



United States  
Department of  
Agriculture

Food Safety  
and Inspection  
Service

Washington, D.C.  
20250

OCT 12 2004

Dr. Georg Schreiber  
Director  
Federal Office of Consumer Protection and Food Safety  
Diedersdorfer Weg 1  
12277 Berlin – Marienfield  
Germany

Dear Dr. Schreiber:

The Food Safety and Inspection Service has completed an audit of Germany's meat inspection system. The audit was conducted from May 12 through May 27, 2004. Comments from Germany have been included in the final report. Enclosed is a copy of the final audit report.

If you have any questions about this audit or need additional information, please contact me at 202-720-3781, facsimile 202-690-4040, or email at [sally.white@fsis.usda.gov](mailto:sally.white@fsis.usda.gov).

Sincerely,

Sally White  
Director  
International Equivalence Staff  
Office of International Affairs

Enclosure

cc:

Rich Petges, Counselor, US Embassy, Berlin

Frederich Wacker, Agriculture Counselor, Embassy of Germany

Tony Van der haegen, EU Mission to the US, Washington, DC

Norval Francis, Minister-Counselor, US Mission to the EU, Brussels

Barbara Masters, Acting Administrator, FSIS

Linda Swacina, Executive Director, Food Safety Institute of the Americas

Scott Bleggi, FAS Area Officer

Donald Smart, Director, Review Staff, OPEER

Karen Stuck, Assistant Administrator, OIA

William James, Deputy Asst. Administrator, OIA

Sally White, Director, IES, OIA

Clark Danford, Director, IEPS, OIA

Mary Stanley, Director, IID, OIA

Amy Winton, State Department

Nancy Goodwin, IES, OIA

Todd Furey, IES, OIA

Country File (Germany—May04 Audit)

**FINAL**

SEP 27 2004

FINAL REPORT OF AN AUDIT CARRIED OUT IN  
GERMANY COVERING GERMANY'S MEAT INSPECTION  
SYSTEM

MAY 12 THROUGH MAY 27, 2004

Food Safety and Inspection Service  
United States Department of Agriculture

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## ABBREVIATIONS AND SPECIAL TERMS USED IN THE REPORT

CCA	Central Competent Authority (The Federal Office of Consumer Protection and Food Safety)
<i>E. coli</i>	<i>Escherichia coli</i>
FSIS	Food Safety and Inspection Service
PR/HACCP	Pathogen Reduction/Hazard Analysis and Critical Control Point
<i>Salmonella</i>	<i>Salmonella</i> species
SSOP	Sanitation Standard Operating Procedures
VEA	European Community/United States Veterinary Equivalence Agreement

## 1. INTRODUCTION

The audit took place in Germany from May 12 through May 27, 2004.

An opening meeting was held on May 12, 2004 in Berlin with the Central Competent Authority (CCA). At this meeting, the auditor confirmed the objective and scope of the audit and discussed the auditor's itinerary.

The auditor was accompanied during the entire audit by representatives from the CCA, The Federal Office of Consumer Protection and Food Safety, and/or representatives from the state, district, and local inspection offices.

## 2. OBJECTIVES OF THE AUDIT

This was a routine audit with three objectives. The first objective was to evaluate the performance of the CCA with respect to controls over the processing establishments certified by the CCA as eligible to export meat products to the United States. The second objective was to determine if appropriate corrective actions had been taken by Germany in response to deficiencies noted during the July 2003 audit. The third objective was to determine if the CCA had taken steps to strengthen Federal oversight of certified establishments.

In pursuit of the objectives, the following sites were visited: the headquarters of the CCA in Berlin, one State inspection office—Lower Saxony; one district inspection office within the State of Lower Saxony—Weser Ems, one local inspection office within the State of Lower Saxony—Ammerland, one government laboratory performing *Listeria monocytogenes* analysis on United States-destined product, and all five certified meat processing establishments.

Competent Authority Visits			Comments
Competent Authority	Central	1	
	State	1	
	District	1	
	Local	1	Establishment level
Laboratories		1	
Meat Processing Establishments		5	

## 3. PROTOCOL

This on-site audit was conducted in four parts. One part involved visits with CCA officials to discuss oversight programs and practices, including enforcement activities. The second part involved audits of selected state, district and local inspection offices responsible for the oversight of establishments certified for export to the United States. The third part involved on-site visits to five processing establishments. The fourth part involved a visit to one government laboratory LAVES, located in Oldenburg, which was conducting analyses for the presence of *Listeria monocytogenes*.

Program effectiveness determinations of Germany's inspection system focused on five areas of risk: (1) sanitation controls, including the implementation and operation of Sanitation Standard Operating Procedures, (2) animal disease controls, (3) processing controls, including the implementation and operation of HACCP programs, (4) residue controls, and (5) enforcement controls. Germany's inspection system was assessed by evaluating these five risk areas.

During all on-site establishment visits, the auditor evaluated the nature, extent and degree to which findings impacted on food safety and public health. The auditor also assessed how inspection services are carried out by Germany and also determined if establishment and inspection system controls were in place to ensure the production of meat products that are safe, unadulterated and properly labeled.

During the opening meeting, the auditor explained to the CCA that their inspection system would be audited in accordance with three areas of focus. First, under provisions of the European Community/United States Veterinary Equivalence Agreement (VEA), the FSIS auditors would audit the meat inspection system against European Commission Directive 64/433/EEC of June 1964; European Commission Directive 96/22/EC of April 1996; and European Commission Directive 96/23/EC of April 1996. These directives have been declared equivalent under the VEA.

Second, in areas not covered by these directives, the auditor would audit against FSIS requirements. These include daily inspection in all certified establishments, the handling and disposal of inedible and condemned materials, and FSIS' requirements for HACCP and SSOP.

Third, the auditor would audit against any equivalence determinations that have been made by FSIS for Germany under provisions of the Sanitary/Phytosanitary Agreement. There are no equivalence determinations pertaining to Germany at this time.

Germany does not have any certified slaughter establishments approved for export to the United States, therefore neither the establishments nor the inspection service are required to test for *Salmonella* or generic *Escherichia coli* (*E. coli*)

#### 4. LEGAL BASIS FOR THE AUDIT

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

- The Federal Meat Inspection Act (21 U.S.C. 601 et seq.).
- The Federal Meat Inspection Regulations (9 CFR Parts 301 to end), which include the Pathogen Reduction/HACCP regulations.



In addition, compliance with the following European Community Directives was also assessed:

- Council Directive 64/433/EEC, of June 1964, entitled “Health Problems Affecting Intra-Community Trade in Fresh Meat”
- Council Directive 96/23/EC, of 29 April 1996, entitled “Measures to Monitor Certain Substances and Residues Thereof in Live Animals and Animal Products”
- Council Directive 96/22/EC, of 29 April 1996, entitled “Prohibition on the Use in Stockfarming of Certain Substances Having a Hormonal or Thyrostatic Action and of B-agonists”

## 5. SUMMARY OF PREVIOUS AUDITS

Final audit reports are available on FSIS’ website at the following address:  
[http://www.fsis.usda.gov/Regulations\\_&\\_Policies/Foreign\\_Audit\\_Reports/index.asp](http://www.fsis.usda.gov/Regulations_&_Policies/Foreign_Audit_Reports/index.asp)

The last two audits of Germany’s inspection system had shown serious problems.

During the February 2003 audit, the following deficiencies were found:

- Control of condemned product was deficient in six establishments.
- Enforcement of U.S. requirements was lacking in six establishments.
- Violations of EC Directive 64/433 were found in six establishments.
- SSOP implementation was deficient in four establishments.
- SSOP corrective actions were deficient in one establishment.
- SSOP records were deficient in three establishments.
- HACCP verification was deficient in one establishment.
- HACCP records were deficient in two establishments.
- Cleaning of equipment and utensils was inadequate in one establishment.
- Sanitary operations were in need of improvement in five establishments.

During the July 2003 audit, the auditor found that the majority of the audit deficiencies had been corrected.

During the July 2003 audit, the following deficiencies were found:

- SSOP implementation was deficient in one establishment.
- SSOP records were deficient in this same establishment.
- Problems were noted with pest control in four establishments.
- Sanitary operations needed improvements in two establishments.
- Dirty, street and work clothes were stored in the same locker as clean working clothes in two establishments.
- Enforcement of FSIS or EC sanitation requirements was lacking in four of five establishments.

During this audit, the auditor found that all the audit deficiencies had been corrected.

## 6. MAIN FINDINGS

### 6.1 Legislation

The auditor was informed that the relevant EC Directives, determined equivalent under the VEA, had been transposed into Germany's legislation.

### 6.2 Government Oversight

The CCA for Germany is the Federal Office of Consumer Protection and Food Safety. Among other things, this office is responsible for all activities related to the export of meat products to other countries, including the certification and de-certification of establishments for export. This office is also responsible for verifying that appropriate corrective actions are taken when deficiencies are noted in establishments.

#### 6.2.1 CCA Control Systems

Although the CCA has no jurisdiction or direct authority over the 16 State Inspection Programs, the CCA is responsible for certifying and decertifying establishments for export and for verifying that necessary corrective actions have been carried out by establishments and inspection personnel. Each of the 16 States is divided into one or more Districts. The District Office controls, implements, and enforces Federal meat inspection regulations through the individual local offices.

#### 6.2.2 National Control and Supervision

The Federal Office of Consumer Protection and Food Safety is responsible for national control and supervision over official inspection activities for all establishments that export meat products, including the authority to certify and decertify establishments for such export.

#### 6.2.3 Assignment of Competent, Qualified Inspectors

Competent and qualified inspectors are assigned to certified establishments.

#### 6.2.4 Authority and Responsibility to Enforce the Laws

The CCA has the authority and responsibility to enforce the laws. This is evidenced by the actions the Federal Office of Consumer Protection and Food Safety has taken to develop and issue inspection guidelines which contain FSIS requirements. These guidelines have been implemented by all States that have certified establishments within their boundaries.

#### 6.2.5 Adequate Administrative and Technical Support

The CCA has the ability to support a third party audit.

### 6.3 Headquarters Audit

The auditor conducted a review of inspection-related documents at the Federal Office of Consumer Protection and Food Safety headquarters.

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

#### 6.3.1 Audit of State, District and Local Inspection Offices

The auditor interviewed inspection officials at several levels of the inspection program. Inspection officials were interviewed at one State inspection office—Lower Saxony; at one District inspection office within the State of Lower Saxony—Weser Ems; and one local inspection office within the State of Lower Saxony—Ammerland. The five currently certified establishments are all located within the State of Lower Saxony.

No concerns arose as a result of these interviews.

## 7. ESTABLISHMENT AUDITS

The FSIS auditor visited a total of five processing establishments. None of these establishments were delisted by Germany. None of these establishments received a notice of intent to delist from Germany.

## 8. RESIDUE AND MICROBIOLOGY LABORATORY AUDITS

During laboratory audits, emphasis is placed on the application of procedures and standards that are equivalent to United States requirements.

Microbiology laboratory audits focus on analyst qualifications, sample receipt, timely analysis, analytical methodologies, analytical controls, recording and reporting of results, and check samples.

The following laboratory was audited:

LAVES, a government laboratory located in Oldenburg, was performing microbiological analyses on product destined for the United States.

No deficiencies were noted.

## 9. SANITATION CONTROLS

As stated earlier, the FSIS auditor focuses on five areas of risk to assess an exporting country's meat inspection system. The first of these risk areas that the FSIS auditor reviewed was Sanitation Controls.

Based on the on-site audits of establishments, Germany's inspection system had controls in place for SSOP programs, all aspects of facility and equipment sanitation, the

prevention of actual or potential instances of product cross-contamination, good personal hygiene practices, and good product handling and storage practices.

In addition, Germany's inspection system had controls in place for water potability records, chlorination procedures, back-siphonage prevention, separation of operations, temperature control, work space, ventilation, welfare facilities, and outside premises.

## 9.1 SSOP

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOP were met, according to the criteria employed in the United States' domestic inspection program. The SSOP in all five establishments were found to meet the basic FSIS regulatory requirements.

## 9.2 EC Directive 64/433

In all establishments, the provisions of EC Directive 64/433 were effectively implemented.

## 10. ANIMAL DISEASE CONTROLS

The second of the five risk areas that the FSIS auditor reviewed was Animal Disease Controls. For processing establishments, these controls include ensuring control over restricted and inedible product and procedures for sanitary handling of returned and reconditioned product.

No deficiencies were noted.

There had been no outbreaks of animal diseases with public health significance since the last FSIS audit.

## 11. SLAUGHTER/PROCESSING CONTROLS

The third of the five risk areas that the FSIS auditor reviewed was Slaughter/Processing Controls. The controls include the following areas: ante-mortem inspection procedures, ante-mortem disposition, humane handling and humane slaughter, post-mortem inspection procedures, post-mortem disposition, ingredients identification, control of restricted ingredients, formulations, processing schedules, equipment and records, and processing controls of cured, dried, and cooked products. The controls also include the implementation of HACCP systems in all establishments.

### 11.1 Humane Handling and Humane Slaughter

At this time, there are no certified slaughter establishments eligible to export meat products to the United States.

## 11.2 HACCP Implementation

All establishments approved to export meat products to the United States are required to have developed and adequately implemented a HACCP program. Each of these programs was evaluated according to the criteria employed in the United States' domestic inspection program.

The HACCP programs were reviewed during the on-site audits of the five establishments. All five establishments had adequately implemented the HACCP requirements.

## 11.3 Testing for Generic *E. coli*

Germany does not have any certified slaughter establishment approved for export to the United States. Therefore, neither the establishments nor the inspection service is required to test for generic *E. coli*.

## 11.4 Testing for *Listeria monocytogenes*

All of the five establishments audited were producing ready-to-eat products for export to the United States. In accordance with FSIS requirements, the HACCP plans in these establishments had been reassessed to include *Listeria monocytogenes* as a hazard reasonably likely to exist.

## 11.5 EC Directive 64/433

In all establishments, the provisions of EC Directive 64/433 were effectively implemented.

## 12. RESIDUE CONTROLS

The fourth of the five risk areas that the FSIS auditor reviewed was Residue Controls. These controls include sample handling and frequency, timely analysis, data reporting, tissue matrices for analysis, equipment operation and printouts, minimum detection levels, recovery frequency, percent recoveries, and corrective actions.

No residue laboratory was visited during this audit.

### 12.1 FSIS Requirements

At the time of this audit, no German slaughter establishments were certified for United States export. All raw product is obtained from approved slaughter establishments in Denmark and therefore residue controls were enforced at the Denmark slaughter establishments.

## 12.2 EC Directive 96/22

No residue laboratories were audited.

## 12.3 EC Directive 96/23

No residue laboratories were audited.

## 13. ENFORCEMENT CONTROLS

The fifth of the five risk areas that the FSIS auditor reviewed was Enforcement Controls. These controls include the enforcement of inspection requirements and the testing program for *Salmonella*.

No deficiencies were observed during this audit.

### 13.1 Daily Inspection

Inspection was being conducted daily in all processing establishments.

### 13.2 Testing for *Salmonella*

Germany does not have any slaughter establishment approved for export to the United States. Therefore, neither the establishments nor the inspection service is required to test for *Salmonella*.

### 13.3 Species Verification

At the time of this audit, Germany was required to test product for species verification. Species verification was being conducted in those establishments in which it was required.

### 13.4 Monthly Reviews

During this audit it was found that in all establishments visited, monthly supervisory reviews of certified establishments were being performed and documented as required.

### 13.5 Inspection System Controls

The CCA had controls in place for prevention of commingling of product intended for export to the United States with product intended for the domestic market.

In addition, controls were in place for the importation of only eligible livestock from other countries, i.e., only from eligible third countries and certified establishments within those countries, and the importation of only eligible meat products from other countries for further processing.

Lastly, adequate controls were found to be in place for security items, shipment security, and products entering the establishments from outside sources.

#### 14. CLOSING MEETING

A closing meeting was held on May 27, 2004, in Berlin with the CCA. At this meeting, the primary findings and conclusions from the audit were presented by the auditor.

Dr. Farooq Ahmad  
International Audit Staff Officer

Farooq Ahmad  
9/27/04

## 15. ATTACHMENTS TO THE AUDIT REPORT

Individual Foreign Establishment Audit Forms

Individual Foreign Laboratory Audit Form

Foreign Country Response to Draft Final Audit Report



REVIEW DATE  
 May 14, 2004

NAME OF FOREIGN LABORATORY  
 LAVES Veterinary Institute

FOREIGN COUNTRY LABORATORY REVIEW

FOREIGN GOVT AGENCY  
 Microbiology Laboratory

CITY & COUNTRY  
 Oldenburg, Germany

ADDRESS OF LABORATORY  
 28135 Oldenburg

NAME OF REVIEWER  
 Dr. Farooq Ahmad

NAME OF FOREIGN OFFICIAL  
 -----

Residue Code/Name			Lis	Sal																
SAMPLING PROCEDURES	REVIEW ITEMS	ITEM #	EVALUATION CODE																	
	Sample Handling	01		A	A															
	Sample Frequency	02		A	A															
	Timely Analysis	03		A	A															
	Compositing Procedure	04		O	O															
	Interpret Comp Data	05		O	O															
Data Reporting	06	A	A																	
ANALYTICAL PROCEDURES	Acceptable Method	07	EVALUATION CODE	A	A															
	Correct Tissue(s)	08		A	A															
	Equipment Operation	09		A	A															
	Instrument Printouts	10		A	A															
QUALITY ASSURANCE PROCEDURES	Minimum Detection Levels	11	EVALUATION CODE	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	A	A																	
REVIEW	Corrected Prior Deficiencies	18	EVAL. CODE	O	O															
OTHER REVIEW		19	EVAL. CODE																	
		20																		

Signature of reviewer *Farooq Ahmad* DVM

Date 6/21/04

United States Department of Agriculture  
Food Safety and Inspection Service

## Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION  Meica Meat Packing Plant of Ammerland Edeweicht	2. AUDIT DATE May 24, 2004	3. ESTABLISHMENT NO. A-TV-10	4. NAME OF COUNTRY Germany
5. NAME OF AUDITOR(S) Dr. Farooq Ahmad		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	

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

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements		Part E - Other Requirements	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements		40. Light	
14. Developed and implemented a written HACCP plan.		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		Part F - Inspection Requirements	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
Part C - Economic / Wholesomeness		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	
24. Labeling - Net Weights		52. Humane Handling	O
25. General Labeling		53. Animal Identification	O
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	O
Part D - Sampling Generic E. coli Testing		55. Post Mortem Inspection	O
27. Written Procedures	O	Part G - Other Regulatory Oversight Requirements	
28. Sample Collection/Analysis	O	56. European Community Directives	
29. Records	O	57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions	O	59.	
31. Reassessment	O		
32. Written Assurance	O		

60. Observation of the Establishment

Germany- Est. # A-IV-10 (Processing) Date of audit: 05/24/2004

61. NAME OF AUDITOR

Dr. Farooq Ahmad

62. AUDITOR SIGNATURE AND DATE

*Farooq Ahmad DM 6/21/04*

### Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Abraham Brothers GmbH Seevetal Seevetal	2. AUDIT DATE May 25, 2004	3. ESTABLISHMENT NO. A-IV-22	4. NAME OF COUNTRY Germany
5. NAME OF AUDITOR(S) Dr. Farooq Ahmad		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	

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

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
<b>Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements</b>		<b>Part E - Other Requirements</b>	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	
<b>Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements</b>		40. Light	
14. Developed and implemented a written HACCP plan.		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
<b>Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements</b>		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		<b>Part F - Inspection Requirements</b>	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
<b>Part C - Economic / Wholesomeness</b>		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	
24. Labeling - Net Weights		52. Humane Handling	O
25. General Labeling		53. Animal Identification	O
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	O
<b>Part D - Sampling Generic E. coli Testing</b>		55. Post Mortem inspection	O
27. Written Procedures	O	<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis	O	56. European Community Directives	
29. Records	O	57. Monthly Review	
<b>Salmonella Performance Standards - Basic Requirements</b>		58.	
30. Corrective Actions	O	59.	
31. Reassessment	O		
32. Written Assurance	O		

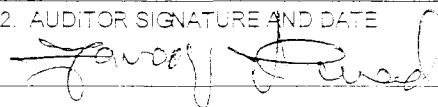
60. Observation of the Establishment

Germany- Est. # A-IV-22 (Processing) Date of audit: 05/25/2004

61. NAME OF AUDITOR

Dr. Farooq Ahmad

62. AUDITOR SIGNATURE AND DATE

 6/21/04

### Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Klumper GmbH & Company KG Schutterf	2. AUDIT DATE May 18, 2004	3. ESTABLISHMENT NO. A-EV-29	4. NAME OF COUNTRY Germany
5. NAME OF AUDITOR(S) Dr. Farooq Ahmad		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	


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

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
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<b>Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements</b>		45. Equipment and Utensils	
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22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
<b>Part C - Economic / Wholesomeness</b>		50. Daily inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	
24. Labeling - Net Weights		52. Humane Handling	O
25. General Labeling		53. Animal Identification	O
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	O
<b>Part D - Sampling Generic E. coli Testing</b>		55. Post Mortem Inspection	O
27. Written Procedures	O	<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis	O	56. European Community Directives	
29. Records	O	57. Monthly Review	
<b>Salmonella Performance Standards - Basic Requirements</b>		58.	
30. Corrective Actions	O	59.	
31. Reassessment	O		
32. Written Assurance	O		

60. Observation of the Establishment

Germany- Est. # A-EV-29 (Processing) Date of Audit: 05/18/2004

61. NAME OF AUDITOR  
Dr. Ferood Ahmad

62. AUDITOR SIGNATURE AND DATE  
 DM 6/21/04

United States Department of Agriculture  
Food Safety and Inspection Service

## Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION  Abraham Ammeriaender Ham GmbH & Company KG Edewecht	2. AUDIT DATE May 19, 2004	3. ESTABLISHMENT NO. A-EV-35	4. NAME OF COUNTRY Germany
5. NAME OF AUDITOR(S)  Dr. Farooq Ahmad		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	

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

<b>Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements</b>	Audit Results	<b>Part D - Continued Economic Sampling</b>	Audit Results
7. Written SSOP		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
<b>Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements</b>		<b>Part E - Other Requirements</b>	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	
<b>Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements</b>		40. Light	
14. Developed and implemented a written HACCP plan.		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
<b>Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements</b>		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		<b>Part F - Inspection Requirements</b>	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
<b>Part C - Economic / Wholesomeness</b>		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	
24. Labeling - Net Weights		52. Humane Handling	O
25. General Labeling		53. Animal Identification	O
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	O
<b>Part D - Sampling Generic E. coli Testing</b>		55. Post Mortem Inspection	O
27. Written Procedures	O	<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis	O	56. European Community Directives	
29. Records	O	57. Monthly Review	
<b>Salmonella Performance Standards - Basic Requirements</b>		58.	
30. Corrective Actions	O	59.	
31. Reassessment	O		
32. Written Assurance	O		




60. Observation of the Establishment:

Germany- Est. # A-EV-35 (Processing) Date of audit: 05/19/2004

61. NAME OF AUDITOR

Dr. Farooq Ahmad

62. AUDITOR SIGNATURE AND DATE

 6/21/04

United States Department of Agriculture  
Food Safety and Inspection Service

## Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION  Abraham Ham GmbH and Company KG Barssel-Farkebruegge	2. AUDIT DATE May 17, 2004	3. ESTABLISHMENT NO. A-IV-191	4. NAME OF COUNTRY Germany
5. NAME OF AUDITOR(S) Dr. Farooq Ahmad		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	

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

<b>Part A - Sanitation Standard Operating Procedures (SSOP)</b> <b>Basic Requirements</b>	Audit Results	<b>Part D - Continued Economic Sampling</b>	Audit Results
7. Written SSOP		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
<b>Sanitation Standard Operating Procedures (SSOP)</b> <b>Ongoing Requirements</b>		<b>Part E - Other Requirements</b>	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	
<b>Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements</b>		40. Light	
14. Developed and implemented a written HACCP plan.		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
<b>Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements</b>		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		<b>Part F - Inspection Requirements</b>	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
<b>Part C - Economic / Wholesomeness</b>		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	
24. Labeling - Net Weights		52. Humane Handling	O
25. General Labeling		53. Animal Identification	O
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	O
<b>Part D - Sampling</b> <b>Generic E. coli Testing</b>		55. Post Mortem Inspection	O
27. Written Procedures	O	<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis	O	56. European Community Directives	
29. Records	O	57. Monthly Review	
<b>Salmonella Performance Standards - Basic Requirements</b>		58.	
30. Corrective Actions	O	59.	
31. Reassessment	O		
32. Written Assurance	O		

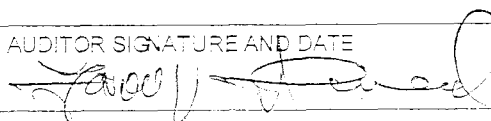
60. Observation of the Establishment

Germany- EST. # A-IV-191 (Processing) Date of Audit: 05/17/2004

61. NAME OF AUDITOR

Dr. Farooq Ahmad

62. AUDITOR SIGNATURE AND DATE

 6/21/04



Bundesamt für  
Verbraucherschutz und  
Lebensmittelsicherheit

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INTERNET http://www.bvl.bund.de

REFERENCE 5105-00/205606  
(please quote in response)

YOUR REFERENCE/ Note dated July 14, 2004  
YOUR NOTE FROM via USDA Mission Berlin dated July 15,  
2004  
DATE September 7, 2004

2004/041761

Bundesministerium für Verbraucherschutz,  
Ernährung und Landwirtschaft  
Posteingang

Eing. - 9. Sep. 2004

Abt./Ref. 329

Az.: 129-9411-USA/0000

Comments to the FSIS draft final report of a meat inspection system audit conducted in Germany from May 12 through May 27, 2004.

Dear Ms White,

I am very pleased with the conclusions of the above mentioned report. The encouraging outcome of the audit is strongly stimulating German competent authorities to continue their efforts to ensure that the US meat inspection requirements are met.

The only comment I have to the draft final report has been discussed already during the closing meeting of the audit with the participation of Ms Stratmoen of FSIS and Mr Terzi of the European Commission: According to my understanding of the US-EC Agreement, the legal base of the audit should be Directive 77/99/EEC and not Directive 64/433/EEC.

I take the opportunity to ask whether you could name US suppliers for reference material for the FSIS method "Isolation and identification of *Listeria Monocytogenes* from red meat, poultry, egg and environmental samples" (FSIS Microbiology Laboratory Guidebook, MLG

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D-12277 Berlin-Marienfelde  
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Bonn  
Rochusstraße 65  
D-53123 Bonn  
Tel: +49 (0) 228 6198-0  
Fax: +49 (0) 228 6198-120

Braunschweig  
Messeweg 11/12  
D-38104 Braunschweig  
Tel: +49 (0) 531 299-6  
Fax: +49 (0) 531 299-3002

8.03). Our laboratories need reference material containing 1 cfu/g in a 25 g-sample. I would very much appreciate any information to this end.

Yours sincerely,



Dr. K.W. Bögl