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

JUL 5 2002

Dr. Tony Zohrab
Director, Animal Products
MAF Regulatory Authority
Ministry of Agriculture and Forestry
ASB Bank House, 101-103 the Terrace
Post Office Box 2526
Wellington, New Zealand

Dear Dr. Zohrab:

The Food Safety and Inspection Service (FSIS) conducted a special on-site audit of New Zealand's inspection system for ratites from September 6-8, 2001. Enclosed is a copy of the final audit report. Your comments have been included as Attachment G.

FSIS appreciates the actions taken by New Zealand to address and correct the deficiencies noted in the draft final audit report as outlined in your May 9 comments. In addition, we look forward to working with New Zealand on the equivalence issues highlighted in the audit report and mentioned in your letter.

If you have any questions about this audit or need additional information, please contact me at 202-720-3781. My fax number is 202-690-4040, and my e-mail address is sally.stratmoen@fsis.usda.gov.

Sincerely,

Sally Stratmoen

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

Enclosure

cc:
Jason Frost, Technical Coordinator, Embassy of New Zealand
David Young, Minister Counselor, US Embassy, Wellington
Ross Kreamer, FAS Area Officer
Linda Swacina, Acting Associate Administrator, FSIS
John Prucha, ADA, OPPDE
Karen Stuck, Chief, IES, IPS, OPPDE
Sally Stratmoen, Chief, ES, IPS, FSIS
Donald Smart, TSC, FSIS
Gary Stefan, ES, IPS, OPPDE
Amy Winton, State Department
Maritza Colon-Pullano, SAIFS, OPPDE
Country File (New Zealand – FY 2001 Special Audit-Ratites)

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United States Department of Agriculture
Food Safety And Inspection Service
Technical Service Center
Suite 300, Landmark Center
1299 Farnam Street
Omaha, NE 68102

SPECIAL AUDIT REPORT FOR NEW ZEALAND

September 6 through September 8, 2001

INTRODUCTION

Background

This report reflects information that was obtained during an audit of New Zealand's inspection system for ratites from September 6 through September 8, 2001. Only one establishment certified to export ratite meat to the United States was audited for an equivalence evaluation under the United States Department of Agriculture (USDA), Food Safety and Inspection Service's (FSIS) the mandatory poultry inspection regulations as described in Code of federal regulations, Title 9, Chapter III and Parts 381.6 and 381.7 effective April 26, 2001

This is the first FSIS audit of a ratite (poultry) inspection system in New Zealand. The last audit of the New Zealand meat (bovine and ovine) inspection system was conducted in March 2001, when nine establishments were audited.

During calendar year 2001 (January to September-2001) New Zealand exported 415, 530, 822 pounds of fresh beef and beef products, beef edible organs, veal, mutton and lamb products to the U.S. Port-of-entry rejections were 1, 058, 581 pounds (.2547%) for processing defects, miscellaneous defects, contamination, pathological defects, and transportation damage and missing shipping marks.

PROTOCOL

This on-site audit was conducted in two parts. One part involved visits with New Zealand's national meat inspection officials to discuss oversight programs and practices, including enforcement and compliance activities regarding ratite products. The second entailed an audit of the establishment on-site.

New Zealand'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 generic *E. coli* testing program; and (5) enforcement controls, including the testing program for *Salmonella* species.

During the on-site establishment visit, 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 lacking in the establishment audited (Est. 117). Details of audit findings and observations, including compliance with HACCP programs, SSOPs, and testing programs for *Salmonella* and generic *E. coli* are discussed later in this report.

Entrance Meeting

On September 6, 2001, an entrance meeting was held at Ministry of Agriculture and Forestry (MAF) of New Zealand at Wellington, and was attended by Mr. Glen Neal, Lindsay Nicholls, Carolyn Andrews, MAF Food Assurance Authority (FAA); Dr. Geoff Allen, Director Compliance and Investigation Group, MAF-FAA; Ms. Judy Barker, Program Manager; MAF-FAA; Dr. Suresh Singh, International Audit Staff Officer and Dr. Ghias Mughal, Chief, International Review Staff of the Food Safety and Inspection Service (FSIS) of the United States Department of Agriculture (USDA). Topics of discussion included the following:

1. Welcome by MAF-FAA and a presentation of the structure of the New Zealand Meat Inspection Program.

2. Ratite National Microbiological Database of New Zealand (NZ).

3. Previous audit issues and Washington correspondence.

Headquarters Audit

There had been no changes in the organizational structure or upper levels of inspection staffing since the last U.S. audit of the New Zealand inspection system.

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

No records review was conducted at the headquarters. The records review at the establishment (117) focused primarily on food safety hazards and was conducted at the establishment and included the following:

- Internal review reports and compliance check/list
- A compliance visit to the establishment that was certified to export to the U. S.
- Training records for inspectors
- Records such as generic labels, and animal raising claims.

- New laws and implementation documents such as regulations, notices, directives and guidelines.
- 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 and veterinary coverage.
- Export product inspection and control including export certificates.
- Enforcement records including examples of criminal prosecution, consumer complaints, recalls, seizure and 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 of the examination of these documents.

Government Oversight

All inspection veterinarians and inspectors in establishments certified by New Zealand as eligible to export meat products to the United States were full-time, MAF Verification Agency and Asure NZ employees, receiving no remuneration from either industry or establishment. Asure inspectors are occasionally contracted out to the establishment to perform quality assurance functions. This use of Asure employees by establishments continues to be an equivalence issue. There are three independent agencies: MAF Food Assurance Authority (MAFFAA); MAF Verification Agency (MAFVA) and Asure New Zealand (ANZ) within the Agriculture and Forestry Ministry. Most of the field veterinary inspection officials are employed by MAFVA; most of the central government officials are employed by MAFFAA; and inspectors in the establishments are employed by Asure NZ. All three agencies work under guidelines of a Memorandum of Understanding.

Establishment Audit

Only one establishment was certified to export meat from ratites to the United States at the time this audit was conducted. Only one establishment (ME-117) was visited for an on-site audit. In this establishment, both New Zealand inspection system controls and establishment system controls were in place to prevent, detect and control contamination and adulteration of products except as noted below.

Laboratory Audits

No laboratory audits were conducted.

Establishment Operations by Establishment Number

Ratite (Ostrich) slaughter, cutting, and boning were being conducted in Establishment ME-117 when it was visited for this audit.

But on a routine basis, the establishment's operations were:

Slaughtering, cutting and boning of ratites on Tuesday and Wednesday.
Slaughtering, cutting and boning of equine on Friday and Monday.
Slaughtering of bovine-custom kill on Thursday.

SANITATION CONTROLS

Based on the on-site audit of the establishment, New Zealand's inspection system had controls in place for water potability, hand washing facilities, sanitizers, pest control program, temperature control, lighting, and ventilation. Basic establishment facilities, condition of facilities and equipment, product protection and handling and establishment sanitation programs were acceptable, except as noted below.

- Facilities and equipment were not maintained properly: there were several places where the floor, a wall and a door were broken and in need of repair.

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.

Cross-Contamination

- Fecal contamination was observed on one ostrich carcass. It was railed out immediately and MAF Verification Veterinary officials took corrective actions.

- Potential contamination was observed at the skinning operation from armpits of workers because all workers wore sleeveless shirts.

Humane Slaughter

- A stunning device was not working properly.

Maintenance

- A wall in a carcass cooler was in need of repair. Establishment officials agreed to repair and modify the facilities and agreed on time schedule with MAF Verification and Compliance authorities.

Personnel Hygiene and Practices

- Establishment employees were wearing sleeveless shirts that provided potential problems for contamination of product in summer months.

ANIMAL DISEASE CONTROLS

New Zealand's inspection system had controls in place to ensure adequate animal identification, ante-mortem and post-mortem inspection procedures and dispositions, condemned and restricted product control, and procedures for sanitary handling of returned and rework product.

There were reported to have been no outbreaks of animal diseases with public-health significance since the previous U.S. audit.

RESIDUE CONTROLS

New Zealand's National Residue Testing Plan for 2001, which included ratites, was being followed, and was on schedule.

The New Zealand inspection system had adequate controls in place to ensure compliance with sampling and reporting procedures and storage and use of chemicals. The Animal Products Act of 1999 reforms the New Zealand law that regulates the production and processing of animal materials and products to manage associated risks including drug and chemical residues.

SLAUGHTER/PROCESSING CONTROLS

The New Zealand inspection system had controls in place to ensure adequate humane handling and slaughter, packaging materials, label approvals, inspector monitoring, and processing (boning and cutting) equipment and records except for the deficiency noted on the FSIS Form 9520-2 (Attachment F) which was many feathers on carcasses.

HACCP Implementation

All establishments approved to export meat 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 and met FSIS requirements. The data collection instrument used accompanies this report (Attachment B).

Testing for Generic *E. coli*

New Zealand was testing for generic *E. coli* in ratites, and basic requirements were met except following:

- Testing frequency was based on National Microbiological Database with at least five carcasses per week at three sites regardless of production volume.

- The predominant class of animals slaughtered in the establishment was sampled.

ENFORCEMENT CONTROLS

Inspection System Controls

The New Zealand inspection system controls [ante-and post-mortem inspection procedures and dispositions, control of restricted product and inspection samples, control and disposition of dead, dying, diseased or disabled animals, boneless meat re-inspection, 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 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 counties 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.

In Establishment 117, horse slaughter and cutting activities are done on Mondays and Fridays, however, the auditor requested that GON to seek policy requirements from Washington.

Testing for *Salmonella* Species

New Zealand has not adopted any testing procedures and has not set any performance standard for *Salmonella* on ratite carcasses at the time of this audit.

Species Verification Testing

At the time of this audit, New Zealand was not exempt from the species verification-testing requirements. The auditor verified that species verification testing was being conducted in accordance with FSIS requirements.

Monthly Reviews

The National Compliance and Investigation Group, equivalent to our Domestic Review, was performing the in-depth reviews and audits. National and Regional Assessors report to the Director, Compliance and Investigation of MAFFAA. Team Leaders of MAF-VA conduct the monthly review based on the risk performance program called Performance Based Verification (PBV). Most of the team leaders of MAFVA are veterinarians with at least 5-15 years of experience. The establishment was not being reviewed routinely on a monthly basis because of its PBV performance.

The internal review program was not applied equally to both export and non-export establishments. Internal review visits were not announced in advance, and were conducted, at times by Team Leaders and at other times by Compliance Group Reviewers. The records of audited establishments were kept in the inspection offices of the individual establishments, and copies were also kept in the central MAF offices in Wellington, and were routinely maintained on file for a minimum of three years.

In the event that an establishment is found, during one of these internal reviews, to be out of compliance with U.S. requirements, and is delisted for U.S. export, before it may again qualify for eligibility to be reinstated, the Compliance Group is empowered to conduct an in-depth review, and the results are reported to MAFFA for evaluation; they formulate a plan for corrective actions and preventive measures.

Enforcement Activities

Enforcement activities are enabled through a Memorandum of Understanding between all government agencies involved with all aspects of the meat production and distribution system. MAF-Food Assurance Authority has the sole power to initiate all enforcement actions.

Exit Meeting

No exit meeting was conducted.

CONCLUSION

The inspection system of New Zealand 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. One ratite establishment was audited and was

evaluated as acceptable / re-review. The deficiencies encountered during the on-site establishment audit were adequately addressed to the auditor's satisfaction.

Dr. Suresh P. Singh (signed) Dr. Suresh P. Singh
International Audit Staff Officer

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 – *not applicable*
E. Laboratory Audit Form – *not applicable*
F. Individual Foreign Establishment Audit Form
G. Written Foreign Country's Response to the Draft Final Audit Report

Attachment A

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. Fre-quency addressed	6. Respons-ible indiv. Identified	7. Docu-mentation done daily	8. Dated and signed
ME117	√	√	√	√	√	√	√	√

Attachment B

Data Collection Instrument for HACCP Programs

Each of the establishment 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 had conducted a hazard analysis.
3. The analysis includes food safety hazards likely to occur.
4. The analysis includes the intended use of or the consumers of the finished product(s).
5. 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.
6. All hazards identified in the analysis are included in the HACCP plan; the plan lists a CCP for each food safety hazard identified.
7. The HACCP plan specifies critical limits, monitoring procedures, and the monitoring frequency performed for each CCP.
8. The plan describes corrective actions taken when a critical limit is exceeded.
9. The HACCP plan was validated using multiple monitoring results.
10. 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.
11. The HACCP plan's record-keeping system documents the monitoring of CCPs and/or includes records with actual values and observations.
12. The HACCP plan is dated and signed by a responsible establishment official.

The results of these evaluations were as follows:

Est. #	1. Flow diagram	2. Hazard analysis conducted	3. All hazards identified	4. Use & users included	5. Plan for each hazard	6. CCPs for all hazards	7. Monitoring is specified	8. Corr. actions are described	9. Plan validated	10.Adequate verific. Procedures	11.Adequate documentation	12. Dated and signed
ME117	√	√	√	√	√	√	√	√	√	√	√	√

Attachment C

Data Collection Instrument for Generic *E. coli* Testing

Each establishment 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 equivalent carcass site and collection methodology (Swab) is 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 .
9. The results of the tests are not being recorded on a process control chart but on a table form 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. Predomin. 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
117	√	√	√	√	√	√	√	√	√	√

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

FOREIGN PLANT REVIEW FORM

REVIEW DATE	ESTABLISHMENT NO. AND NAME	CITY
09-07-2001	ME-117, Clover Export Limited	Gore
		COUNTRY: New Zealand

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL	EVALUATION
Dr. S.P. Singh	Mr. Lindsey Nicholls	☐ Acceptable ☒ Acceptable/ Re-review ☐ 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 A
Water potability records	01 A	Product handling and storage	30 A	Laboratory confirmation	57 A
Chlorination procedures	02 A	Product reconditioning	31 A	Label approvals	58 O
Back siphonage prevention	03 A	Product transportation	32 A	Special label claims	59 O
Hand washing facilities	04 A	**(d) ESTABLISHMENT SANITATION PROGRAM**		Inspector monitoring	60 A
Sanitizers	05 A	Effective maintenance program	33 M	Processing schedules	61 O
Establishments separation	06 A	Preoperational sanitation	34 A	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 A	Container closure exam	66 O
Lighting	11 A	Antemortem inspec. procedures	38 A	Interim container handling	67 O
Operations work space	12 A	Antemortem dispositions	39 A	Post-processing handling	68 O
Inspector work space	13 A	Humane Slaughter	40 M	Incubation procedures	69 O
Ventilation	14 A	Postmortem inspec. procedures	41 A	Process. defect actions -- plant	70 O
Facilities approval	15 A	Postmortem dispositions	42 A	Processing control -- inspection	71 O
Equipment approval	16 A	Condemned product control	43 A	**5. COMPLIANCE/ECON. FRAUD CONTROL**	
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control	44 A	Export product identification	72 N
Over-product ceilings	17 A	Returned and rework product	45 A	Inspector verification	73 A
Over-product equipment	18 A	**3. RESIDUE CONTROL**		Export certificates	74 N
Product contact equipment	19 A	Residue program compliance	46 A	Single standard	75 A
Other product areas *(inside)*	20 M	Sampling procedures	47 A	Inspection supervision	76 A
Dry storage areas	21 A	Residue reporting procedures	48 A	Control of security items	77 A
Antemortem facilities	22 A	Approval of chemicals, etc.	49 A	Shipment security	78 A
Welfare facilities	23 A	Storage and use of chemicals	50 A	Species verification	79 A
Outside premises	24 A	**4. PROCESSED PRODUCT CONTROL**		"Equal to" status	80 A
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim	51 A	Imports	81 A
Personal dress and habits	25 A	Boneless meat reinspection	52 A		
Personal hygiene practices	26 A	Ingredients identification	53 O		
Sanitary dressing procedures	27 M	Control of restricted ingredients	54 O		

FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE	ESTABLISHMENT NO. AND NAME	CITY / COUNTRY
	09-07-2001	ME-117, Clover Export Limited	Gore / New Zealand

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL	EVALUATION
Dr. S.P. Singh	Mr. Lindsey Nicholls	☐ Acceptable ☒ Acceptable/ Re-review ☐ Unacceptable

COMMENTS:

20M - An inside wall in a carcass cooler was cracked and in need of repair.

27M - Many feathers were left on carcasses.

33M - The maintenance program was not adequate to prevent and correct defects such as cracked floors and walls in a timely manner.

40M - Stunning was not done properly, no indicator for completeness of stunning.

Attachment G

Ministry of Agriculture and Forestry, New Zealand
Te Manatu Ahuwhenua, Ngaherehere, Aotearoa

Ref: M-USA000

9 May2002

Sally Stratmoen
Chief, Equivalence Section
International Policy Staff
Office of Policy, Program Development and Evaluation
1400 Independence Avenue SW
Washington DC, 20250
UNITED STATES OF AMERICA

Dear Sally

DRAFT FINAL AUDIT REPORT - SEPTEMBER 6 - 8, 2001

Thank you for the opportunity to comment on the FSIS Draft Final Audit Report for the ratite inspection visit 6 -8 September 2001.

You ask about the New Zealand response to a letter sent to us on 18 October 2001. It would appear that the original letter was lost somewhere between New Zealand and your office. You should have received a resend of that letter now via our Embassy in Washington. If this is not the case please advise Jason Frost at the New Zealand Embassy, and we shall try again.

We understand that the reference to "marginally acceptable" in your covering letter equates to the "acceptable/re-review" outcome in the summary of the report. It should be noted that there was no exit meeting held thereby providing no opportunity to give clarifications to the reviewer. Therefore, New Zealand is providing specific comment to a number of points in the report in order to assist with the accuracy, and hence value of the Final Report.

The report noted that the establishment visited currently slaughters bovines, equines, and ratites (ostrich) at separate times, and notes that New Zealand will need to enter into discussions with Washington on this matter. New Zealand wishes to advise that separate representations will be made to Washington in this regard.

Since the receipt of this report, another on site review of the premises visited was conducted on 9 April 2002. The deficiencies noted in this report have been adequately addressed.

Appended as Annex I is the New Zealand response to the points raised by the Draft Final Report.

Yours sincerely

pp

Dr Tony Zohrab
Director (Animal Products)
MAF Food Assurance Authority

Annex I

New Zealand Response to the Draft Final Audit Report - 6-8 September 2001

Entrance Meeting

2. Ratite National Microbiological Database (NMD) of New Zealand (NZ)

At the time of the inspection New Zealand officials were in the process of developing this programme in association with representatives of the ratite industry. Work had been undertaken to determine the most appropriate carcass sampling sites. The establishment visited was carrying out microbiological sampling from those sites at the time of the visit, but these were not in accordance with a fully operational NMD. (Refer to later comments in this document).

Headquarters Audit

The third bullet on page 3 refers to generic *E. coli* and *Salmonella* testing which were not in place at the time, although a premises-based programme was in place at the time. (Refer to later comments in this document).

Government Oversight

Please note that the reference to "Commerce" on line 7 is incorrect. MAF Food Assurance Authority and MAF Verification Agency are both part of the Ministry of Agriculture and Forestry. Asure New Zealand is a State -Owned Enterprise (SOE) and is accountable to MAF Food for the performance of ante-mortem and post-mortem inspection to MAF Food standards.

SANITATION CONTROLS

Facilities and equipment, which had not been properly maintained at the time of the visit, were scheduled for attention and were corrected in a timely and appropriate fashion. This was demonstrated during the current FSIS inspection visit to New Zealand (3 April - 2 May 2002).

Cross-Contamination

New Zealand interprets the comment with regard to faecal contamination as noting positive corrective action.

The potential contamination from worker armpits was addressed following the FSIS inspection.

Humane Slaughter

New Zealand places high priority on stunning being performed in an humane manner, therefore, MAF Food is extremely disappointed to find that stunning was unacceptable to the reviewer during his inspection. The humane slaughter approval issued by MAF Food for the

establishment explicitly requires stunning to cease immediately if it cannot be performed humanely. Immediate action was taken to address the defective device.

Maintenance

Maintenance was scheduled and completed within agreed time frames.

Personnel Hygiene and Practices

The establishment to ensure that there were no continuing potential contamination problems addressed the matter of sleeveless shirts.

SLAUGHTER/PROCESSING CONTROLS

The dressing deficiency noted, "many feathers on carcasses", was addressed by the establishment immediately.

HACCP Implementation

At the time of the FSIS inspection the HACCP plan was in the process of being assessed by a MAF Verification Agency HACCP Co-ordinator as part of the recognition of validity process required by MAF Food for US-certified establishments.

Testing for Generic *E. coli*

While the establishment was performing microbiological sampling of carcasses using MAF Food agreed sampling sites there was no formal National Microbiological Database (NMD) in place, and hence formal carcass sampling numbers had not been established. An NMD has only recently been agreed between the ratite industry and MAF Food and is now being implemented. This puts many of the points identified in *Attachment C* of this report, in to place under an official programme.

The results obtained during the first year this NMD programme is in place will serve as a baseline study. New Zealand is prepared to share this information with FSIS to assist in the determination of appropriate performance criteria for ratite slaughter and dressing.

ENFORCEMENT CONTROLS

Inspection System Controls

As indicated in the covering letter, New Zealand will undertake separate discussions with FSIS with regard to the fact that this establishment is currently slaughtering and dressing equines.

Testing for *Salmonella* Species

New Zealand is currently implementing testing for *Salmonella* species as part of the ratite NMD programme.