United States Department of Agriculture
Food Safety and Inspection Service
Washington, D.C. 20250

DEC 8 2004

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

Dear Mr. Gibbens:

The Food Safety and Inspection Service (FSIS) conducted an on-site audit of Great Britain's meat inspection system from March 31 – April 16, 2004. Enclosed is the final audit report. Attached to the report is your letter of September 16, 2004, commenting on the draft final report of the same audit.

We appreciate the actions taken by Great Britain to correct the deficiencies identified during the audit. If you have any questions regarding the FSIS audit, please contact me at my telephone number (202) 720-3781. You may also reach me at my facsimile number (202) 690-4040 or email address sally.white@fsis.usda.gov.

Sincerely,

Sally White

Sally White, Director
International Equivalence Staff
Office of International Affairs

Enclosure

cc:
Peter Kurz, Minister Counselor, American Embassy London
James Hughes, Agricultural Attaché, British Embassy, Washington, DC
Tony Van der haegen, EU Mission to the U.S.
Norval Francis, Minister-Counselor, US Mission to the EU in Brussels
Scott Bleggi, FAS Area Officer
Dave Young, ITP, FAS
Amy Winton, State Department
Barbara Masters, Acting Administrator, FSIS
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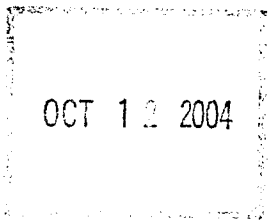
Jack Mowbray, IES, OIA, FSIS
Mary Stanley, Director, IID, OIA, FSIS
Country File

FINAL



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

MARCH 31 THROUGH APRIL 16, 2004

Food Safety and Inspection Service
United States Department of Agriculture

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14. CLOSING MEETING

15. ATTACHMENTS TO THE AUDIT REPORT

ABBREVIATIONS AND SPECIAL TERMS USED IN THE REPORT

CCA	Central Competent Authority [Department for Environment, Food and Rural Affairs]
DEFRA	Department for Environment, Food and Rural Affairs
EC	European Commission
FSA	Food Standards Agency
MHS	Meat Hygiene Service
VPHOD	Veterinary Public Health Operations Division (of the FSA)
VMHA	Veterinary Meat Hygiene Adviser
VMD	Veterinary Medicines Directorate
OVS	Official Veterinary Surgeon
FSIS	Food Safety and Inspection Service
VEA	European Community/United States Veterinary Equivalence Agreement
PR/HACCP	Pathogen Reduction/Hazard Analysis and Critical Control Point Systems
RVA	Regional Veterinary Adviser
SSOP	Sanitation Standard Operating Procedures
SPS	Sanitation Performance Standards
E. coli	*Escherichia coli*
Salmonella	*Salmonella* species
Listeria	*Listeria monocytogenes*

1. INTRODUCTION

The audit took place in Great Britain from March 31 to April 16, 2004.

An opening meeting was held on March 31, 2004, in London with the Central Competent Authority (CCA). At this meeting, the auditors confirmed the objective and scope of the audit, the audit itinerary, and requested additional information needed to complete the audit of Great Britain's meat inspection system.

The auditors were accompanied during the entire audit by representatives from the CCA (Department for Environment, Food and Rural Affairs) and/or representatives from the regional and district inspection offices.

2. OBJECTIVE OF THE AUDIT

This audit was a routine annual audit. The objective of the audit was to evaluate the performance of the CCA with respect to controls over the slaughter and processing establishments certified by the CCA as eligible to export meat products to the United States.

In pursuit of the objective, the following sites were visited: headquarters, one regional inspection office, two laboratories performing analytical testing on United States destined product, one swine slaughter/processing establishment, and one cold storage facility.

Competent Authority Visits	Headquarters	1	DEFRA office in London
Competent Authority	Region	1	MHS regional office in York
Competent Authority	Local	2	Establishment Level
Laboratories		2	
Swine slaughter/processing establishment		1	
Cold Storage Facility		1	

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 an audit of a selection of records in the country's inspection headquarters or regional offices. The third part involved on-site visits to two establishments: one slaughter/processing establishment and one cold storage facility. The fourth part involved visits to two private laboratories. The Allied Laboratory Services Limited was conducting analyses of field samples for the presence of generic *Escherichia coli* (*E. coli*) and *Salmonella*. The Laboratory of the Government Chemist was conducting analyses of field samples for Great Britain's national residue control program.

Program effectiveness determinations of Great Britain'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) slaughter/processing controls, including the implementation and operation of HACCP programs and a testing program for generic *E. coli*, (4) residue controls, and (5) enforcement controls, including a testing program for *Salmonella*. Great Britain's inspection system was assessed by evaluating these five risk areas.

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

At the opening meeting, the auditors 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 auditor 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 by FSIS under the VEA.

Second, in areas not covered by these directives, the auditors would audit against FSIS requirements. FSIS requirements include daily inspection in all certified establishments, humane handling and slaughter of animals, the handling and disposal of inedible and condemned materials, species verification testing, and requirements for HACCP, SSOP, testing for generic *E. coli* and *Salmonella*.

Third, the auditors would audit against any equivalence determinations that have been made by FSIS for Great Britain under provisions of the Sanitary/Phytosanitary Agreement.

Currently, Great Britain has an equivalence determination from FSIS regarding their *Salmonella* testing program. These differences can be reviewed under Section 13.2 of this report.

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://199.140.65.44/regulations_&_policies/Foreign_Audit_Reports/index.asp

The following deficiencies were identified during the FSIS audit of Great Britain's meat inspection system conducted in February 2002. A Notice of Intent to Delist (NOID) for inadequate implementation of SSOP was given to one of the three establishments audited.

- The written SSOP procedures did not indicate any preventive measures as part of corrective actions in two of the three establishments.
- HACCP implementation problems were found in one establishment.
- Post-mortem inspection procedures were incomplete in one establishment.
- Condensation controls were inadequate in two establishments.
- Sanitary dressing procedures were inadequate in one establishment.
- Grease from rail and other sources was observed on several carcasses and in boxed trimmings in one of three establishments.
- Containers for condemned product were not identified in one establishment.
- One establishment was using the sponge method for sampling carcasses for generic *E. coli* but did not evaluate the test results using statistical process control techniques.

The following deficiencies were identified during the FSIS audit of Great Britain's meat inspection system conducted in March 2003. A NOID for inadequate implementation of SSOP and HACCP programs was given to one of the two establishments audited.

- One establishment was not adequately documenting daily operational sanitation monitoring (records were maintained once a week only). Another establishment was not maintaining records for pre-operational sanitation.
- One establishment did not have adequate controls in place to prevent the entry of rodents and other vermin in the dry storage room.
- The records documenting on-going verification (such as the calibration of process-monitoring instruments, direct observations of monitoring activities, and corrective actions) were not adequately maintained by the establishment.
- The records were not maintained at the identified critical control point for the monitoring CCP for zero tolerance for fecal materials. The entries were not made at the time the deviation occurred, and did not include the time, signature/initials

and corrective actions taken in response to a deviation of critical limits by the responsible establishment employee.

6. MAIN FINDINGS

6.1 Legislation

The auditors were informed that the relevant EC Directives, determined equivalent under the VEA, had been transposed into Great Britain's legislation.

6.2 Government Oversight

6.2.1 CCA Control Systems

The CCA, the Department for the Environment, Food and Rural Affairs (DEFRA), is responsible for trade with countries outside the EU (including the U.S.). DEFRA carries out all communications with FSIS and will communicate official instructions to establishments certified to export to the United States. The International Animal Health Division of DEFRA has a working agreement with the Veterinary Public Health Operations Division (VPHOD) of the Food Standards Agency (FSA). FSA carries out the practical inspections and make recommendations for approval or de-listing to DEFRA, and ensures the correct application of FSIS requirements in the establishments. This function is performed by the Veterinary Meat Hygiene Advisors (VMHA) from the VPHOD of the FSA. There are eight VMHA in England, each one covering a specified area of the country. The Working Agreement with DEFRA states that the implementation of FSIS requirements is the responsibility of the VMHA and therefore all communication between DEFRA International Animal Health Division and the VPHOD of the FSA is directly to the VMHA. 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 officials veterinarians assigned to the two establishments currently certified to export to the United States are on contract to MHS. The Veterinarian contracts are reviewed annually and renewed every three years by FSA. The FSA has the authority to cancel the contracts with veterinarians at any time deemed necessary. The Chief Executive of the MHS reports to the FSA Director of Enforcement and it is agreed that instructions for the plant Official Veterinarian (OV) and Regional Veterinary Adviser (RVA) in relation to FSIS requirements will come directly from the VMHA. The official veterinarians and inspectors report directly to the RVAs, which are stationed throughout Great Britain.

6.2.2 Ultimate Control and Supervision

DEFRA, as the CCA, has the authority to remove establishments from the list of establishments certified to export to the U.S., and refuse the issuance of veterinary health certificates to prohibit exports from taking place. The decision as to whether the establishment is failing to meet U.S. requirements and the recommendation that de-listing should occur is the responsibility of the VMHA, who would reach his/her decision after

considering reports from the OV and the RVA and carrying out an audit of the establishment.

6.2.3 Assignment of Competent, Qualified Inspectors

All veterinarians and meat inspectors working in Great Britain's establishments must be fully qualified in accordance with legislative and instructional requirements. Veterinarians have to attend an intensive two-week training course as well as participate in on-the-job training with experienced veterinarians. Meat Inspectors must undergo training in accordance with the requirements of EU Directive 64/433/EEC, Annex III for veterinary auxiliaries (400 hours theoretical and 200 hours practical instructions) and must have passed an examination before being authorized to work in meat establishments. Since the adoption of EU Commission Decision 2001/471/EC requiring the introduction of controls based on HACCP Principles, the MHS has initiated a program of HACCP training for all its employees.

- Training programs for inspectors in PR/HACCP and SSOP system implementation, *E. coli*, *Salmonella*, and *Listeria monocytogenes* testing were conducted since the last audit.

6.2.4 Authority and Responsibility to Enforce the Laws

DEFRA, as the CCA, can remove establishments certified to export to the United States if FSIS requirements are not met. Monitoring of these requirements is carried out by VMHA and RVA from the MHS under the requisite schedule of visits (annually by the VMHA and monthly by the RVA when exports are taking place). Additional visits are carried out as necessary when there are adverse reports from the plant OV. De-listing would be carried out by DEFRA International Animal Health Division on a recommendation from the VMHA.

MHS has the authority and responsibility to enforce the applicable laws relevant to U.S. certified establishments. The Regional Veterinary Advisers (RVAs) are in charge of verifying and evaluating the implementation of the official directives, guidelines and instructions. The following deficiencies were noted:

- In one of the two establishments, the FSIS/EC regulatory requirements were not enforced adequately by the CCA. Post-mortem inspection procedures were incomplete in one establishment.

6.2.5 Adequate Administrative and Technical Support

During the audit, the auditors found that the CCA has administrative and technical support to operate Great Britain's inspection system and has the resources and ability to support a third-party audit.

6.3 Headquarters Audit

The auditors conducted a review of inspection system documents at the headquarters in London. The records review focused primarily on food safety hazards and included the following:

- Internal review reports.
- Supervisory visits to establishments that were certified to export to the U.S.
- Training records for inspectors and laboratory personnel.
- New laws and implementation documents such as regulations, notices, directives and guidelines.
- Sampling and laboratory analyses for residues.
- Sanitation, slaughter and processing inspection procedures and standards.
- Control of inedible and condemned materials.
- Export product inspection and control including export certificates.
- Enforcement records, including examples of control of noncompliant product, and withholding, suspending, withdrawing inspection services from or delisting an establishment that is certified to export product to the United States.

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

6.3.1 Audit of Regional Inspection Site

Regional Offices

The FSIS audit team reviewed one regional Meat Hygiene Service (MHS) office in York and interviewed the regional director. The purpose of the interview was to review the meat inspection records and determine the level of government oversight and control provided by the regional offices relative to the certified establishments.

The audit team concluded that:

- All relevant regulations, notices, and other inspection documents and records were adequately disseminated from headquarters through the regional offices to the two certified establishments (local inspection sites). This was accomplished by both hard copy and e-mails.
- Copies of all relevant regulations, notices, and other inspection documents and records were maintained at the regional offices.
- POV supervisor was knowledgeable of U.S. import requirements relative to the two certified establishments producing or exporting meat to the United States.
- The regional official demonstrated adequate administrative assistance to ensure that official inspection personnel were assigned to the two certified establishments.
- Records for training programs for inspectors in PR/HACCP and SSOP system implementation, *E. coli*, *Salmonella*, and *Listeria monocytogenes* testing were reviewed.

The auditors found that the instructions had been received and implemented by the regional office visited.

Local Inspection Sites (Certified Establishments)

The FSIS audit team reviewed Great Britain's meat inspection records maintained at the local inspection sites certified to produce or export meat to the United States. In addition, the audit team interviewed the senior veterinarians (OVs) at each establishment and their inspection teams, which consisted of veterinary officers, senior meat inspectors and meat inspectors.

The audit team concluded that:

- All relevant regulations, notices, and other inspection documents and records were adequately disseminated from headquarters through the regional offices to the two local inspection sites. This was accomplished by both hard copy and e-mails.
- Inspection personnel demonstrated adequate knowledge of inspection requirements relative to the export and distribution of meat to the United States.

7. ESTABLISHMENT AUDITS

The FSIS auditors visited a total of two establishments. One was a slaughter/processing establishment and one was a cold storage facility. No establishments were delisted by DEFRA.

Specific deficiencies are noted on the attached individual establishment reports.

8. RESIDUE AND MICROBIOLOGY LABORATORY AUDITS

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

Residue laboratory audits focus on sample handling, sampling frequency, timely analysis data reporting, analytical methodologies, tissue matrices, equipment operation and printouts, detection levels, recovery frequency, percent recoveries, intra-laboratory check samples, and quality assurance programs, including standards books and corrective actions.

Microbiology laboratory audits focus on analyst qualifications, sample receipt, timely analysis, analytical methodologies, analytical controls, recording and reporting of results, and check samples. If private laboratories are used to test United States samples, the auditors evaluated compliance with the criteria established for the use of private laboratories under the PR/HACCP requirements.

The following laboratories were reviewed:

- The Laboratory of the Government Chemist is a private laboratory, located in Middlesex, which conducts analyses of field samples for Great Britain's national residue control program.
- The Allied Laboratory Services Limited is a private laboratory, located in Grimsby, which conducts analyses of field samples for the presence of *Salmonella* species and generic *Escherichia coli* (*E .coli*)

The findings at the Laboratory of the Government Chemist and the Allied Laboratory Services Limited will be discussed in Section 12 (Residue Controls).

9. SANITATION CONTROLS

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

Based on the on-site audits of establishments, and except as noted below, Great Britain'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 and practices, and good product handling and storage practices.

In addition, and except as noted below, Great Britain's inspection system had controls in place for water potability records, chlorination procedures, back-siphonage prevention, separation of operations, temperature control, work space, ventilation, ante-mortem facilities, 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 the both establishments were found to meet the basic FSIS regulatory requirements. The Sanitation Performance Standards (SPS) were not effectively implemented in one of the two establishments audited.

- In one establishment, receptacles (plastic bins) used for storing edible products were not conspicuously and distinctively identified. A few of these receptacles were being used for discarded packaging materials in the processing, cut-up and boning rooms.

9.2 EC Directive 64/433

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

In both establishments, the specific deficiencies are noted in the attached individual establishment reports.

10. ANIMAL DISEASE CONTROLS

The second of the five risk areas that the FSIS auditors reviewed was Animal Disease Controls. These controls include ensuring adequate animal identification, control over condemned and restricted product, and procedures for sanitary handling of returned and reconditioned product. The auditors determined that Great Britain's inspection system had adequate controls in place. No deficiencies were noted.

There had been no outbreaks of animal diseases with public health significance since the last FSIS audit. APHIS declared Great Britain free of Rinderpest and FMD effective December 17, 2002, although subject to special export conditions. APHIS also declared Great Britain free of Swine Vesicular Disease.

Importation of beef or beef products was not allowed into the United States from Great Britain at the time of this audit due to the presence of BSE in the United Kingdom.

11. SLAUGHTER/PROCESSING CONTROLS

The third of the five risk areas that the FSIS auditors 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 and implementation of a testing program for generic *E. coli* in slaughter establishments.

11.1 Humane Handling and Humane Slaughter

No deficiencies were noted.

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 audit of the slaughter/processing establishment. One establishment was a cold storage facility and was not required to have a HACCP program. The establishment that was required to meet the HACCP program requirements had adequately implemented the HACCP requirements.

11.3 Testing for Generic *E. coli*

Great Britain has adopted the FSIS regulatory requirements for testing for generic *E. coli.*

One of the two establishments audited was required to meet the basic FSIS regulatory requirements for testing for generic *E. coli* and was evaluated according to the criteria employed in the United States' domestic inspection program.

Testing for generic *E. coli* was properly conducted in this establishment and no deficiencies were noted.

11.4 Testing for *Listeria monocytogenes*

Both establishments audited were not producing ready-to-eat products for export to the United States and were not required to meet the FSIS requirements for *Listeria monocytogenes* testing. Great Britain is only exporting fresh pork ribs to the United States.

11.5 EC Directive 64/433

In the one slaughter establishment audited, the provisions of EC Directive 64/433 were not implemented adequately.

- The Meat Hygiene Service (MHS) inspectors were not palpating swine lungs and livers and were not incising and observing mandibular lymph nodes properly.

12. RESIDUE CONTROLS

The fourth of the five risk areas that the FSIS auditors 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.

The Laboratory of the Government Chemist, located in Middlesex (London), is a private laboratory. No deficiencies were noted.

Great Britain's National Residue Control Program for 2004 was being followed and was on schedule.

12.1 FSIS Requirements

Great Britain inspection officials had adequate controls in place to ensure compliance with sampling and reporting procedures and storage and use of chemicals. The methods used for the analyses were acceptable except in the Reference Laboratory of the Government Chemist.

12.2 EC Directive 96/22

In the Laboratory of the Government Chemist, the provisions of EC Directive 96/22 were effectively implemented.

12.3 EC Directive 96/23

In the Laboratory of the Government Chemist, the provisions of EC Directive 96/23 were effectively implemented.

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*.

- In one of the two establishments, the FSIS/EC regulatory requirements were not adequately enforced by the CCA.

13.1 Daily Inspection in Establishments

Inspection was being conducted daily in all slaughter and processing establishments.

13.2 Testing for *Salmonella*

Great Britain has adopted the FSIS requirements for testing for *Salmonella* with the exception of the following equivalent measure(s).

- Establishment takes samples.
- Private laboratory analyzes samples.

One of the two establishments audited was required to meet the basic FSIS regulatory requirements for *Salmonella* testing and was evaluated according to the criteria employed in the United States' domestic inspection program.

Salmonella testing was properly conducted in this establishment. However, the following deficiencies were noted in the analysis of *Salmonella* samples at the laboratory:

- The Department of Environment Food and Rural Affairs (DEFRA) had initially adopted the ISO Method 6579 for *Salmonella* testing but the laboratory modified the method in May 2003 without notifying the DEFRA. The DEFRA officials instructed the laboratory not to use modified method and start using the ISO Method 6579 immediately. DEFRA is in process of submitting the modified method to the Office of International Affairs (OIA), FSIS, for equivalency determination.

13.3 Species Verification

Great Britain is required to conduct species verification testing. No deficiencies were noted.

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 ante-mortem and post-mortem inspection procedures and dispositions, with the exception of the deficiency noted in Section 11.5; restricted product and inspection samples; disposition of dead, dying, diseased or disabled animals; shipment security, including shipment between establishments; and 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 meat products from other counties for further processing.

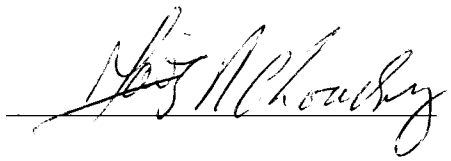
Lastly, adequate controls were found to be in place for security items, shipment security, and products entering the establishments from outside sources.

14. CLOSING MEETING

A closing meeting was held on April 16, 2004, in London with the CCA and by teleconference with a member of the European Commission in Brussels on April 29, 2004. At these meetings, the primary findings and conclusions from the audit were presented by the auditor.

The CCA understood and accepted the findings.

Faizur R. Choudry, DVM
International Audit Staff Officer



15. ATTACHMENTS TO THE AUDIT REPORT

Individual Foreign Establishment Audit Forms
Individual Foreign Laboratory Audit Forms
Foreign Country Response to Draft Final Audit Report

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

FOREIGN COUNTRY LABORATORY REVIEW

REVIEW DATE	NAME OF FOREIGN LABORATORY
04/01,02/04	Laboratory of the Government Chemist.

FOREIGN GOV'T AGENCY	CITY & COUNTRY	ADDRESS OF LABORATORY
Private	Middlesex, Breat Britain	Queens Road Teddington, Middlesex TW 11 OLY, UK

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL
Dr. Faiz R. Choudry, DVM	Dr. Jack F Kay, Residues, Surveillance & Mr. John Day, Group Quality Manager

	Residue Code/Name ▶			100	111	200	203	300	400	500	800	910	923		
	REVIEW ITEMS	ITEM #													
SAMPLING PROCEDURES	Sample Handling	01	EVALUATION CODE	A	A	A	A	A	A	A	A	A	A		
	Sampling Frequency	02		A	A	A	A	A	A	A	A	A	A		
	Timely Analyses	03		A	A	A	A	A	A	A	A	A	A		
	Compositing Procedure	04		O	O	O	O	O	O	O	O	O	O		
	Interpret Comp Data	05		O	O	O	O	O	O	O	O	O	O		
	Data Reporting	06		A	A	A	A	A	A	A	A	A	A		
ANALYTICAL PROCEDURES	Acceptable Method	07	EVALUATION CODE	A	A	A	A	A	A	A	A	A	A		
	Correct Tissue(s)	08		A	A	A	A	A	A	A	A	A	A		
	Equipment Operation	09		A	A	A	A	A	A	A	A	A	A		
	Instrument Printouts	10		A	A	A	A	A	A	A	A	A	A		
QUALITY ASSURANCE PROCEDURES	Minimum Detection Levels	11	EVALUATION CODE	A	A	A	A	A	A	A	A	A	A		
	Recovery Frequency	12		A	A	A	A	A	A	A	A	A	A		
	Percent Recovery	13		A	A	A	A	A	A	A	A	A	A		
	Check Sample Frequency	14		A	A	A	A	A	A	A	A	A	A		
	All analyst w/Check Samples	15		A	A	A	A	A	A	A	A	A	A		
	Corrective Actions	16		A	A	A	A	A	A	A	A	A	A		
	International Check Samples	17		A	A	A	A	A	A	A	A	A	A		
REVIEW	Corrected Prior Deficiencies	18	EVAL. CODE	A	A	A	A	A	A	A	A	A	A		
OTHER REVIEW		19	EVAL. CODE												
		20													

SIGNATURE OF REVIEWER: Faiz R Choudry

DATE: 05/01/04

FOREIGN COUNTRY LABORATORY REVIEW *(Comment Sheet)*	REVIEW DATE	NAME OF FOREIGN LABORATORY
	04/01,02/04	Laboratory of the Government Chemist.

FOREIGN GOV'T AGENCY	CITY & COUNTRY	ADDRESS OF LABORATORY
Private	Middlesex, Breat Britain	Queens Road Teddington, Middlesex TW 11 OLY, UK

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL
Dr. Faiz R. Choudry, DVM	Dr. Jack F Kay, Residues, Surveillance & Mr. John Day, Group Quality Manager

RESIDUE	ITEM NO.	COMMENTS

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

FOREIGN COUNTRY LABORATORY REVIEW

REVIEW DATE	NAME OF FOREIGN LABORATORY
04/06/04	Allied Laboratory Services Ltd.

FOREIGN GOV'T AGENCY	CITY & COUNTRY	ADDRESS OF LABORATORY
Private	Grimsby, Great Britain	The Technical Center , Wickham Road, Grimsby North East Lincolnshire

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL
Dr. F. Choudry & Dr. M. Chaudry	Alistair J. Booth BVMS, MSc. MRCVS, Veterinary Meat Hygiene Advisor

	REVIEW ITEMS	ITEM #	EVALUATION CODE	E.co	Sal
	Residue Code/Name ▶			E.co	Sal
SAMPLING PROCEDURES	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	C
	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	Corrected Prior Deficiencies	18	EVAL. CODE	O	O
OTHER REVIEW		19	EVAL. CODE		
		20			

SIGNATURE OF REVIEWER: Dr. F. Choudry

DATE: 05/06/04

FSIS FORM 9520-4 (9/96)

Designed on FormFlow Software

FOREIGN COUNTRY LABORATORY REVIEW *(Comment Sheet)*	REVIEW DATE	NAME OF FOREIGN LABORATORY
	04/06/04	Allied Laboratory Services Ltd.

FOREIGN GOV'T AGENCY	CITY & COUNTRY	ADDRESS OF LABORATORY
Private	Grimsby, Great Britain	The Technical Center , Wickham Road, Grimsby North East Lincolnshire

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL
Dr. F. Choudry & Dr. M. Chaudry	Alistair J. Booth BVMS, MSc. MRCVS, Veterinary Meat Hygiene Advisor

RESIDUE	ITEM NO.	COMMENTS
Salmonella spp.	07	Allied Laboratory Services Ltd is using ISO 6579 method for the detection of *Salmonella* which has been modified since May 2003, and it was not submitted to OIA, Washington, D.C for equivalence determination prior to use.

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Grampian Country Pork Parliament Street Norton, Malton, North Yorkshire	04/13/04	UK 2060	Great Britain
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. F. Choudry & Dr. M. Chaudry		X ON-SITE AUDIT ___ DOCUMENT AUDIT

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

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

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

60. Observation of the Establishment

Eetablishment # UK 2060 Dated 04/13/04 Slaughter/processing operation

48/51. Receptacles (plastic bins) used for storing edible products were not conspicuously and distinctively identified. A few of these receptacles were being used for discarded packaging materials in the processing, cut-up and boning rooms. Establishment officials took corrective action immediately.
9 CFR416.3(c) regulatory requirements were not adequately met.

51/55/56. The Meat Hygiene Service (MHS) inspectors were not palpating swine lungs and livers and were not incising and observing mandibuler lymph nodes properly. MHS officials took corrective actions immediately and provided written instructions to those inspectors.
CD 64/433/EEC Annex 1 Chapter VI.24.b & c requirements were not adequately met.

61. NAME OF AUDITOR
Dr. F. Choudry

62. AUDITOR SIGNATURE AND DATE

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
ABP Connect Corporation Road, King George Dock Hedon Road, HULL	04/05/04	UK2182	Great Britain
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. F. Choudry & Dr. M. Chaudry		X ON-SITE AUDIT ___ DOCUMENT AUDIT

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

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

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

60. Observation of the Establishment

Establishment: UK2182 Audit Date: 04/05/04 Cold Storage Facility

61. NAME OF AUDITOR

Dr. F. Choudry

62. AUDITOR SIGNATURE AND DATE

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defra
Department for Environment
Food and Rural Affairs

Our reference:
Your reference: EXM 1243 C

Sally White (001 202 690 4040)
Director
International Equivalence Staff
Office of International Affairs
USDA FSIS
1400 Independence Avenue
Washington, D.C. 20250

16 September 2004

Dear Sally

USDA FSIS AUDIT OF MEAT INSPECTION SYSTEM IN GREAT BRITAIN 31 MARCH - 16 APRIL 2004

Thank you for your letter of 13 July, which was received at this office on 29 July, enclosing the draft final report of the FSIS audit of our meat inspection system.

We have discussed the report with veterinary colleagues from the Food Standards Agency, who accompanied the FSIS auditors. In general terms, we have very few comments or objections regarding Dr Choudry's findings, but would like to draw your attention to the following observations in respect of the draft report:

Page 9 - Paragraph 6.2.4.

The Meat Hygiene Service term 'Principal Official Veterinary Surgeon' (POV) has been replaced by 'Regional Veterinary Adviser' (RVA)

Page 13 - Section 10 - Animal Disease Controls

The third paragraph of this section refers the continuation of hog cholera restrictions enforced by APHIS on the counties of Essex, Norfolk and Suffolk. These restrictions were lifted by APHIS for exports of swine and pigmeat from the UK to the US in March 2004.

Foreign Establishment Audit Checklist - UK/2060/EEC

Malton Bacon Factory has been re-named to Grampian Country Pork

Foreign Establishment Audit Checklist - UK/2182/EEC

Nippress Cold Storage Limited has been re-named to ABP Connect

Inadequate Post-Mortem Inspection

As you state in your letter, the inadequate post-mortem inspection at Grampian Country Pork was dealt with immediately and subsequent reports have not revealed any further problems.

***Salmonella* testing**

With regard to *Salmonella* testing, Allied Laboratories were instructed to discontinue their modified ISO Method 6579 immediately the problem came to our attention. Since then, the laboratory has continued to use the method specified in ISO 6579.

We have recently received a request from Allied to advise on procedures for updating the current method for *Salmonella* testing whilst continuing to comply with USDA requirements. Allied have notified us that they would like to adopt a new British Standard method, BS EN ISO 6579:2002. In accordance with your instructions, a copy of this method will be forwarded to FSIS through the European Commission for a determination of equivalence.

Separation of Fresh Meat and Cooked and Cured Products Operations at Grampian Country Pork

Following the audit visit, Grampian were informed that the current arrangements concerning lack of separation between the fresh meat side of the premises and the non-approved cooked and cured products operations are no longer regarded as acceptable by the USDA.

We requested detailed plans and a timetable from Grampian, indicating how they intend to address this problem and when they will commence initial corrective measures with a view to a later permanent resolution. The company response indicated that they will be introducing a plan to ensure the complete segregation of people, product, utensils and services of the current slaughterline and fresh meat areas from the processing and retail packing areas.

They intend to achieve this by the following means:

- Provision of a physically separate amenity area, locker rooms and canteen for USDA-approved areas only;
- Physical separation of production facilities;
- Personnel access to USDA-approved areas via sluice facilities only;
- Separate dispatch facility for USDA-approved area products;
- Separate utensil washing facility for USDA-approved area.

The intention is to create two entirely separate production facilities within the factory, one to comply with the specific requirements of the USDA and the other to comply with EU requirements with respect to processing and packing of retail products.

We are still awaiting the detailed plans for these proposals and will write to you again at the end of September, enclosing any copies of the plans we receive from Grampian together with an assessment of the proposal with a view to approval by FSIS.

Species Testing

As advised in my letter regarding the 2003 audit by FSIS, I can advise you that species testing has now commenced on a six monthly basis, with a sample of the American rib product intended for export to the United States being submitted to a United Kingdom Accreditation Service (UKAS) Laboratory. Tests for material of porcine, bovine, ovine and poultry origin will be carried out on the sample.

Thank you for the opportunity to comment on the draft report and I look forward to receiving a copy of the final report in due course. If you have any outstanding concerns, I should be grateful if you would contact me.

Finally, on a personal note, congratulations on your wedding and my very best wishes for your future happiness.

Kind regards.

Yours sincerely

NIGEL GIBBENS
Head, International Animal Health Division

cc: Steve Knight, US Embassy, London (by fax: 020 7894 0031)
James Hughes (e-mail: James.Hughes@fco.gov.uk)