



United States  
Department of  
Agriculture

Food Safety  
and Inspection  
Service

Washington, D.C.  
20250

MAR 19 2004

Dr. Peter W. de Leeuw  
Chief Veterinary Officer  
Ministry of Agriculture, Nature and Food Quality  
Room 425  
Post Office Box 20401  
2500 EK the Hague  
The Netherlands

Dear Dr. de Leeuw:

The Food Safety and Inspection Service (FSIS) conducted an on-site audit of The Netherlands' meat inspection system August 27 through September 11, 2003. Enclosed is a copy of FSIS' final audit report, which includes your January 12, 2004, comments to the draft final report of the same audit. Thank you for your comments and we have made appropriate changes to the final audit report regarding the protocol used for sampling pork carcasses for *Salmonella* testing.

If you have any questions concerning the FSIS audit or the final audit report, please contact me at telephone number 202-720-3781, facsimile number 202-690-4040, or at email address [sally.stratmoen@fsis.usda.gov](mailto:sally.stratmoen@fsis.usda.gov).

Sincerely,

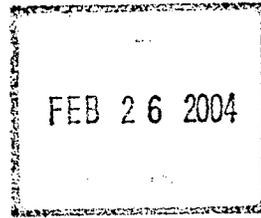
Sally Stratmoen, Director  
International Equivalence Staff  
Office of International Affairs

Enclosure

cc:

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Country File (FY 2003 Audit)

**FINAL**



FINAL REPORT OF AN AUDIT CARRIED OUT IN THE  
NETHERLANDS COVERING THE NETHERLANDS' MEAT  
INSPECTION SYSTEM

August 27, 2003 through September 11, 2003

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. [National Inspection Service for Livestock and Meat or Rijksdienst voor de keuring van Vee en Vless (RVV)]
<i>E. coli</i>	<i>Escherichia coli</i>
EU/US VEA	European Union/United States Veterinary Equivalence Agreement
FSIS	Food Safety and Inspection Service
NOID	Notice of Intent to Delist
PR/HACCP	Pathogen Reduction/Hazard Analysis and Critical Control Point Systems
RVV	Rijksdienst voor de keuring van Vee en Vless or National Inspection Service for Livestock and Meat
<i>Salmonella</i>	<i>Salmonella</i> species
SSOP	Sanitation Standard Operating Procedures
USDA	United States Department of Agriculture
VWA	Voedsel en Waren Autoriteit or The Food and Non-Food Authority

## 1. INTRODUCTION

The United States Department of Agriculture, Food Safety and Inspection Service audit took place in the Netherlands from August 27 through September 11, 2003.

An opening meeting was held on August 27 in The Hague with the Central Competent Authority (CCA), which is the National Inspection Service for Livestock and Meat or RVV. At this meeting, the audit team confirmed the objective and scope of the audit, the audit team's itinerary, and requested additional information needed to conduct the audit of the Netherlands' meat inspection system. The Netherlands is also eligible to export egg products to the United States, but has not done so in several years and the CCA indicated that there are no current plans to begin exporting egg products to the United States. Thus, this audit focused only on The Netherlands' meat inspection system.

The audit team was accompanied during the entire audit by representatives from the RVV. The FSIS audit team consisted of a senior equivalence officer of the Office of International Affairs, a senior microbiologist of the Office of Public Health and Science, and two international auditors/veterinarians of the Office of Program Evaluation, Enforcement and Review.

## 2. OBJECTIVE OF THE AUDIT

This audit was an enforcement audit to determine whether The Netherlands would retain eligibility to continue exporting meat to the United States. The objective of the audit was to conduct an in-depth evaluation of the performance of the CCA with respect to controls over the production and exporting of meat products to the United States.

In pursuit of the objective, the following sites were visited: the headquarters of the CCA, two regional inspection offices, three district offices, nine swine slaughter and/or processing establishments and four cold storage facilities, and three laboratories performing microbiology and/or residue analytical testing on U.S.-destined product.

Competent Authority Visits			Comments
Competent Authority	Central	1	RVV Headquarters
	Regional	2	North Region and East Region
	District	3	Almelo, Doetinchem, and Wijchen Districts
Laboratories		3	
Meat Slaughter Establishments		4	
Meat Processing Establishments		5	
Cold Storage Facilities		4	

### 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, regional, district, and local (establishment) offices. The third part involved on-site reviews of 13 meat establishments: four slaughter establishments, five processing establishments including two canning facilities and four cold storage facilities. Of the 13 establishments, 11 were certified to export meat to the United States and two were non-certified establishments. The CCA requested FSIS to review the two non-certified establishments. The fourth part involved reviews of three government and/or private laboratories conducting microbiology and/or residue analyses on samples of meat products destined for the United States.

Program effectiveness determinations of The Netherlands inspection system focused on five areas of risk: (1) sanitation controls, including the implementation and operation of SSOP, (2) animal disease controls, (3) slaughter/processing controls, including the implementation and operation of HACCP programs and a sampling/testing program for *Enterobacteriaceae*, (4) residue controls, and (5) enforcement controls, including sampling/testing programs for *Salmonella* and species verification testing. The Netherlands inspection system was assessed by evaluating these five risk areas.

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

At the opening meeting, the audit team explained that The Netherlands' meat inspection system would be audited in accordance with three areas of focus. First, under provisions of the EU/US VEA, the FSIS audit team 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. Only these three directives have been declared equivalent by FSIS under the EU/US VEA.

Second, in areas not covered by these directives, the audit team would audit against FSIS inspection 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, and testing for the presence of *Salmonella*.

Third, the audit team would audit against the equivalence judgements determined by FSIS for The Netherlands under provisions of the *Agreement on the Application of Sanitary and Phytosanitary Measures* (SPS Agreement). Accordingly, FSIS has made an equivalence determination regarding the sampling and testing for the presence of *Enterobacteriaceae* in lieu of generic *E.coli*, and ISO Method 6579 in lieu of the FSIS laboratory testing method for the detection of *Salmonella*.

During the opening meeting, FSIS was advised that one establishment was delisted by RVV immediately before this audit.

#### 4. LEGAL BASIS FOR THE AUDIT

The audit was conducted under the specific provisions of U.S. 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:  
[www.fsis.usda.gov/OPPDE/FAR/index.htm](http://www.fsis.usda.gov/OPPDE/FAR/index.htm)

In the audit of June 2002, the following findings were observed:

- Inadequate SSOP and HACCP implementation.
- Monthly supervisory reviews not being conducted required.
- Problems with sanitary operations at establishments including grounds and pest control.
- Inadequate daily inspection.
- Inadequate enforcement by CCA in establishments.
- Insufficient training of inspectors.
- Of 12 establishments reviewed, three were delisted and five received a NOID.

In the audit of February 2003, improvements were noted. The following findings were observed:

- Continuing problems with SSOP and HACCP implementation.
- Incomplete monthly supervisory reviews.
- Non-FSIS approved *Salmonella* testing method (VIDAS).
- Inadequate laboratory quality control procedures (residue laboratory).
- Inadequate enforcement by CCA in establishments.
- Of 10 establishments reviewed, one received a NOID.

## 6. MAIN FINDINGS

### 6.1 Legislation

The audit team was informed that the relevant EC Directives, determined equivalent under the EU/US VEA, had been transposed into Dutch legislation and are being applied in all certified establishments, as appropriate.

### 6.2 Government Oversight

FSIS regulations require that a foreign country's meat inspection system be organized and administered by the national government. More specifically, there must be sufficient organizational structure and staffing to ensure uniform enforcement of the requisite laws and regulations in all establishments certified to produce or store product for export to the United States. Second, the CCA must have ultimate control and supervision over the official activities of all employees and licensees. Third, the CCA must ensure the assignment of competent, qualified inspectors. Fourth, the CCA must have the authority and responsibility to enforce the laws and regulations governing meat inspection. Finally, the CCA must have adequate administrative and technical support to operate its inspection program.

#### 6.2.1 CCA Control Systems

The RVV has the responsibility for carrying out The Netherlands' meat inspection program including oversight and enforcement of the FSIS regulatory requirements in establishments certified to export to the United States. The RVV is an agency within the Ministry of Agriculture, Nature Management and Fisheries and has a staff of approximately 1,600 personnel to carry out its meat inspection activities. All RVV inspection personnel assigned to establishments certified to export meat to the United States are government employees receiving no remunerations from either industry groups or establishment personnel.

RVV regulatory oversight of its meat inspection system consists of four levels: central, regional, district, and team. RVV provides direct oversight of five regional offices, which provide oversight of 16 district offices. The district offices manage 47 teams with each team being supervised by a Team Leader and having responsibility of two or more establishments. The Team Leader supervises two or more veterinarians-in-charge, other full time RVV veterinarians, part-time private practitioners (veterinarians), full-time RVV meat inspectors, and part-time assistant meat inspectors. Due to the closing of some meat and poultry establishments, the RVV was currently not using the services of their part-time employees.

With regard to the 11 establishments currently certified to export to the United States, government oversight is being managed by two regions (Kring Nord and Kring Oost), four districts (Almeo, Apeldoorn, Doetinchem, and Wijchen) and eight teams. In addition, the CCA has a delegated person with the responsibility to ensure certified establishments are meeting FSIS inspection requirements.

#### 6.2.2 Ultimate Control and Supervision

The RVV has the legal authority to enforce the meat inspection activities of The Netherlands. Through its linear government oversight, i.e., headquarters to regions to districts to team

leaders, adequate supervision is provided to ensure compliance with the FSIS inspection requirements.

The veterinarian-in-charge assigned to certified establishments has the authority to cease the establishment's production operations any time the wholesomeness and safety of the product are jeopardized. He/She reports directly to the Team Leader and consults all decisions regarding enforcement activities. The decision as to whether a certified establishment is failing to meet FSIS inspection requirements and the recommendation that it should be delisted is a combined effort of the applicable regional supervisor and headquarter' officials.

The Team Leaders have direct supervision over all inspection personnel assigned to establishments. For the 11 certified establishments and two non-certified establishments, RVV has placed a sufficient number of official inspection personnel to adequately carry out the FSIS inspection requirements.

#### 6.2.3 Assignment of Competent, Qualified Inspectors

All official veterinarians and meat inspectors employed by the Netherlands' meat inspection program possess the required educational degree necessary to meet minimum qualifications. These inspection personnel undergo introductory training as well as participate in on-the-job training under the supervision of experience veterinarians. Continual training is provided for all inspection personnel as needed. The regional offices maintain individual training records of inspection personnel. Training can be assigned by the regional office or RVV headquarters.

In the fall of 2002, several inspection personnel assigned to certified establishment received PR/HACCP training from a private contractor. RVV has scheduled additional PR/HACCP training later this year for the remaining inspection personnel assigned to certified establishments. Interviews by the FSIS audit team with various levels of inspection personnel demonstrated the need of RVV to continue with its training programs relevant to FSIS inspection requirements including PR/HACCP.

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

Veterinary officers and meat inspectors are authorized to enforce U.S. import requirements and EU legislation including animal health and welfare, control of animal disease, veterinary medicines, and the production of safe foods of animal origin. Through the legal process in the courts, RVV, with the assistance of The Netherlands' enforcement agency (AID), has the authority to prosecute meat establishments and withdraw official inspection.

#### 6.2.5 Adequate Administrative and Technical Support

During this audit, the FSIS audit team determined that the CCA has administrative and technical support to operate The Netherlands' meat inspection system and has the resources and the capability to support a third party audit.

### 6.3 Headquarters Audit

The FSIS audit team discussed with the RVV officials in headquarters, regions, and districts the following areas relative to The Netherlands' meat inspection system:

- Internal audit reports.
- Supervisory visits to establishments that were certified to export to the U.S.
- Training records for inspectors.
- Applicable laws and implementation documents such as regulations, notices, directives, and guidelines.
- Sampling and laboratory analyses for residues, *Enterobacteriaceae*, *Listeria monocytogenes*, *Salmonella*, and species verification testing.
- 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 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.

As the result of the discussions and records review, the following findings were noted:

- The laboratory testing method for the detection of *Salmonella*, i.e., ISO 6579, was modified to include screening by VIDAS SLM, which was not approved by FSIS. The RVV submitted the alternative method to FSIS for equivalence determination.
- Species verification testing of meat products exported to the United States did not include testing for the presence of beef. FSIS advised the RVV that they must immediately include beef as part of RVV's routine species verification testing program for meat products destined to the United States. The RVV agreed to implement immediately.
- FSIS received clarification regarding the type of ready-to-eat meat products being exported to the United States. Accordingly, since The Netherlands is currently exporting to the United States only ready-to-eat products that are commercially sterile (i.e., canned hams, canned luncheon meat, and canned cocktail sausages), *Listeria* testing is not required by FSIS for these types of ready-to-eat products.
- Due to the delistment by The Netherlands of establishment 64 immediately prior to this audit, FSIS advised the RVV that this establishment cannot be re-certified until FSIS: 1) has been notified in writing by the RVV of the actions taken to ensure the establishment meets FSIS inspection requirements, and 2) has the opportunity to verify that the corrective actions occurred.

#### 6.3.1 Audit of Regional, District, and Local Inspection Offices.

The FSIS audit team reviewed The Netherlands' meat inspection records and held interviews with the RVV inspection officials at the two regional and three district offices indicated below:

Kring Noord (Regional North)

Kring Oost (Regional East)  
District Office at Almelo  
District Office at Doetinchem  
District office at Wijchen

The purpose of the reviews was to examine the meat inspection records and determine the degree of government oversight and control provided by the regional and district offices relative to the establishments certified to export meat to the United States.

The audit team concluded that:

- Relevant regulations, notices, and other inspection documents and records were adequately disseminated from headquarters to both the regional and district offices. This was accomplished by hard copy and emails.
- RVV inspection personnel at these two levels of government oversight need to continue to strengthen its knowledge and application of FSIS inspection requirements.
- The regional offices demonstrated adequate administrative assistance to ensure that official inspection personnel were assigned to the certified establishments.

#### Local Inspection Sites (Establishments)

The FSIS audit team reviewed The Netherlands' 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 some of the team leaders, veterinarians-in-charge, and meat inspectors at the certified establishments.

The audit team concluded that:

- All relevant regulations, notices, and other inspection documents and records were adequately disseminated from headquarters to inspection personnel at the certified establishments (local inspection sites). This was accomplished by both hard copy and emails.
- Inspection personnel demonstrated adequate knowledge of inspection requirements relative to the production and export of meat products to the United States. However, the inspection personnel need to continue to strengthen their knowledge and application of FSIS inspection requirements.

## 7. ESTABLISHMENT AUDITS

The FSIS audit team visited a total of 13 establishments; four were slaughter establishments, five were processing establishments and four were cold storage facilities. Of the 13 establishments, 11 were certified to export to the United States and two were non-certified establishments. None of the certified establishments were delisted or received an NOID from the CCA.

Specific deficiencies are noted on the attached Foreign Establishment Audit Checklist (FSIS Form 5000-6).

## 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. In addition, the FSIS audit team

conducted an in-depth review of The Netherlands' microbiology sampling and laboratory testing program relative to meat exports to the United States.

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. For private laboratories, the audit team evaluated compliance with the criteria established for the use of private laboratories under the PR/HACCP requirements.

The following laboratories were reviewed:

- RIKILT is a government laboratory located in Wageningen. It conducts residue analyses.
- LRVV is a government laboratory located in Wageningen. It conducts microbiology analyses (*Salmonella*).
- CCL is a private laboratory located in Veghel. It conducts microbiology analyses (Species Verification).
- TNO is a private laboratory located in Zeist. It conducts microbiology analyses (*Enterobacteriaceae*).

The findings of the RIKILT laboratory will be discussed in Section 12 (Residue Controls).

The findings of the microbiology laboratories (LRVV, CCL, and TNO) will be discussed below and other designated sections of this report.

LRVV:

- This laboratory uses dried milk samples as its test matrix for proficiency testing instead of raw ground beef. In addition, this laboratory conducts proficiency testing of work groups and not individual analysts. Both issues are being reviewed by FSIS.
- For *Salmonella* testing, LRVV uses the ISO 6579 method modified to include screening by VIDAS SLM. The ISO 6570 had been previously approved by FSIS, but the modified method regarding VIDAS SLM screening had not. The RVV submitted the VIDAS SLM method to FSIS for equivalence determination.

## 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 reviews of establishments, The Netherlands' inspection system had controls in place for meeting the basic 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, The Netherlands inspection system has controls in place for water potability records, chlorination procedures, back-siphonage prevention, separation of operations, temperature control, workspace, 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 the 13 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 regarding SSOP requirements.

## 10. ANIMAL DISEASE CONTROLS

The second of the five risk areas that the FSIS auditor 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 audit team determined that The Netherlands 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.

## 11. SLAUGHTER/PROCESSING CONTROLS

The third of the five risk areas that the FSIS audit team 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, with the exception of cold storage facilities, 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 nine establishments (four establishments were cold storage facilities). All required establishments had adequately implemented the HACCP requirements.

### 11.3 Testing for Generic *E. coli*

The Netherlands is using an *Enterobacteriaceae* laboratory testing program that has been determined to be equivalent to the FSIS regulatory requirements for generic *E. coli* testing.

Four of the 13 establishments reviewed were required to meet the equivalent of the basic FSIS regulatory requirements for generic *E. coli* testing. These four establishments were evaluated according to the criteria employed in the U.S. domestic inspection program and the alternative procedures submitted by the CCA and determined equivalent by FSIS.

The alternative equivalent sanitary measures involve using *Enterobacteriaceae* instead of generic *E. coli* as an indicator organism, sampling based on a testing frequency of 10 tests per week rather than based on production, sampling swine from the flank, brisket, rump, and back rather than the ham, belly, and jowl, and using the cork-borer method of sample collection rather than the sponge or excision method.

Equivalent generic *E. coli* testing (i.e., *Enterobacteriaceae*) was properly conducted in the four slaughter establishments.

### 11.4 Testing for *Listeria monocytogenes*.

Two of the 13 establishments were producing ready-to-eat products for export to the United States. These two certified establishments were canning facilities and were producing commercially sterile pork products (i.e., canned hams, canned luncheon meat, and canned cocktail sausages). *Listeria* testing is not required by FSIS for these types of ready-to-eat products.

### 11.5 EC Directive 64/433

In the applicable establishments, the provisions of EC Directive 64/433 were effectively implemented regarding slaughter/processing controls with the exception of the following deficiency:

- In all four slaughter establishments, the mesenteric lymph nodes were not being palpated by the inspector during post mortem inspection of swine viscera.

## 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 deficiencies were noted in the RIKILT laboratory. The Netherlands' National Residue Control Program for 2003 was being followed and was on schedule.

### 12.1 EC Directive 96/22

The provisions of EC Directive 96/22 were effectively implemented.

### 12.2 EC Directive 96/23

The provisions of EC Directive 96/22 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*.

### 13.1 Daily Inspection in Establishments

Inspection was being conducted daily in all establishments.

### 13.2 Testing for *Salmonella*

The Netherlands has adopted the FSIS requirements for testing for *Salmonella* with the exception of the following equivalent measures.

- The Netherlands uses a continuous, on-going sampling program to determine when to initiate additional *Salmonella* testing.
- The Netherlands uses the swab protocol for sampling. Samples are composited and the entire composite is analyzed.
- The government laboratory uses the ISO 6579 testing method for the detection of *Salmonella*.

Four of the 13 establishments were required to meet the basic FSIS regulatory requirements for *Salmonella* testing, and were evaluated according to the criteria employed in the U.S. domestic inspection program and the alternative sanitary measures determined equivalent by FSIS. The Netherlands' sampling and testing program for *Salmonella* met the FSIS requirements with the following exception:

- The government laboratory was using the VIDAS SLM screening method, which was not approved by FSIS. The RVV submitted the screening method to FSIS for an equivalence determination.

### 13.3 Species Verification

Two of the 13 establishments were required to conduct species verification testing of samples of meat products being exported to the United States. FSIS requires species verification to include the testing for the presence of both poultry and beef. In the two establishments, which were producing canned pork products for export to the United States, species verification testing was being conducted as required with the exception of the following:

- Species verification in both establishments did not include testing for the presence of beef. The RVV advised FSIS that in addition to poultry it would begin testing immediately for the presence of beef.

#### 13.4 Monthly Reviews

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

#### 13.5 Inspection System Controls

With the following exception, the CCA had controls in place for ante-mortem and post-mortem inspection procedures and dispositions; 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 the four slaughter establishments reviewed, the mesenteric lymph nodes were not being palpated by the inspector during post-mortem inspection of swine viscera. The RVV advised FSIS that the current edition of EC Directive 64/433 does not require mandatory palpation of the mesenteric lymph nodes, but will begin immediately to do so in slaughter establishments producing pork for export to the United States. The RVV indicated that it would submit the alternative method of not palpating the mesenteric lymph nodes of swine and supporting scientific documentation to FSIS for an equivalence determination.

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 September 11, 2003, in The Hague, with the CCA. At this meeting, the primary findings and conclusions from the audit were presented by the audit team.

The CCA understood and accepted the findings.

Mr. Steven McDermott  
Team Leader  
Office of International Affairs



15. ATTACHMENTS TO THE AUDIT REPORT

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

**FOREIGN COUNTRY LABORATORY REVIEW**

REVIEW DATE

Sept. 8, 2003

NAME OF FOREIGN LABORATORY

State Institute for Quality Control of Agricultural Products (RIKILT)

FOREIGN GOV'T AGENCY  
 Department of Wageningen University and Research Center (WUR)

CITY & COUNTRY  
 Wageningen, Netherlands

ADDRESS OF LABORATORY  
 Building No. 123 Bornsesteeg 45, Wageningen

NAME OF REVIEWER  
 Dr. M. Ghias Mughal

NAME OF FOREIGN OFFICIAL  
 Mr. A. Roos, Supervisor Quality Assurance

Residue Code/Name			100	111	300	400	500	600								
SAMPLING PROCEDURES	REVIEW ITEMS	ITEM #	EVALUATION CODE													
	Sample Handling	01	A	A	A	A	A	A								
	Sampling Frequency	02	A	A	A	A	A	A								
	Timely Analyses	03	A	A	A	A	A	A								
	Compositing Procedure	04	O	O	O	O	O	O								
	Interpret Comp Data	05	O	O	O	O	O	O								
Data Reporting	06	A	A	A	A	A	A									
ANALYTICAL PROCEDURES	Acceptable Method	07	A	A	A	A	A	A								
	Correct Tissue(s)	08	A	A	A	A	A	A								
	Equipment Operation	09	A	A	A	A	A	A								
	Instrument Printouts	10	A	A	A	A	A	A								
QUALITY ASSURANCE PROCEDURES	Minimum Detection Levels	11	A	A	A	A	A	A								
	Recovery Frequency	12	A	A	A	A	A	A								
	Percent Recovery	13	A	A	A	A	A	A								
	Check Sample Frequency	14	A	A	A	A	A	A								
	All analyst w/Check Samples	15	A	A	A	A	A	A								
	Corrective Actions	16	A	A	A	A	A	A								
International Check Samples	17	A	A	A	A	A	A									
REVIEW	Corrected Prior Deficiencies	18	O	O	O	O	O	O								
OTHER REVIEW		19														
		20														

SIGNATURE OF REVIEWER

*Dr. M. Ghias Mughal*

DATE

9/8/03

**FOREIGN COUNTRY LABORATORY REVIEW**

*(Comment Sheet)*

REVIEW DATE

Sept. 8, 2003

NAME OF FOREIGN LABORATORY

State Institute for Quality Control of Agricultural Products (RIKILT)

FOREIGN GOV'T AGENCY

Department of Wageningen University and Research Center (WUR)

CITY & COUNTRY

Wageningen, Netherlands

ADDRESS OF LABORATORY

Building No. 123 Bornsesteeg 45, Wageningen

NAME OF REVIEWER

Dr. M. Ghias Mughal

NAME OF FOREIGN OFFICIAL

Mr. A. Roos, Supervisor Quality Assurance

RESIDUE

ITEM NO.

COMMENTS

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

### FOREIGN COUNTRY LABORATORY REVIEW

REVIEW DATE  
 Sept. 8, 2003

NAME OF FOREIGN LABORATORY  
 Laboratory of the Inspection Service for Livestock and Meat (LRVV)

FOREIGN GOV'T AGENCY  
 National Inspection Service for Livestock and Meat

CITY & COUNTRY  
 Wageningen, Netherlands

ADDRESS OF LABORATORY  
 Postbus 144 6700 AC Wageningen

NAME OF REVIEWER  
 Dr. M. Ghias Mughal

NAME OF FOREIGN OFFICIAL  
 Mr. H.J. Keukens, Head of Laboratory for Livestock and Meat

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

SIGNATURE OF REVIEWER

*Dr. Ghias Mughal*

DATE

9/8/03

**FOREIGN COUNTRY LABORATORY REVIEW**

*(Comment Sheet)*

REVIEW DATE

Sept. 8, 2003

NAME OF FOREIGN LABORATORY

Laboratory of the Inspection Service for Livestock and Meat (LRVV)

FOREIGN GOV'T AGENCY

National Inspection Service for Livestock and Meat

CITY & COUNTRY

Wageningen, Netherlands

ADDRESS OF LABORATORY

Postbus 144 6700 AC Wageningen

NAME OF REVIEWER

Dr. M. Ghias Mughal

NAME OF FOREIGN OFFICIAL

Mr. H.J. Keukens, Head of Laboratory for Livestock and Meat

RESIDUE

ITEM NO.

COMMENTS

United States Department of Agriculture  
Food Safety and Inspection Service

## Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Dumeco Lichtenvoorde B.V. Lieveelde	2. AUDIT DATE 09/05/03	3. ESTABLISHMENT NO. 60	4. NAME OF COUNTRY Netherlands
	5. NAME OF AUDITOR(S) Dr.Faizur R. Choudry, DVM		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	O
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	X
24. Labeling - Net Weights		52. Humane Handling	
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	
<b>Part D - Sampling Generic E. coli Testing</b>		55. Post Mortem Inspection	X
27. Written Procedures		<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis		56. European Community Directives	X
29. Records		57. Monthly Review	
<b>Salmonella Performance Standards - Basic Requirements</b>		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

FSIS 5000-6 (04/04/2002)

60. Observation of the Establishment

Establishment #60      Date 09/05/03

55,56. The mesenteric lymph nodes were not palpated by the inspector during post mortem inspection of swine viscera. Council Directive 64/433 of June 26, 1964, Annex 1, Chapter VI 25(g) was not met.

51. Deficiencies regarding inadequate post mortem inspection procedures indicate insufficient government enforcement.

61. NAME OF AUDITOR  
Dr. Faizur R. Choudry, DVM

62. AUDITOR SIGNATURE AND DATE  
*Dr. Faizur R. Choudry* 09/05/03

United States Department of Agriculture  
Food Safety and Inspection Service

## Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION  Dumeco Scherpenzeel B. V. Scherpenzeel	2. AUDIT DATE 08/29/03	3. ESTABLISHMENT NO. 82	4. NAME OF COUNTRY Netherlands
5. NAME OF AUDITOR(S) Dr. Faizur R. Choudry, DVM			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	O
<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/Park 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		

FSIS 5000-6 (04/04/2002)

60. Observation of the Establishment

Establishment # 82

Dated 08/29/03

61. NAME OF AUDITOR  
Dr. Faizur R. Choudry, DVM

62. AUDITOR SIGNATURE AND DATE

*Dr. Faizur R. Choudry* 08/29/03

United States Department of Agriculture  
Food Safety and Inspection Service

## Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION  Zwanenberg Food Group B. V. Almelo	2. AUDIT DATE 09/01/03	3. ESTABLISHMENT NO. 129	4. NAME OF COUNTRY Netherlands
5. NAME OF AUDITOR(S)  Dr. Faizur R. Choudry, DVM		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	X
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	O
<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	X
24. Labeling - Net Weights		52. Humane Handling	O
25. General Labeling		53. Animal Identification	O
26. Fin. Prod. Standards/Boneless (Defects/AQL/Park 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

Establishment # 129      Dated 09/01/03

34. Species testing Did Not include testing for the presence of beef. *(Limited to the presence of poultry)*

51. RVV needs to strengthen its ability to enforce U.S. requirements.

61. NAME OF AUDITOR  
Dr. Faizur R. Choudry, DVM

62. AUDITOR SIGNATURE AND DATE

*Dr. Faizur R. Choudry*      09/01/03

United States Department of Agriculture  
Food Safety and Inspection Service

## Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Dumeco Beuningen, C.V. Zilverwerf 8 6641 TD Bueningen	2. AUDIT DATE Sept. 5, 2003	3. ESTABLISHMENT NO. Est. 124	4. NAME OF COUNTRY Netherlands
	5. NAME OF AUDITOR(S) Dr. M. Ghias Mughal		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	O
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	O
<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

Netherlands Establishment: 124

Date of Audit: September 5, 2003

61. NAME OF AUDITOR

Dr. M. Ghias Mughal

62. AUDITOR SIGNATURE AND DATE

*M. Ghias Mughal* 9/15/03

United States Department of Agriculture  
Food Safety and Inspection Service

## Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Zwanenberg Food Group B. V. Raalte	2. AUDIT DATE 09/08/03	3. ESTABLISHMENT NO. 153	4. NAME OF COUNTRY Netherlands
5. NAME OF AUDITOR(S) Dr. Faizur R. Choudry, DVM		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	X
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	O
<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	X
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

Establishment # 153      Dated 09/08/03

- 34.      Species testing Did Not include testing for the presence of beef. *(Limited to the presence of poultry)*
- 51.      RVV needs to strengthen its ability to enforce U.S. requirements.

61. NAME OF AUDITOR  
Dr. Faizur R. Choudry, DVM

62. AUDITOR SIGNATURE AND DATE

*Dr. Faizur R. Choudry*      9/08/03

United States Department of Agriculture  
Food Safety and Inspection Service

### Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION  Hendrix Meat Group C.V. Druten	2. AUDIT DATE 09/02/03	3. ESTABLISHMENT NO. 236	4. NAME OF COUNTRY Netherlands
5. NAME OF AUDITOR(S) Dr. Faizur R. Choudry, DVM			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	O
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	X
24. Labeling - Net Weights		52. Humane Handling	
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	
<b>Part D - Sampling Generic E. coli Testing</b>		55. Post Mortem Inspection	X
27. Written Procedures		<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis		56. European Community Directives	X
29. Records		57. Monthly Review	
<b>Salmonella Performance Standards - Basic Requirements</b>		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

Establishment # 236      Date 09/02/03

55, 56. The mesenteric lymph nodes were not palpated by the inspector during post mortem inspection of swine viscera. Council Directive 64/433 of June 26, 1964, Annex 1, Chapter VI 25(g) was not met.

51. Deficiencies regarding inadequate post mortem inspection procedures indicate insufficient government enforcement.

61. NAME OF AUDITOR  
Dr. Faizur R. Choudry, DVM

62. AUDITOR SIGNATURE AND DATE  
*Dr. Faizur R. Choudry* 09/02/03

United States Department of Agriculture  
Food Safety and Inspection Service

## Foreign Establishment Audit Checklist

1. Dumeco Apeldoorn B.V Apeldoorn, NL.	2. AUDIT DATE August 29, 03	3. ESTABLISHMENT NO. 312	4. NAME OF COUNTRY Netherlands
5. NAME OF AUDITOR(S)  Dr. M. Ghias Mughal		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.

	Audit Results		Audit Results
<b>Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements</b>		<b>Part D - Continued Economic Sampling</b>	
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	
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	
<b>Part D - Sampling Generic E. coli Testing</b>		55. Post Mortem Inspection	X
27. Written Procedures		<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis		56. European Community Directives	
29. Records		57. Monthly Review	
<b>Salmonella Performance Standards - Basic Requirements</b>		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

Netherlands Establishment No. 312

Date of Audit. August 29, 2003

55. The mesenteric lymph nodes were not palpated by the inspector during post mortem inspection of swine viscera. Council Directive 64/433 of June 26, 1964, Annex 1, Chapter VI 25(g) was not met.

61. NAME OF AUDITOR

Dr. M. Ghias Mughal

62. AUDITOR SIGNATURE AND DATE

United States Department of Agriculture  
Food Safety and Inspection Service

### Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Dumeco Helmond B. V. Helmond	2. AUDIT DATE 09/04/03	3. ESTABLISHMENT NO. 378	4. NAME OF COUNTRY Netherlands
5. NAME OF AUDITOR(S) Dr. Faizur R. Choudry, DVM		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	O
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	X
24. Labeling - Net Weights		52. Humane Handling	
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Park Skins/Moisture)		54. Ante Mortem Inspection	
<b>Part D - Sampling Generic E. coli Testing</b>		55. Post Mortem Inspection	X
27. Written Procedures		<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis		56. European Community Directives	X
29. Records		57. Monthly Review	
<b>Salmonella Performance Standards - Basic Requirements</b>		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

**Establishment #378      Date 09/04/03**

55, 56. The mesenteric lymph nodes were not palpated by the inspector during post mortem inspection of swine viscera. Council Directive 64/433 of June 26, 1964, Annex 1, Chapter VI 25(g) was not met.

51. Deficiencies regarding inadequate post mortem inspection procedures indicate insufficient government enforcement.

61. NAME OF AUDITOR  
Dr. Faizur R. Choudry, DVM

62. AUDITOR SIGNATURE AND DATE  
*Faizur R. Choudry* 09/04/03

United States Department of Agriculture  
Food Safety and Inspection Service

## Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Dumeco Doetinchem B.V. Doetinchem	2. AUDIT DATE 09/03/03	3. ESTABLISHMENT NO. 404	4. NAME OF COUNTRY Netherlands
	5. NAME OF AUDITOR(S) Dr. Faizur R. Choudry, DVM		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	O
<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/Park 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		

FSIS 5000-6 (04/04/2002)

60. Observation of the Establishment

Establishment #404

Dated 09/03/03

61. NAME OF AUDITOR

Dr. Faizur R. Choudry, DVM

62. AUDITOR SIGNATURE AND DATE

*Dr. Faizur R. Choudry* 09/03/03

United States Department of Agriculture  
Food Safety and Inspection Service

## Foreign Establishment Audit Checklist

<b>1. ESTABLISHMENT NAME AND LOCATION</b> Koel-en Vrieshuis Lintelo B.V. Lichtenvoorde	<b>2. AUDIT DATE</b> Sept. 3, 2003	<b>3. ESTABLISHMENT NO.</b> 451	<b>4. NAME OF COUNTRY</b> Netherlands
<b>5. NAME OF AUDITOR(S)</b> Dr. M. Ghias Mughal			<b>6. TYPE OF AUDIT</b> <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 0 if not applicable.

<b>Part A - Sanitation Standard Operating Procedures (SSOP)</b>	Audit Results	<b>Part D - Continued Economic Sampling</b>	Audit Results
<b>Basic Requirements</b>			
7. Written SSOP		33. Scheduled Sample	0
8. Records documenting implementation.		34. Species Testing	0
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	0
<b>Sanitation Standard Operating Procedures (SSOP)</b>		<b>Part E - Other Requirements</b>	
<b>Ongoing 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	0
25. General Labeling		53. Animal Identification	0
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	0
<b>Part D - Sampling</b>		55. Post Mortem inspection	0
<b>Generic E. coli Testing</b>		<b>Part G - Other Regulatory Oversight Requirements</b>	
27. Written Procedures	0	56. European Community Directives	
28. Sample Collection/Analysis	0	57. Monthly Review	
29. Records	0	58.	
<b>Salmonella Performance Standards - Basic Requirements</b>		59.	
30. Corrective Actions	0		
31. Reassessment	0		
32. Written Assurance	0		

FSIS 5000-6 (04/04/2002)

60. Observation of the Establishment  
Establishment No. 451

Date of Audit. September 3, 2003

61. NAME OF AUDITOR  
Dr. M. Ghias Mughal

62. AUDITOR SIGNATURE AND DATE

*m. Ghias mughal* 9/15/03

United States Department of Agriculture  
Food Safety and Inspection Service

## Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Roemaat Vrieshuis Kerkstraat 66, 7135 JM Harreveld	2. AUDIT DATE Sept.3, 2003	3. ESTABLISHMENT NO. 505	4. NAME OF COUNTRY Netherlands
5. NAME OF AUDITOR(S) Dr. M. Ghias Mughal		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	O
8. Records documenting implementation.		34. Species Testing	O
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	O
<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.	O	41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	O	42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.	O	43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.	O	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.	O	46. Sanitary Operations	
19. Verification and validation of HACCP plan.	O	47. Employee Hygiene	
20. Corrective action written in HACCP plan.	O	48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.	O	<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.	O	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)	O	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

Establishment No. 505

Date of Audit September 3, 2003

61. NAME OF AUDITOR

Dr. M. Ghias Mughal

62. AUDITOR SIGNATURE AND DATE

*m. Ghias mughal* 9/15/03

United States Department of Agriculture  
Food Safety and Inspection Service

## Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Lau Van Haren Weurt	2. AUDIT DATE Sept. 2, 2003	3. ESTABLISHMENT NO. 584	4. NAME OF COUNTRY Netherlands
	5. NAME OF AUDITOR(S) Dr. M. Ghias Mughal		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	O
8. Records documenting implementation.			34. Species Testing	O
9. Signed and dated SSOP, by on-site or overall authority.			35. Residue	O
<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.	O		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	O		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.	O		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.	O		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.	O		46. Sanitary Operations	
19. Verification and validation of HACCP plan.	O		47. Employee Hygiene	
20. Corrective action written in HACCP plan.	O		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.	O		<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.	O		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)	O		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

Establishment No. 584

Date of Audit. September 2, 2003

61. NAME OF AUDITOR

Dr. M. Ghias Mughal

62. AUDITOR SIGNATURE AND DATE

*m. Ghias mughal* 9/15/03

United States Department of Agriculture  
Food Safety and Inspection Service

### Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Vrieshuis Bussink Van Weerden Poelmanweg 5 7602 PC Almelo	2. AUDIT DATE Sept. 1, 2003	3. ESTABLISHMENT NO. Est. 589	4. NAME OF COUNTRY Netherlands
	5. NAME OF AUDITOR(S) Dr. M. Ghias Mughal		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	O
8. Records documenting implementation.		34. Species Testing	O
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	O
<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	O
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.	O	41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	O	42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.	O	43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.	O	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.	O	46. Sanitary Operations	
19. Verification and validation of HACCP plan.	O	47. Employee Hygiene	
20. Corrective action written in HACCP plan.	O	48. Condemned Product Control	O
21. Reassessed adequacy of the HACCP plan.	O	<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	O
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)	O	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	O
<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

NL Establishment: 589

Date of Audit: September 1, 2003

61. NAME OF AUDITOR

Dr. M. Ghias Mughal

62. AUDITOR SIGNATURE AND DATE

*Dr. Ghias Mughal*

9/15/03

United States Department of Agriculture  
Food Safety and Inspection Service  
Dr. Sally Stratmoen  
Director  
International Equivalence Staff  
Office of International Affairs  
Washington D.C. 20520  
U.S.A.  
fax:001-202-6904040



landbouw, natuur en  
voedselkwaliteit

Your letter of	your reference	our reference	date
Nov. 6, 2003		vva 04.50/hrt	12-01-2004
re:		extension no.	enclosures
comments on FSIS draft audit report		+31-70-3785133	

Dear Dr. Stratmoen,

Thank you for your letter of 6 November 2003.  
I am pleased to present my views on the draft final audit report, following an on-site meat inspection audit carried out by FSIS inspectors from 27 August to 11 September 2003. In the final meeting it was agreed that we could give our comments within 60 days after receipt of the draft report. We received the draft report on 17 November 2003.

*General*

I was glad to find the positive impression of the final meeting reflected in the report and in your letter.

- It is clear that our meat inspection system has convinced the audit team of the quality, the internationally accepted standards and the guaranteed safe production of meat in the Netherlands.
- We were glad to welcome the announcement in your letter that FSIS is reinstating RVV's authority to certify new establishments as being eligible to export meat to the United States.
- We have fortunately been able to clear up the misunderstanding about the Listeria monitoring programme, which is required for "ready to eat" products. In view of the fact that from this category of products the Dutch meat that is presently being exported to the US concerns canned sausages (which are fully sterilised), it was agreed with the FSIS-mission that these should not be subject to the Listeria monitoring programme.
- We have found the remarks made by the FSIS inspectors during their visit very helpful. They were made in a constructive manner, which was also much appreciated by the representatives of the meat establishments.

The report however refers to certain deficiencies under different headings, which might give the impression that the situation was worse than it actually was. A case in point is the non-palpation of mesenteric lymph nodes. This was considered a deficiency of the RVV and as a non-compliance with directive 54/433. It was also considered as one of the establishment's deficiencies.

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In the final meeting of 11 September however we explained that under Dutch policy palpation was not done for reasons of hygiene. The Dutch have written to the European Commission to explain this policy. It cannot therefore be considered as a deficiency of either RVV or AID.

*Clarifications relating to the draft report*

I hereby would like to present a number of clarifications to be used for adjustment/correction of the draft report:

- We would like to see reference made in the report to the swab protocol used by the Netherlands in the Salmonella sampling of carcasses rather than the cork borer protocol (p. 15.13.2).
- Also, with respect to non-palpation of the mesenteric lymph nodes, the report refers to three of the four slaughterhouses (p.15.11.5) whereas it should be all four (as it is on p. 16.3.5), as non-palpation is Dutch policy.

*Adjustments made to the Dutch system following the FSIS audit*

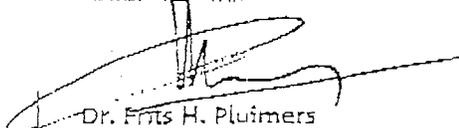
- Training of RVV staff working in US approved establishments is taking place on a permanent basis. In early December for instance another group of 20 staff enrolled in a course.
- The research organisation TNO is introducing a proficiency test and has been testing the products to be exported for the presence of poultry meat and beef since September 2003.
- At the RVV-lab (LRVV) a system is being worked out to do the proficiency test also on per person basis.
- Until further notice from USDA/FSIS the milk powder matrix is used for proficiency testing and the VIDAS protocol for salmonella screening.
- Listeria screening of canned sausages has been discontinued following the discussions we had with the inspection mission.
- After the inspection mission we have immediately set in motion the procedure to start to palpate mesenteric lymph nodes in the US approved establishments as required by the EU-directive. USDA/FSIS will in due course be presented with a scientifically based request to accept non-palpation as an equivalence measure.

*Other matters*

As a result of your reinstating RVV's authority to certify new establishments RVV has in the meantime added Dumeco Helmond, EEG 378, to the list of US approved establishments. Information about this new listing has already been communicated to FSIS.

Dear Dr. Stratmoen, I once again wish to express my positive feelings regarding your letter and the draft report and hope that the above remarks can be included in the final report.

Yours sincerely,  
CHIEF VETERINARY OFFICER



Dr. Frans H. Pluimers