through the same contract services with official veterinarians. Veterinarian contracts are reviewed annually and renewed every three years by FSA. FSA has the authority to cancel the contracts with veterinarians at any time deemed necessary. All official veterinarians and inspectors receive no remuneration for official British inspection services from either industry or establishment personnel.

The official veterinarians and inspectors report directly to the Principal Official Veterinary Surgeons (POVS), which are stationed throughout Great Britain and are full-time employees of MHS. The POVSs report directly to FSA supervisors stationed in field locations, who in turn report directly to DEFRA.

For establishments certified to export to the United States, FSA provides instructions and training to official veterinarians and inspectors regarding U.S. import requirements. FSA also assists DEFRA regarding the licensing of exporting establishments.

Regarding the government oversight of the chemistry laboratory conducting analyses for products being exported to the United States, this function is carried out by the Veterinary Medicines Directorate (VMD), an executive agency of DEFRA. VMD also oversees the approval and use of veterinarian drugs in the United Kingdom. The FSA performs government oversight of the microbiology laboratory conducting analyses for U.S.-destined product.

Establishment Audits

Three establishments (2060, 2134, and 2182) were certified to export meat products to the United States at the time this audit was conducted. No poultry establishments were currently certified for U.S. export. All three establishments were visited for on-site audits, and both MHS inspection system controls and establishment system controls were in place to prevent, detect and control contamination and adulteration of products, except in two establishments, where instances of direct product contamination were observed (See Sanitation Controls section).

Laboratory Audits

During the laboratory audits, emphasis was placed on the application of procedures and standards that were equivalent to U.S. requirements. Information was also collected about the risk areas of government oversight of accredited, approved, and private laboratories; intra-laboratory quality assurance procedures, including sample handling; and methodology.

The Laboratory of the Government Chemist in Teddington, Surrey was audited on February 18, 2002. In spite of the official name of the laboratory, it was not owned or operated by the agencies involved with the meat inspection service, but rather was privately owned. Effective controls were in place for sample handling and frequency, timely analysis, data reporting, acceptable method for analysis, equipment operation and printouts, minimum detection levels, recovery frequency, and corrective actions. The methods used for the analyses were acceptable. No compositing of samples was done (this was not a deficiency).

The laboratory was not testing for arsenic, which is tested for in the U.S. The choice of tissue for DES testing was bile and urine.

England's microbiological testing for *Salmonella* was being performed in a private laboratory, Allied Laboratory Services Ltd., in Grimsby. It was audited on February 12, 2002. The auditor determined that the system met the criteria established for the use of private laboratories under FSIS's Pathogen Reduction/HACCP rule. These criteria are:

1. The laboratories have been accredited/approved by the government, accredited by third party accrediting organization with oversight by the government, or a government contract laboratory.

2. The laboratories have properly trained personnel, suitable facilities and equipment, a written quality assurance program, and reporting and record-keeping capabilities.
3. Results of analyses are being reported to the government or simultaneously to the government and establishment.

No concerns arose as a result of the audit of this laboratory.

Establishment Operations by Establishment Number

The following operations were being conducted in the three establishments:

Pork slaughter, cutting, and (not for U.S. export) boning and cooked hams (Est. 2060)
Pork cutting, and boning and (not for U.S. export) curing (Est. 2134)
Cold storage facility (Est. 2182)

SANITATION CONTROLS

Based on the on-site audits of establishments, England's inspection system had controls in place for water potability, chlorination procedures, back-siphonage prevention, sanitizers, establishments separation, pest evidence, control program and monitoring, temperature control, lighting, operation and inspection work place, ventilation, facilities approval, other product areas, antemortem facilities, welfare facilities, equipment sanitizing, product reconditioning, product transportation, effective maintenance program, operational sanitation and waste disposal.

Sanitation Standard Operating Procedures (SSOPs)

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOPs were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment A).

The SSOPs were found to meet the basic FSIS regulatory requirements, with only occasional minor variations, except in Establishment 2060, where SSOP pre-operational deficiencies were observed. The following variations were observed:

1. The records of SSOP procedures did not indicate any preventive action (Ests. 2060 and 2134). Establishment officials scheduled these deficiencies for correction.
2. The SSOP preventive measures were written but not implemented in all cases and there was a general statement of individuals responsible for cleaning procedures, not a description of each cleaning procedure (Est. 2182). These deficiencies were scheduled for correction by the establishment.

Cross-Contamination

1. The knife sharpener was observed to contact the trimmer's boots in Est. 2060. This deficiency was corrected immediately by the establishment management officials.
2. Several plastic curtains with potential of contacting exposed product were observed in Est. 2134. The establishment officials scheduled this deficiency for correction.

Sanitary dressing procedures

1. Fecal contamination was observed on one carcass out of 15 in the cooler (Est. 2060). Establishment management officials performed the proper corrective action.
2. The employee responsible for removing viscera was observed to contaminate offals with his boots and also allowed the offal to contact the floor (Est. 2060). This deficiency was corrected immediately by the establishment officials.

Over-product equipment

1. Condensation was observed on the rail over exposed product in the chiller (Est. 2060). This deficiency was corrected immediately by the establishment officials.
2. Grease from rails and other sources was observed on several carcasses and in boxed trimmings (Est. 2134). The establishment has a policy of continuous trimming but not a trimming station at which carcasses should be trimmed. This was scheduled for correction by both the inspection service and establishment management.

Over-product ceiling

1. Condensation was observed over boning tables with exposed product (Est. 2134). The inspection service and establishment management performed proper immediate corrective action.
2. A leaking pipe was observed in close proximity to the product processing area in the boning room (Est. 2134). The establishment officials performed proper immediate corrective action.

Hand-Washing Facilities

There was no waste basket at the hand wash station in the product inspection room (Est. 2182). This deficiency was corrected immediately by the establishment official.

Pre-operational sanitation

There was a failure of the pre-operational sanitation in several areas of Est. 2060, which was issued a 30-day letter requiring completed correction of the SSOP deficiencies and associated documentation. Oil, hair, fat, dry meat and grease were observed on product-contact equipment in the processing areas. Except in two cases, corrective action was performed immediately by establishment management. Two cases of corrective action that were not immediately performed included a liner in the box contacting the wall and a carcass splitting saw which was in the close proximity of the floor, with a potential for the saw contamination.

ANIMAL DISEASE CONTROLS

With the exceptions listed below, England's inspection system had controls in place to ensure adequate animal identification, dispositions, restricted product control, and procedures for sanitary handling of returned and rework product.

1. Moving animals were observed by the veterinary inspector from one side and by the establishment official on the other side during the ante-mortem inspection. According to European Council Directive 64/433 article 3 (c), the official veterinarian should inspect animals. This deficiency was scheduled for correction.
2. Mesenteric lymph nodes were not inspected by the veterinary inspection on post-mortem inspection. The supervisory veterinarian immediately corrected this deficiency.
3. A metal car for storage of condemned product was not properly identified. This was scheduled for correction by the inspection service and the establishment management.

It was reported that Great Britain had Foot and Mouth Disease outbreaks since the previous U.S. audit. OIE did declare Great Britain free of Foot and Mouth Disease but APHIS had not, at the time of this audit.

Importation of beef or beef products was not allowed at the time of this audit due to the presence of BSE in the United Kingdom. APHIS has not declared England free of Classical Swine Fever (Hog Cholera) for the counties of Essex, Norfolk, and Suffolk.

RESIDUE CONTROLS

England's National Residue Testing Plan for 2002 was being followed, and was on schedule. The English inspection system had adequate controls in place to ensure compliance with sampling and reporting procedures and storage and use of chemicals.

SLAUGHTER/PROCESSING CONTROLS

The English inspection system had controls in place to ensure disposition of dead, dying, diseased or disabled animals, humane handling and slaughter, pre-boning trim, boneless meat reinspection, ingredients identification, packaging materials, and laboratory confirmation.

HACCP Implementation

All establishments approved to export meat/poultry products to the U.S. are required to have developed and implemented a Hazard Analysis Critical Control Point (HACCP) system. Each of these systems was evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment B).

The HACCP programs were found to meet the basic FSIS regulatory requirements except for the following:

- Several HACCP implementation deficiencies were observed in Est. 2134. Accordingly, the Critical Control Point (CCP) [metal detector] referenced in the HACCP plan was based on the purchaser's quality standard for size of acceptable metal particles and not on public health risk. Additionally, validation was not properly performed, and observations were responding to a non-CCP rather than taking corrective action when deviation from the CCP occurs. Establishment officials scheduled these

deficiencies for correction.

Testing for Generic *E. coli*

England had adopted the FSIS regulatory requirements for generic *E. coli* testing.

One establishment audited was required to meet the basic FSIS regulatory requirements for generic *E. coli* testing, and was audited and evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment C).

The *E. coli* testing programs were found to meet the basic FSIS regulatory requirements, except that Establishment 2060 was using the sponging method for *E. coli* sampling but they did not develop their own statistical process control and were using an excision method criteria for evaluation of their results.

Additionally, establishments had adequate controls in place to prevent meat products intended for England domestic consumption from being commingled with products eligible for export to the U.S.

ENFORCEMENT CONTROLS

Inspection System Controls

The MHS inspection system controls [control of restricted product and inspection samples, boneless meat reinspection, shipment security, including shipment between establishments, prevention of commingling of product intended for export to the United States with domestic product, monitoring and verification of establishment programs and controls (including the taking and documentation of corrective actions under HACCP plans), inspection supervision and documentation, the importation of only eligible livestock or poultry from other countries (i.e., only from eligible countries and certified establishments within those countries), and the importation of only eligible meat or poultry products from other countries for further processing] were in place and effective in ensuring that products produced by the establishment were wholesome, unadulterated, and properly labeled. In addition, adequate controls were found to be in place for security items, shipment security, and products entering the establishments from outside sources.

Testing for *Salmonella* Species

One establishment audited (Est. 2060) was required to meet the basic FSIS regulatory requirements for *Salmonella* testing, and was evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment D).

England has adopted the FSIS regulatory requirements for *Salmonella* testing with exception of the following equivalent measures:

1. **SAMPLE COLLECTOR: Establishment Takes Samples.** The criteria used for equivalence decisions for use of establishment employees in lieu of government employees are:
 - There is a clearly written sampling plan with instructions for sample collection and processing that will be universally followed.
 - The government has a means of ensuring that establishment sample collection activities are appropriate.
 - The government uses test results to monitor establishment performance over time.
 - The government takes immediate action any time an establishment fails to meet a *Salmonella* performance standard.

2. **LABORATORIES:** A private Laboratory in Grimsby has been used. The criteria used for equivalence decisions for the use of private laboratories in lieu of government laboratories are:
 - The laboratory is accredited/approved by the government, accredited by a third-party accrediting organization with oversight by the government, or a government contract laboratory.
 - The laboratory has properly trained personnel, suitable facilities and equipment, a written quality assurance program, and reporting and record-keeping capabilities.
 - Results of analyses are being reported to the government or simultaneously to the government and establishment

Species Verification Testing

At the time of this audit, England was not exempt from the species verification-testing requirement, yet the verification had been discontinued. English government officials had officially requested an exemption, but a decision had not yet been made by FSIS. England has ceased to export to the United States for approximately one year due to APHIS restrictions regarding Foot and Mouth Disease. English government officials indicated that species testing would occur once exports resumed and an exemption had not yet been granted.

Monthly Reviews

Monthly reviews were being performed by Principal Official Veterinary Surgeons (POVS). All were veterinarians with in-plant experience, and were promoted to this position within the organization. All had received special instruction and on-going training in foreign requirements.

The internal review program was being applied equally to both export and non-export establishments but the one month time frame is maintained only for the U.S. export certified establishments. Internal review visits were not announced to establishment personnel, while inspection personnel were given advance notice. These reviews were conducted by single individuals, at least once a month. The records of audited establishments were kept in the inspection offices of the individual establishments, copies were kept in the regional offices, and were routinely maintained on file for a minimum of one year. This is the procedure when England is actively exporting to the U.S.

Due to the FMD outbreak, England was currently not exporting any product to the U.S., and was not performing monthly supervisory reviews. This would begin once exports resumed.

According to Section 327.2 (a)(2)(iv)(a) and (b) of Title 9 of the U.S. Federal Code of Regulation, supervisory visits and written reports of the results, are required to be made to all establishments certified as eligible to export to the U.S., and they are to be made at least monthly, except during a period when the establishment is not operating or is not engaged in producing products for exportation to the U.S.

Enforcement Activities

DEFRA is the central competent authority legislated to enforce Great Britain's meat and poultry inspection regulations. DEFRA carries out its meat and poultry inspection responsibilities by contracting the services of the Food Standards Agency (FSA), a government agency within Great Britain's Department of Health. Through direction from DEFRA, FSA regulates Great Britain's exports of meat and poultry to the United States. The Meat Hygiene Service (MHS), an executive agency of FSA, provides the government veterinarians and inspectors for "approved" meat and poultry establishments (domestic and exporting) by either direct hiring or through contract services.

England's Enforcement and Food Standard Group included two divisions to help local authorities improve the effectiveness of local enforcement of food standards legislation and to help consolidate and further develop the work on enforcing food laws. The first of the two divisions, the Local Authority Enforcement (Policy) Division, set standards for local authorities' enforcement of food laws and monitors their performance against those standards. The other, the Local Authority Enforcement (Support) Division, worked with local authority enforcement services to improve standards by providing advice, guidance, and training on technical, professional, and legislation issues, and furthermore took over responsibility for the existing food hazard warning system, policy on statutory enforcement powers, and import controls on fish and food of non-animal origin.

The Meat Hygiene Service was responsible for standards of meat hygiene in all licensed establishments.

The Food Labeling, Standards and Consumer Protection Division managed a program of surveys and investigations to check the level of food adulteration, “misdescription,” and fraud, and ensured that food met appropriate quality standards.

The Food Emergencies Unit developed standards and protocols for the Food Standards Agency’s handling of emergencies and developed generic risk-management approaches for use in internal incident plans.

Exit Meetings

An exit meeting was conducted in London on February 19, 2002. The participants included Mr. Robert Bell, Head, Veterinary International Trade Team, (DEFRA); Dr. Alistair Booth, Veterinary Meat Hygiene Advisor, Mr. Steve Knight, Agricultural Economist, American Embassy, London; Mr. Steve McDermott, Equivalence Staff Officer, FSIS; and Dr. Oto Urban, International Staff Officer, FSIS. The following topics were discussed:

1. Pre-operational sanitation deficiencies in several areas of Establishment 2060 were discussed, including the 30-day letter that was issued. Oil, hair, fat, dry meat and grease were observed on the product-contact equipment in the processing areas. Except in two cases, corrective action was performed immediately by establishment management. MHS officials promised improved monitoring and verification of pre-operational sanitation procedures.
2. MHS officials gave assurances that they would ensure follow-up monitoring of the effectiveness of corrective actions taken in the field regarding the problems of deficient personal hygiene practices, condensation control, and cross-contamination.
3. “Zero tolerance” for fecal contamination was stressed. MHS officials reconfirmed their commitment to monitor this critical deficiency.
4. Sanitary dressing procedures, offal contamination by an establishment employee. The preventive action was promised by the inspection service.
5. Grease from over-product equipment contaminating product, and the suggestion of adding a trim station for the contaminated product was discussed. Prompt compliance was promised.
6. Ante-mortem and post-mortem inspection procedure deficiencies and missing “condemned” labeling were discussed. The MHS officials promised corrective action.
7. No requirement for arsenic residue testing and different tissue (urine & bile) used for DES analysis was discussed.
8. The use of the sponging method for *E. coli* sampling but not developing its own statistical process control and using excision method criteria for evaluation of the *E. coli* test results. Corrective action was promised by MHS officials.

CONCLUSION

The inspection system of England was found to have effective controls to ensure that product destined for export to the United States was produced under conditions equivalent to those which FSIS requires in domestic establishments. Three establishments were audited: one establishment was issued a 30-day letter due to the SSOP pre-operational sanitation deficiencies.

The other deficiencies encountered during the on-site establishment audits were adequately addressed to the auditor's satisfaction before the termination of each audit.

Dr. Oto Urban
International Audit Staff Officer

(signed) Dr. Oto Urban

ATTACHMENTS

- A. Data collection instrument for SSOPs
- B. Data collection instrument for HACCP programs
- C. Data collection instrument for *E. coli* testing
- D. Data collection instrument for *Salmonella* testing
- E. Laboratory Audit Forms
- F. Individual Foreign Establishment Audit Forms
- G. Written Foreign Country's Response to the Draft Final Audit Report

Data Collection Instrument for SSOPs

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOPs were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument contained the following statements:

1. The establishment has a written SSOP program.
2. The procedure addresses pre-operational sanitation.
3. The procedure addresses operational sanitation.
4. The pre-operational procedures address (at a minimum) the cleaning of food-contact surfaces of facilities, equipment, and utensils.
5. The procedure indicates the frequency of the tasks.
6. The procedure identifies the individuals responsible for implementing and maintaining the activities.
7. The records of these procedures and any corrective action taken are being maintained on a daily basis.
8. The procedure is dated and signed by the person with overall on-site authority.

The results of these evaluations were as follows:

Est. #	1. Written program addressed	2. Pre-op sanitation addressed	3. Oper. sanitation addressed	4. Contact surfaces addressed	5. Frequency addressed	6. Responsible indiv. identified	7. Documentation done daily	8. Dated and signed
2060	√	√	√	√	√	√	√*	√
2134	√	√	√	√	√	√	√*	√
2182	√	√	√	√	√	√*	√*	√

*2060 – 7. The preventive action was missing.

*2134 – 7. The preventive action was missing.

*2182 – 7. The SSOP preventive measures were written but not implemented in all cases. *2182 – 6. There was a general statement of individuals responsible for cleaning procedures, not an identification on each cleaning procedure.

Data Collection Instrument for HACCP Programs

Each of the establishments approved to export meat products to the U.S. was required to have developed and implemented a Hazard Analysis – Critical Control Point (HACCP) system. Each of these systems was evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument included the following statements:

1. The establishment has a flow chart that describes the process steps and product flow.
2. The establishment has conducted a hazard analysis that includes food safety hazards likely to occur.
3. The analysis includes the intended use of or the consumers of the finished product(s).
4. There is a written HACCP plan for each product where the hazard analysis revealed one or more food safety hazard(s) reasonably likely to occur.
5. All hazards identified in the analysis are included in the HACCP plan; the plan lists a CCP for each food safety hazard identified.
6. The HACCP plan specifies critical limits, monitoring procedures, and the monitoring frequency performed for each CCP.
7. The plan describes corrective actions taken when a critical limit is exceeded.
8. The HACCP plan was validated using multiple monitoring results.
9. The HACCP plan lists the establishment’s procedures to verify that the plan is being effectively implemented and functioning and the frequency for these procedures.
10. The HACCP plan’s record-keeping system documents the monitoring of CCPs and/or includes records with actual values and observations.
11. The HACCP plan is dated and signed by a responsible establishment official.
12. The establishment is performing routine pre-shipment document reviews.

The results of these evaluations were as follows:

Est. #	1. Flow diagram	2. Hazard analysis conducted	3. Use & users included	4. Plan for each hazard	5. CCPs for all hazards	6. Monitoring is specified	7. Corr. actions are described	8. Plan validated	9. Adequate verific. procedures	10. Adequate documentation	11. Dated and signed	12. Pre-shipment doc. review
2060	√	√	√	√	√	√	√	√	√	√	√	√
2134	√	√	√	√	√	√	√*	√	√*	√	√*	√
2182	√	√	√	√	√	√	√	√	√	√	√	√

The following HACCP program implementation deficiencies such as:

- 2134 – 7 Critical limits were not specified for physical hazard (metal detector).
- 2134 – 9 Not properly performed validation.
- 2134 – 11 Records with observations responding to a non-CCP.

Data Collection Instrument for Generic *E. coli* Testing

Each establishment (except Est. 2182, which was a cold-storage facility) was evaluated to determine if the basic FSIS regulatory requirements for generic *E. coli* testing were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument contained the following statements:

1. The establishment has a written procedure for testing for generic *E. coli*.
2. The procedure designates the employee(s) responsible to collect the samples.
3. The procedure designates the establishment location for sample collecting.
4. The sample collection is done on the predominant species being slaughtered.
5. The sampling is done at the frequency specified in the procedure.
6. The proper carcass site(s) and/or collection methodology (sponge or excision) is/are being used for sampling.
7. The carcass selection is following the random method specified in the procedure or is being taken randomly.
8. The laboratory is analyzing the sample using an AOAC Official Method or an equivalent method.
9. The results of the tests are being recorded on a process control chart showing the most recent test results.
10. The test results are being maintained for at least 12 months.

Est. #	1. Written procedure	2. Sampler designated	3. Sampling location given	4. Predominant species sampled	5. Sampling at the req'd freq.	6. Proper site or method	7. Sampling is random	8. Using AOAC method	9. Chart or graph of results	10. Results are kept at least 1 yr
2060	√	√	√	N/A	√	√	√	√	√*	√
2134	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2182	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

2060 – 9. The use of the sponging method for *E. coli* sampling but not developing its own statistical process controls and using excision method criteria for evaluation of the *E. coli* test results.

Data Collection Instrument for *Salmonella* testing

Each slaughter establishment was evaluated to determine if the basic FSIS regulatory requirements for *Salmonella* testing were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument included the following statements:

1. *Salmonella* testing is being done in this establishment.
2. Carcasses are being sampled.
3. Ground product is being sampled.
4. The samples are being taken randomly.
5. The proper carcass site(s) and/or collection of proper product (carcass or ground) is being used for sampling.
6. Establishments in violation are not being allowed to continue operations.

The results of these evaluations were as follows:

Est. #	<i>1. Testing as required</i>	<i>2. Carcasses are sampled</i>	3. Ground product is sampled	4. Samples are taken randomly	5. Proper site and/or proper prod.	6. Violative est's stop operations
2060	√	√	N/A	√	√	√
2134	N/A	N/A	N/A	N/A	N/A	N/A
2182	N/A	N/A	N/A	N/A	N/A	N/A

U.S. DEPARTMENT OF AGRICULTURE
 FOOD SAFETY AND INSPECTION SERVICE
 INTERNATIONAL PROGRAMS

REVIEW DATE

NAME OF FOREIGN LABORATORY

2/12/02

Allied Laboratory Services Ltd.

FOREIGN COUNTRY LABORATORY REVIEW

FOREIGN GOV'T AGENCY
 DEFRA

CITY & COUNTRY
 Grimsby, England

ADDRESS OF LABORATORY
 Grimsby, England

NAME OF REVIEWER
 Dr. Oto Urban

NAME OF FOREIGN OFFICIAL

Residue Code/Name		E.co	Sal																	
SAMPLING PROCEDURES	REVIEW ITEMS	ITEM #	EVALUATION CODE																	
	Sample Handling	01		A	A															
	Sampling Frequency	02		A	A															
	Timely Analyses	03		A	A															
	Compositing Procedure	04		O	O															
	Interpret Comp Data	05		O	O															
	Data Reporting	06	A	A																
ANALYTICAL PROCEDURES	Acceptable Method	07	A	A																
	Correct Tissue(s)	08	A	A																
	Equipment Operation	09	O	O																
	Instrument Printouts	10	O	O																
QUALITY ASSURANCE PROCEDURES	Minimum Detection Levels	11	O	O																
	Recovery Frequency	12	O	O																
	Percent Recovery	13	O	O																
	Check Sample Frequency	14	A	A																
	All analyst w/Check Samples	15	A	A																
	Corrective Actions	16	A	A																
	International Check Samples	17	O	O																
REVIEW PROCEDURES	Corrected Prior Deficiencies	18	O	O																
OTHER REVIEW		19	EVAL. CODE																	
		20	EVAL. CODE																	

SIGNATURE OF REVIEWER

DATE

2/18/02

Laboratory of the Government Chemist

FOREIGN COUNTRY LABORATORY REVIEW

FOREIGN GOV'T AGENCY
 DEFRA

CITY & COUNTRY
 London, England

ADDRESS OF LABORATORY
 Queens Road, Taddinton, Middlesex

NAME OF REVIEWER
 Dr. Olo Urban

NAME OF FOREIGN OFFICIAL
 Mr. John A Day, Mr. Eric Crutcher, Dr. Jack F Kay

Residue Code/Name			100	200	203	300	400	500	800	910	923			
SAMPLING PROCEDURES	REVIEW ITEMS	ITEM #	EVALUATION CODE											
	Sample Handling	01	A	A	A	A	C	A	A	A	A			
	Sampling Frequency	02	A	A	A	A	C	A	A	A	A			
	Timely Analyses	03	A	A	A	A	C	A	A	A	A			
	Compositing Procedure	04	O	O	O	O	O	O	O	O	O			
	Interpret Comp Data	05	O	O	O	O	O	O	O	O	O			
Data Reporting	06	A	A	A	A	C	A	A	A	A				
ANALYTICAL PROCEDURES	Acceptable Method	07	A	A	A	A	C	A	A	A	A			
	Correct Tissue(s)	08	A	A	A	A	C	C	A	A	A			
	Equipment Operation	09	A	A	A	A	C	A	A	A	A			
	Instrument Printouts	10	A	A	A	A	C	A	A	A	A			
QUALITY ASSURANCE PROCEDURES	Minimum Detection Levels	11	A	A	A	A	C	A	A	A	A			
	Recovery Frequency	12	A	A	A	A	C	A	A	A	A			
	Percent Recovery	13	A	A	A	A	C	A	A	A	A			
	Check Sample Frequency	14	A	A	A	A	C	A	A	A	A			
	All analyst w/Check Samples	15	A	A	A	A	C	A	A	A	A			
	Corrective Actions	16	A	A	A	A	C	A	A	A	A			
International Check Samples	17	A	A	A	A	C	A	A	A	A				
REVIEW PROCEDURES	Corrected Prior Deficiencies	18	O	O	O	O	O	O	O	O	O			
OTHER REVIEW		19												
		20												

SIGNATURE OF REVIEWER

DATE

FOREIGN COUNTRY LABORATORY REVIEW <i>(Comment Sheet)</i>		REVIEW DATE 2/18/02	NAME OF FOREIGN LABORATORY Laboratory of the Government Chemist
FOREIGN GOV'T AGENCY DEFRA	CITY & COUNTRY London, England	ADDRESS OF LABORATORY Queens Road, Taddinton, Middlesex	
NAME OF REVIEWER Dr. Oto Urban		NAME OF FOREIGN OFFICIAL Mr. John A Day, Mr. Eric Crutcher, Dr. Jack F Kay	

RESIDUE	ITEM	COMMENTS
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400	All	The laboratory was not testing for arsenic (AS).
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500	8	Urine and bile were used as matrices for DES analysis.
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* In spite of the official name of the laboratory, it was not owned or operated by the government agencies involved with meat inspection, but rather privately-owned.

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE INTERNATIONAL PROGRAMS FOREIGN PLANT REVIEW FORM	REVIEW DATE 2/13/02	ESTABLISHMENT NO. AND NAME 2060 Grampian Country Pork - Molton	CITY Molton COUNTRY England
NAME OF REVIEWER Dr. Oto Urban	NAME OF FOREIGN OFFICIAL Dr. Alistair Booth		EVALUATION <input type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable

CODES (Give an appropriate code for each review item listed below)
 A = Acceptable M = Marginally Acceptable U = Unacceptable N = Not Reviewed O = Does not apply

1. CONTAMINATION CONTROL	Cross contamination prevention	28 M	Formulations	55 O
(a) BASIC ESTABLISHMENT FACILITIES	Equipment Sanitizing	29 A	Packaging materials	56 A
Water potability records	Product handling and storage	30 A	Laboratory confirmation	57 A
Chlorination procedures	Product reconditioning	31 A	Label approvals	58 O
Back siphonage prevention	Product transportation	32 A	Special label claims	59 O
Hand washing facilities	(d) ESTABLISHMENT SANITATION PROGRAM		Inspector monitoring	60 O
Sanitizers	Effective maintenance program	33 A	Processing schedules	61 O
Establishments separation	Preoperational sanitation	34 U	Processing equipment	62 O
Pest --no evidence	Operational sanitation	35 A	Processing records	63 O
Pest control program	Waste disposal	36 A	Empty can inspection	64 O
Pest control monitoring	2. DISEASE CONTROL		Filling procedures	65 O
Temperature control	Animal identification	37 A	Container closure exam	66 O
Lighting	Antemortem inspec. procedures	38 M	Interim container handling	67 O
Operations work space	Antemortem dispositions	39 A	Post-processing handling	68 O
Inspector work space	Humane Slaughter	40 A	Incubation procedures	69 O
Ventilation	Postmortem inspec. procedures	41 M	Process. defect actions -- plant	70 O
Facilities approval	Postmortem dispositions	42 A	Processing control -- inspection	71 O
Equipment approval	Condemned product control	43 M	5. COMPLIANCE/ECON. FRAUD CONTROL	
(b) CONDITION OF FACILITIES EQUIPMENT	Restricted product control	44 A	Export product identification	72 A
Over-product ceilings	Returned and rework product	45 A	Inspector verification	73 A
Over-product equipment	3. RESIDUE CONTROL		Export certificates	74 O
Product contact equipment	Residue program compliance	46 A	Single standard	75 A
Other product areas (<i>inside</i>)	Sampling procedures	47 A	Inspection supervision	76 A
Dry storage areas	Residue reporting procedures	48 A	Control of security items	77 A
Antemortem facilities	Approval of chemicals, etc.	49 A	Shipment security	78 A
Welfare facilities	Storage and use of chemicals	50 A	Species verification	79 O
Outside premises	4. PROCESSED PRODUCT CONTROL		"Equal to" status	80 A
(c) PRODUCT PROTECTION & HANDLING	Pre-boning trim	51 A	Imports	81 O
Personal dress and habits	Boneless meat reinspection	52 A	SSOP	82 M
Personal hygiene practices	Ingredients identification	53 A	E. coli	83 M
Sanitary dressing procedures	Control of restricted ingredients	54 O		

FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE	ESTABLISHMENT NO. AND NAME	CITY
	2/13/02	2060 Grampian Country Pork - Molton	Molton
			COUNTRY
			England
NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL	EVALUATION	
Dr. Oto Urban	Dr. Alistair Booth	<input type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable	

COMMENTS:

- 18 - Over product non-dripping condensation from the rail was observed in the chiller. This deficiency was corrected immediately by the establishment officials.
- 26 - In the hand-washing area, an establishment employee was observed to pick up his glove from the floor, contaminate his equipment and the other glove and, without sanitizing them, he entered the processing area. This occurrence was unnoticed by the establishment official as well as inspection officials.
- 27 - Fecal contamination was observed on one carcass out of 15 in the cooler. The proper corrective action was performed by the establishment management.
- 27 - The employee responsible for removing viscera was observed to contaminate offals with his boots and floor. This deficiency was corrected immediately by the establishment officials.
- 28 - The knife sharpener was observed to contact the trimmer's boots. This deficiency was corrected immediately by the establishment management.
- 34 - There was a failure of pre-operational sanitation in several areas of the establishment. Oil, hair, fat, dry meat and grease were observed on the product contact equipment in the processing areas. Except in two cases, corrective action was immediately performed by the establishment management. The two cases of corrective action that was not immediately performed included a liner in the box contacting the wall and a carcass splitting saw was in close proximity to the floor.
- 38 - Moving animals were observed by the veterinary inspector from one side and by the establishment officials on the other side during the ante-mortem inspection. According to European Council Directive 64/433 article 3 (c), animals should be inspected by the veterinarian. This deficiency was scheduled for correction.
- 41 - Mesenteric lymph nodes were not palpated by the official veterinarian during post-mortem inspection. This deficiency was immediately corrected by the supervisory veterinarian.
- 43 - Metal car for storage of condemned product was not properly identified. This was scheduled for correction by the inspection service and the establishment management.
82. The records of SSOP procedures did not indicate any preventive action. This was scheduled for correction by the establishment officials.
83. Establishment was using the sponging method for *E. coli* sampling but they did not develop their own statistical process control and were using excision method criteria for evaluation of their results.

FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE	ESTABLISHMENT NO. AND NAME	CITY
	2/14/02	2134 Grampian Country Pork (Ossett)	Wakefield
			COUNTRY
			England
NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL	EVALUATION	
Dr. Oto Urban	Dr. Alistair Booth	<input type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable	

COMMENTS:

17 - Non-dripping condensation over boning tables with product were observed. Proper immediate corrective action was performed by the inspection service and establishment management.

17 - Leaking pipe in the close proximity of the product processing area was observed in the boning room. Proper immediate corrective action was performed by the establishment officials.

18 - Grease from rails and other sources was observed on several carcasses, even in boxed trimmings. The establishment has a policy of a continuous trimming but not a trimming station at which carcasses should be trimmed. This was scheduled for correction by both the inspection service and establishment management.

28 - Several plastic curtains with the potential of contacting exposed product were observed at this establishment. This deficiency was scheduled for correction by the establishment officials.

82 - The records of the SSOP procedures did not indicate any preventive action. The written SSOP records will include preventive action in the future.

83 - Several HACCP implementation deficiencies such as critical limits were not specified for physical hazard (metal detector), not properly performed validation and records with observations responding to a non-CCP were observed. These deficiencies were scheduled for correction by the establishment officials.

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE INTERNATIONAL PROGRAMS		REVIEW DATE	ESTABLISHMENT NO. AND NAME		CITY	
FOREIGN PLANT REVIEW FORM		2/15/02	2182 ABP Connect, Cold Storage		Kingston-upon-Hull	
					COUNTRY England	
NAME OF REVIEWER Dr. Oto Urban		NAME OF FOREIGN OFFICIAL Dr. Alistair Booth		EVALUATION <input type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/Re-review <input type="checkbox"/> Unacceptable		
CODES (Give an appropriate code for each review item listed below) A = Acceptable M = Marginally Acceptable U = Unacceptable N = Not Reviewed O = Does not apply						
1. CONTAMINATION CONTROL		Cross contamination prevention		28 A	Formulations	55 O
(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing		29 A	Packaging materials	56 O
Water potability records	01 A	Product handling and storage		30 A	Laboratory confirmation	57 O
Chlorination procedures	02 O	Product reconditioning		31 O	Label approvals	58 O
Back siphonage prevention	03 A	Product transportation		32 A	Special label claims	59 O
Hand washing facilities	04 M	(d) ESTABLISHMENT SANITATION PROGRAM			Inspector monitoring	60 O
Sanitizers	05 A	Effective maintenance program		33 A	Processing schedules	61 O
Establishments separation	06 A	Preoperational sanitation		34 O	Processing equipment	62 O
Pest --no evidence	07 A	Operational sanitation		35 A	Processing records	63 O
Pest control program	08 A	Waste disposal		36 A	Empty can inspection	64 O
Pest control monitoring	09 A	2. DISEASE CONTROL			Filling procedures	65 O
Temperature control	10 A	Animal identification		37 O	Container closure exam	66 O
Lighting	11 A	Antemortem inspec. procedures		38 O	Interim container handling	67 O
Operations work space	12 A	Antemortem dispositions		39 O	Post-processing handling	68 O
Inspector work space	13 O	Humane Slaughter		40 O	Incubation procedures	69 O
Ventilation	14 A	Postmortem inspec. procedures		41 O	Process. defect actions -- plant	70 O
Facilities approval	15 A	Postmortem dispositions		42 O	Processing control -- inspection	71 O
Equipment approval	16 O	Condemned product control		43 O	5. COMPLIANCE/ECON. FRAUD CONTROL	
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control		44 O	Export product identification	72 A
Over-product ceilings	17 A	Returned and rework product		45 O	Inspector verification	73 A
Over-product equipment	18 A	3. RESIDUE CONTROL			Export certificates	74 A
Product contact equipment	19 A	Residue program compliance		46 O	Single standard	75 A
Other product areas (inside)	20 A	Sampling procedures		47 O	Inspection supervision	76 A
Dry storage areas	21 A	Residue reporting procedures		48 O	Control of security items	77 A
Antemortem facilities	22 O	Approval of chemicals, etc.		49 A	Shipment security	78 A
Welfare facilities	23 A	Storage and use of chemicals		50 A	Species verification	79 O
Outside premises	24 A	4. PROCESSED PRODUCT CONTROL			"Equal to" status	80 A
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim		51 O	Imports	81 A
Personal dress and habits	25 M	Boneless meat reinspection		52 O	SSOP	82 M
Personal hygiene practices	26 A	Ingredients identification		53 O		
Sanitary dressing procedures	27 O	Control of restricted ingredients		54 O		

FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE	ESTABLISHMENT NO. AND NAME	CITY
	2/15/02	2182 ABP Connect, Cold Storage	Kingston-upon-Hull
			COUNTRY
			England
NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL	EVALUATION	
Dr. Oto Urban	Dr. Alistair Booth	<input type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable	

COMMENTS:

- 4 - Wastebasket was missing in the inspection room. This deficiency was corrected immediately by the establishment official.
- 25 - An employee helmet was found on the floor. This was corrected immediately by establishment management.
- 82 - The SSOP preventive measures were written but not implemented in all cases and there was a general statement of individuals responsible for cleaning procedures, not an identification on each cleaning procedure. These deficiencies were scheduled for correction by the establishment.

DEFRA
Department for
Environment,
Food & Rural Affairs

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E-mail: migel.gibbens@defra.gsi.gov.uk

Your reference:
Our reference: EXM 1243A

Sally Stratmoen, Chief
Equivalence Section, International Policy Staff
United States Dept of Agriculture
Food Safety and Inspection Service
Washington DC 20250
USA

26 July 2002

Dear Dr Stratmoen

FSIS AUDIT REPORT 11-19 FEBRUARY 2002

Thank you for your letter of 16 May 2002 enclosing Dr Urban's draft report. We received this on 27 May 2002. Thank you for the opportunity to comment.

Failure of pre-operational sanitation in several areas of establishment 2060
Deficiencies in SSOP records and application regarding preventive action

On 26 March 2002 we wrote to Mr Clark Danford confirming that corrective actions had been taken and that a further inspection had been carried out to confirm that standards were satisfactory.

The SSOP has been reviewed and amended. Written procedures now include remedial action to be taken following the identification of unsatisfactory cleaning. Additional training and improved management have been implemented.

Not testing meat products for arsenic

The UK is not obliged to include arsenic in the surveillance programme undertaken to comply with the requirements contained in Council Directive 96/23/EC. Medicines containing arsenic are not authorised for use in food producing animals anywhere in the EU. This does not mean to say that the UK cannot undertake surveillance arsenic testing but we have no intelligence to suggest possible abuse. Should we receive information suggesting that there may be abuse we will review the position.



Meat products contaminated with grease and faecal matter and the potential of product contamination due to condensation and a leaking water pipe,

As noted in the audit report, immediate corrective action was taken. In plant 2134, a secondary checking regime has been introduced at the head of the cutting lines to correct any contamination found on incoming product.

Establishment 2060 not using a statistical sampling process control for generic e-coli testing

The auditor kindly supplied some basic information and further clarification of criteria employed in the US domestic inspection programme was obtained when two of our officials visited the USA on a study tour. The regime for interpretation of sample results will be adapted to reflect US requirements before exports to the USA recommence.

We look forward to resumption of exports of pigmeat to the USA as soon as our foot and mouth disease freedom is recognised by your authorities.

Kind regards

Yours sincerely



NIGEL GIBBENS
HEAD, INTERNATIONAL ANIMAL HEALTH DIVISION

cc: James Hughes, BE Washington – james.hughes@fco.gov.uk
Steve Knight, US Embassy, London – knight@013.usdt.gov