



United States
Department of
Agriculture

Food Safety
and Inspection
Service

Washington, D.C.
20250

MAR 18 2004

Dr. Halldor Runolfsson
Chief Veterinary Officer
Ministry of Agriculture
Solvholgata 7
150 Reykjavik, Iceland

Dear Dr. Runolfsson:

This letter transmits the Food Safety and Inspection Service's (FSIS) final report of a meat inspection system audit conducted in Iceland from September 9 through September 19, 2003. Comments from the government of Iceland have been included in the final report. A copy of this report has been enclosed for your records.

FSIS appreciates the actions taken by the government of Iceland to correct the audit deficiencies. We will verify the corrective actions that you have taken upon our next visit to Iceland.

If you have any questions or need additional information, please contact me at 202-720-3781, by fax at 202-690-4040 or by email at sally.stratmoen@fsis.usda.gov.

Sincerely,

Sally Stratmoen, Director
International Equivalence Staff
Office of International Affairs

Enclosure

cc:

Roger Wentzel, Agricultural Counselor, US Embassy, The Hague
Borghildur Magnusdottir, FAS, US Embassy, Reykjavik
Linda Swacina, Deputy Administrator, FSIS
David Jaberg, Economic/Commercial Officer, US Embassy, Reykjavik
Gudni Bragason, Deputy Chief of Mission, Embassy of Iceland
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Todd Furey, IES, OIA
Country File

FINAL

MAR - 8 2004

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

SEPTEMBER 9 THROUGH SEPTEMBER 19, 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, the Ministry of Agriculture
DVO	District Veterinary Officer
<i>E. coli</i>	<i>Escherichia coli</i>
FSIS	Food Safety and Inspection Service
PR/HACCP	Pathogen Reduction/ Hazard Analysis and Critical Control Point Systems
SSOP	Sanitation Standard Operating Procedure(s)
<i>Salmonella</i>	<i>Salmonella</i> species

1. INTRODUCTION

The audit took place in Iceland from September 9 through September 19, 2003.

An opening meeting was held on September 9 in Reykjavik with the Central Competent Authority (CCA). At this meeting, the auditors confirmed the objective and scope of the audit, the audit itineraries, and requested additional information needed to complete the audit of Iceland's meat inspection system.

The auditors were accompanied during the entire audit by representatives from the CCA, the Ministry of Agriculture, and representatives from the regional and local inspection offices.

2. OBJECTIVE OF THE AUDIT

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

In pursuit of the objective, the following sites were visited: the headquarters of the CCA, two regional inspection offices, three laboratories performing analytical testing on United States-eligible product, and four slaughter and processing establishments.

Competent Authority Visits			Comments
Competent Authority	Central	4	Reykjavik
	Regional	4	Selfoss, Husavik, Blönduos, Hvammstangi
Laboratories		3	Residues and <i>E. coli</i>
Meat Slaughter & Processing Establishments		4	

3. PROTOCOL

This official 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 Iceland's inspection headquarters. The third part involved on-site visits to the four slaughter and processing establishments certified to export to the United States. The fourth part involved visits to one government and two private laboratories. The government-owned and -operated Icelandic Fisheries Laboratory in Reykjavik was conducting analyses of meat samples for heavy metals for Iceland's national residue control program. The private laboratory in Est. 22 in Hvammstangi was conducting analyses of samples collected in the same establishment for the presence of generic *Escherichia coli* (*E. coli*). The private Rannsóknarþjónustan Sýni ehf laboratory in Reykjavik was analyzing meat samples from Est. 81 for the presence of generic *E. coli*.

Program effectiveness determinations of Iceland's inspection system focused on five areas of risk: (1) sanitation controls, including the implementation and operation of Sanitation Standard Operating Procedures, (2) animal disease controls, (3) slaughter/processing controls, including the implementation and operation of HACCP programs and the testing program for generic *E. coli*, (4) residue controls, and (5) enforcement controls, including the testing program for *Salmonella* species. Iceland's inspection system was assessed by evaluating these five risk areas.

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

During the opening meeting, the auditor explained that Iceland's inspection system would be audited against two standards. First, the auditor would audit against FSIS requirements. These 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 FSIS' requirements for HACCP, SSOP, testing for generic *E. coli*.

Second, the auditor would audit against any equivalence determinations that have been made by FSIS for Iceland under provisions of the Sanitary/Phytosanitary Agreement.

Currently, FSIS has determined that one alternate procedure is equivalent to FSIS requirements. FSIS has agreed to allow Iceland to slaughter equines in the same establishment as lambs, provided that adequate separation is maintained.

4. LEGAL BASIS FOR THE AUDIT

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

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

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

The last FSIS audit of Iceland's inspection system was conducted in September 2002. The following deficiencies were identified:

- Verification procedures were inadequate in two of the four establishments. This was a repeat finding in one of these establishments. During the previous audit in October 2001, verification procedures were found to be inadequate in three of the five establishments then certified for U.S. export.
- Preventive measures were not recorded following a CCP failure in one establishment. This was a repeat finding in this establishment. During the previous audit in October 2001, this deficiency was identified in three of the five establishments certified for U.S. export.
- Post-mortem inspection deficiencies were found in all four establishments. These involved an abscess on a carcass in a cooler, feces on carcasses in coolers, and parts of adrenal glands not having been removed.
- Preventive measures were not documented for sanitation deficiencies in three establishments.
- The hazard analyses were found to be incomplete in two establishments.
- Documentation of corrective actions following failure to meet critical limits was inadequate in two establishments.
- Verification of the monitoring of critical limits was not being performed in one establishment.
- Black specks from overhead rails were observed on carcasses in coolers in two establishments.
- Blood was not cleaned from the sticking area between carcasses in two establishments` resulting in cross-contamination.
- Condensation problems were found in one establishment.
- Internal supervisory reviews were not being performed monthly, and the reports from the reviews that *had* been conducted were not available for audit in the establishments.

6. MAIN FINDINGS

6.1 Government Oversight

6.1.1 CCA Control Systems

The *Act on Veterinarians and Animal Health Services, No. 66/1998*, outlines the organization of the fourteen veterinary districts. The fourteen District Veterinarians are under the supervision of the Ministry of Agriculture, Chief Veterinary Office.

The staffing within these districts is as follows. In one of the establishments, the District Veterinarian has a staff of one Veterinarian in Charge of the establishment with two assistants. In the other three establishments, the District Veterinarian is the Veterinarian in Charge in the establishment; each of these veterinarians also has two assistants.

6.1.2 Ultimate Control and Supervision

The *Act on Veterinarians and Animal Health Services, No. 66/1998*, states that the responsibilities of the Chief Veterinary Officer include the management and monitoring of the work of district veterinarians, veterinary specialists, and other veterinarians having permits to work as (practicing) veterinarians.

The supervision of the District Veterinarians appeared to be adequate. However, communications between the central headquarters offices and the District Veterinarians were not uniform.

6.1.3 Assignment of Competent, Qualified Inspectors

In three of the four establishments, there were deficiencies in inspection controls regarding enforcement of FSIS requirements.

In one of four establishments, the Veterinarian-In-Charge did not have a clear understanding of FSIS requirements.

In two of the four establishments, the Veterinarians-In-Charge had had no specific HACCP training.

6.1.4 Authority and Responsibility to Enforce the Laws

The *Act on Veterinarians and Animal Health Services, No. 66/1998*, provides the Chief Veterinary Office with explicit authority over animal health matters and hygiene.

6.1.5 Adequate Administrative and Technical Support

Iceland's Ministry of Agriculture has adequate administrative and technical support and has the ability to support a third party audit.

6.2 Headquarters Audits

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

- Internal review reports,
- Supervisory visits to establishments that were certified to export to the U.S,

- New laws and implementation documents such as regulations, notices, directives and guidelines,
- Sanitation, slaughter and processing inspection procedures and standards,
- Export product inspection and control including export certificates, and
- Enforcement records, including examples of criminal prosecution, seizure and control of noncompliant product, and 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.

6.3.1 Audits of Regional Inspection Offices

The District Veterinary Officers (DVOs) in the three establishments farthest from Reykjavik serve as the Veterinarians-In-Charge of these establishments during lamb slaughter season (September-October). During the rest of the year, they are active in private veterinary practices. They do not have regional inspection offices other than their facilities in the establishments. In the fourth establishment, closer to Reykjavik, the Veterinarian-In-Charge is supervised by a DVO, who also does not have a specific regional inspection office. The Veterinarian-In-Charge was interviewed during the course of the establishment audit.

7. ESTABLISHMENT AUDITS

The FSIS auditors visited all four slaughter/processing establishments currently certified by Iceland as eligible to export to the United States. One was delisted by Iceland because of failure to meet basic U.S. requirements. One received a “Notice of Intent to Delist” from Iceland because of deficiencies involving SSOP and HACCP implementation. This establishment may retain its certification for export to the United States provided that all deficiencies noted during the audit are corrected within 30 days of the date the establishment was audited.

8. RESIDUE AND MICROBIOLOGY LABORATORY AUDITS

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

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

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

and check samples. If private laboratories are used to test United States samples, the auditor evaluates compliance with the criteria established for the use of private laboratories under the FSIS Pathogen Reduction/HACCP requirements.

The following laboratories were audited:

- The government-owned and -operated Icelandic Fisheries Laboratories in Reykjavik,
- The private Rannsóknarþjónustan Síni ehf laboratory in Reykjavik, and
- The private laboratory in Est. 22 in Hvammstangi.

The findings in these laboratories are discussed in Section 11.3 (Testing for generic *E. coli*), 12 (RESIDUE CONTROLS), and 13.2 (Testing for Salmonella species) of this report.

9. SANITATION CONTROLS

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

Based on the on-site audits of establishments, and except as noted below, Iceland's inspection system had controls in place for SSOP programs, all aspects of facility and equipment sanitation, the prevention of actual or potential instances of product cross-contamination, good personal hygiene practices, and good product handling and storage practices.

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

9.1 SSOP

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOP were met, according to the criteria employed in the U.S. domestic inspection program. The SSOP in three establishments were found to meet the basic FSIS regulatory requirements. In the other, the following basic deficiencies were identified:

- The dropped-meat reconditioning procedure was not included in the written SSOP.
- Edible-product containers and over-product structures were not included in routine pre-operational inspection.

Additionally, in two establishments, the following implementation deficiencies were identified:

- Maintenance and cleaning of over-product structures, equipment, and ceilings in two establishments, as well as processing and packaging equipment in one of these, had been neglected to varying degrees.
- One establishment's documentation of pre-operational and operational sanitation conditions did not reflect the conditions observed throughout the establishment during the audit.
- Documentation by establishment personnel of preventive measures in response to pre-operational and operational deficiencies was inadequate in one establishment. This was a repeat finding in this establishment.

9.2 Sanitation

The following deficiencies were also noted:

- In three establishments, light intensity at inspection stations was inadequate. FSIS requires 50 foot-candles, or 550 Lux, of shadow-free light on the surfaces to be inspected during post-mortem examination.
- Fecal contamination was found on a carcass in one lamb cooler. This was a repeat finding, in this establishment, from the FSIS audit in September 2002.
- In one establishment, an employee was not sterilizing his knife, as required, after contaminating it, before continuing to use it for carcass trimming.
- In one establishment, insanitary storage of exposed product was observed.
- In one establishment, there was inadequate cleaning of product-contact equipment before the start of operations.
- In one establishment, insanitary storage of product-contact equipment and materials was found.
- Personal hygiene deficiencies were observed in one establishment.
- In one establishment, large, unmarked containers of chemicals were found in the main chemical store.
- There was inadequate separation of work and street clothing in one establishment.

10. ANIMAL DISEASE CONTROLS

The second of the five risk areas that the FSIS auditor reviews is 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 auditor determined that Iceland's inspection system had adequate controls in place. No deficiencies regarding animal disease controls were observed in any of the four establishments.

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 auditors reviewed was Slaughter/Processing Controls. The controls include the following areas: ante-mortem inspection procedures, ante-mortem disposition, humane handling and humane slaughter, post-mortem inspection procedures, post-mortem disposition, and processing equipment and records.

The controls also include the implementation of HACCP systems in all establishments and implementation of a testing program for generic *E. coli* in slaughter establishments.

11.1 Humane Handling and Humane Slaughter

No deficiencies were noted.

11.2 HACCP Implementation

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

The HACCP programs were reviewed during the on-site audits of the four establishments. Three establishments had adequately implemented the basic HACCP requirements. In the other one, the following basic deficiencies were identified:

- No verification procedures were performed or included in the written HACCP plan.
- The description of the monitoring procedure in the written HACCP plan was inadequate. It did not include either the frequency of the monitoring of the CCP or the number of carcasses to be monitored.

Additionally, in two establishments, the following implementation deficiencies were identified:

- In one establishment, there were some verification activities for the monitoring of critical limits, but the written description of these procedures was vague, and the documentation of the verification was inadequate.

11.3 Testing for Generic *E. coli*

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

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

Testing for generic *E. coli* was properly conducted in three establishments. In one establishment, the following deficiency was noted:

- A statistical process control program had not been developed, as required, to evaluate the results of the testing for generic *E. coli*.

11.4 Testing for *Listeria monocytogenes*

Testing for *Listeria monocytogenes* was being performed where it was required.

12. RESIDUE CONTROLS

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

The government-owned and -operated Fisheries Laboratories in Reykjavik was audited. The following deficiencies were noted:

- On the day of the audit, no written corrective action program, for instances in which an analyst's proficiency does not meet expectations, was available. The project manager of the laboratory gave assurances that corrective actions are taken in this event, and stated that a written corrective action program was in the planning stages. It was completed within one week, prior to the final exit meetings.
- Several illegible corrections were observed in recent entries in the standards books.

The private Rannsóknarþjónustan Síni ehf laboratory in Reykjavik was audited. No deficiencies were noted.

The private laboratory in Est. 22 in Hvammstangi was audited. No deficiencies were noted.

Iceland's National Residue Testing Plan for 2003-04 was being followed and was on schedule.

13. ENFORCEMENT CONTROLS

The fifth of the five risk areas that the FSIS auditors 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 slaughter and processing establishments.

13.2 Testing for *Salmonella* Species

FSIS does not require testing for *Salmonella* species in lambs (minor species).

13.3 Species Verification

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

13.4 Monthly Reviews

During this audit it was found that in all establishments visited, monthly reviews of certified establishments were being performed and documented, as required, in all months in which U.S.-eligible production was conducted.

13.5 Inspection System Controls

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.

Furthermore, controls were in place for further processing, security items, shipment security, and products entering the establishments from outside sources.

The following deficiencies regarding enforcement were identified:

- Deficiencies were found in two of the four certified establishments (especially regarding SSOP and HACCP programs) that should have been identified and addressed by NZFSA/VA prior to this FSIS audit.

- In one establishment, the Veterinarian-In-Charge did not have a clear understanding of FSIS requirements.
- The Veterinarian-In-Charge in one establishment was unable to provide any documentation of his pre-operational sanitation inspections.
- The Veterinarians-In-Charge in two establishments were not documenting any evaluation of establishment compliance with FSIS requirements regarding the implementation of SSOP or HACCP procedures.
- The Veterinarian-In-Charge in one establishment had noted insufficient light in the reinspection area of the main lamb cooler, and no target date had been set for correction.
- Inedible product was not controlled adequately in one establishment.
- In three establishments, there appears to be a possible conflict-of-interest issue concerning outside employment of government inspectors. FSIS is evaluating the issue.

14. CLOSING MEETING

A closing meeting was held on September 19, 2003 in Reykjavik with the CCA. At this meeting, the primary findings and conclusions from the audit were presented by the lead auditor.

The CCA understood and accepted the findings.

 Gary D. Bolstad, DVM
International Audit Staff Officer


Don M. Carlson, DVM

15. ATTACHMENTS

Individual Foreign Laboratory Audit Form
Individual Foreign Establishment Audit Forms
Foreign country response to Draft Final Audit Report

REVIEW DATE

NAME OF FOREIGN LABORATORY

Sept. 11, 2003

Icelandic Fisheries Laboratories

A4. A-1a

FOREIGN COUNTRY LABORATORY REVIEW

FOREIGN GOV'T AGENCY

Iceland Ministry of Agriculture

CITY & COUNTRY

Reykjavik, Iceland

ADDRESS OF LABORATORY

Skúlgata 4

NAME OF REVIEWER

Dr. Gary D. Bolstad

NAME OF FOREIGN OFFICIAL

Dr. Sigurður Hansson, Deputy Chief Veterinary Officer

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

SIGNATURE OF REVIEWER

GBolstad

DATE

9/11/2003

FOREIGN COUNTRY LABORATORY REVIEW

(Comment Sheet)

REVIEW DATE

Sept. 11, 2003

NAME OF FOREIGN LABORATORY

Icelandic Fisheries Laboratories

A-1b

FOREIGN GOV'T AGENCY

Iceland Ministry of Agriculture

CITY & COUNTRY

Reykjavik, Iceland

ADDRESS OF LABORATORY

Skúlgata 4

NAME OF REVIEWER

Dr. Gary D. Bolstad

NAME OF FOREIGN OFFICIAL

Dr. Sigururður Hansson, Deputy Chief Veterinary Officer

RESIDUE

ITEM NO.

COMMENTS

NOTE: HM = heavy metals

HM	16	On the day of the audit, no written corrective action program, for instances in which an analyst's proficiency does not meet expectations, was available. The project manager of the laboratory gave assurances that corrective actions are taken in this event, and stated that a written corrective action program was in the planning stages; it was completed within one week, prior to the final exit meetings.
HM	19	Several illegible correction were observed in recent entries in the standards books. The project manager of the laboratory gave assurances that the requirement for legible corrections would be reinforced among the analysts.

A-2a

Sept. 11, 2003

Rannsóknarþjónustan Syni ehf

FOREIGN COUNTRY LABORATORY REVIEW

FOREIGN GOV'T AGENCY

Private; oversight by Min. of Agriculture

CITY & COUNTRY

Reykjavik, Iceland

ADDRESS OF LABORATORY

Lynghálsi 3

NAME OF REVIEWER

Dr. Gary D. Bolstad

NAME OF FOREIGN OFFICIAL

Dr. Sigurður Hansson, Deputy Chief Veterinary Officer

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

SIGNATURE OF REVIEWER

Dr. Gary D. Bolstad

DATE

9/11/2003

FOREIGN COUNTRY LABORATORY REVIEW*(Comment Sheet)*

REVIEW DATE

Sept. 11, 2003

NAME OF FOREIGN LABORATORY

Rannsóknarþjónustan Syni ehf

A-2b

FOREIGN GOV'T AGENCY

Private; oversight by Min. of Agriculture

CITY & COUNTRY

Reykjavik, Iceland

ADDRESS OF LABORATORY

Lynghálsi 3

NAME OF REVIEWER

Dr. Gary D. Bolstad

NAME OF FOREIGN OFFICIAL

Dr. Sigurður Hansson, Deputy Chief Veterinary Officer

RESIDUE

ITEM NO.

COMMENTS

No comments were necessary.

Sept. 17, 2003

Kaupfélag Vestur Húnavetninga (Est. 22)

A-3a

FOREIGN COUNTRY LABORATORY REVIEW

FOREIGN GOV'T AGENCY
 (Oversight by) Icelandic Ministry of
 Agriculture

CITY & COUNTRY
 Hvammstangi, Iceland

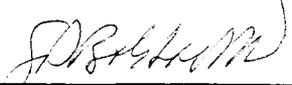
ADDRESS OF LABORATORY
 Strandgata 1
 531 Hvammstangi

NAME OF REVIEWER
 Dr. Gary D. Bolstad

NAME OF FOREIGN OFFICIAL
 Dr. Sigurður Hansson, Deputy CVO and Dr. Egill Gunnlaugsson, Vet-In-Charge

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

SIGNATURE OF REVIEWER



DATE

9/17/2003

FOREIGN COUNTRY LABORATORY REVIEW*(Comment Sheet)*

REVIEW DATE

Sept. 17, 2003

NAME OF FOREIGN LABORATORY

Kaupfélag Vestur Húnavtninga (Est. 22)

A-36

FOREIGN GOV'T AGENCY

(Oversight by) Icelandic Ministry of
Agriculture

CITY & COUNTRY

Hvammstangi, Iceland

ADDRESS OF LABORATORY

Strandgata 1
531 Hvammstangi

NAME OF REVIEWER

Dr. Gary D. Bolstad

NAME OF FOREIGN OFFICIAL

Dr. Sigurður Hansson, Deputy CVO and Dr. Egill Gunnlaugsson, Vet-In-Charge

RESIDUE

ITEM NO.

COMMENTS

No comments were necessary.

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Kaupfélag Vestur Húnavetninga Hvammstangi	2. AUDIT DATE Sep, 2003	3. ESTABLISHMENT NO. 22	4. NAME OF COUNTRY Iceland
5. NAME OF AUDITOR(S) Dr. Gary D. Bolstad		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	

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

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

60. Observation of the Establishment

B-16

Est. 22; Kaupfélag Vestur Húnavetninga; Hvammstangi, Iceland; September 17, 2003.

40/51 Light intensity of 50 foot-candles (fc) is required at inspection stations. The auditor measured light levels of 30 fc at the level of lamb carcass shoulders and viscera trays and 20 fc in abdominal cavities. The Ministry of Agriculture ordered installation of compliant lighting within 48 hours.

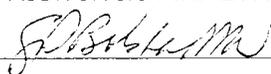
45 Several edible product containers had not been adequately cleaned before the start of operations. They were all thoroughly cleaned before being used. Also, several large plastic combo bins containing product had residues from the previous day's production; the product was reinspected, the containers cleaned, and a new policy implemented for using plastic liners in the bins.

Note: all deficiencies identified during the previous FSIS audit in September 2002 were adequately addressed and corrected.

61. NAME OF AUDITOR

Garv D. Bolstad, DVM

62. AUDITOR SIGNATURE AND DATE

 9/17/2003

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Sölefélag Austur - Húnavetninga Blönduós	2. AUDIT DATE Sep 16, 2003	3. ESTABLISHMENT NO. 23	4. NAME OF COUNTRY Iceland
5. NAME OF AUDITOR(S) Dr. Gary D. Bolstad		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		X	33. Scheduled Sample		
8. Records documenting implementation.			34. Species Testing		
9. Signed and dated SSOP, by on-site or overall authority.			35. Residue		X
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements			Part E - Other Requirements		
10. Implementation of SSOP's, including monitoring of implementation.		X	36. Export		
11. Maintenance and evaluation of the effectiveness of SSOP's.		X	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.		X	39. Establishment Construction/Maintenance		X
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements			40. Light		X
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.		X	42. Plumbing and Sewage		
16. Records documenting implementation and monitoring of the HACCP plan.			43. Water Supply		
17. The HACCP plan is signed and dated by the responsible establishment individual.			44. Dressing Rooms/Lavatories		
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements			45. Equipment and Utensils		X
18. Monitoring of HACCP plan.			46. Sanitary Operations		X
19. Verification and validation of HACCP plan.		X	47. Employee Hygiene		X
20. Corrective action written in HACCP plan.			48. Condemned Product Control		
21. Reassessed adequacy of the HACCP plan.			Part F - Inspection Requirements		
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.			49. Government Staffing		
Part C - Economic / Wholesomeness			50. Daily Inspection Coverage		
23. Labeling - Product Standards			51. Enforcement		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		
Part D - Sampling Generic E. coli Testing			55. Post Mortem Inspection		X
27. Written Procedures			Part G - Other Regulatory Oversight Requirements		
28. Sample Collection/Analysis		X	56. European Community Directives		O
29. Records			57. Monthly Review		
Salmonella Performance Standards - Basic Requirements			58.		
30. Corrective Actions		O	59.		
31. Reassessment		O			
32. Written Assurance		O			

60. Observation of the Establishment

B-2b

Est. 23, Sölefélag Austur – Húnavetninga; Blönduos, Iceland; September 16, 2003.

7/51 The dropped-meat reconditioning procedure was not included in the written SSOP.

7/10/51 Neither edible-product containers nor over-product structures were included in routine pre-operational inspection (see 39/51, below).

11/39/51 Maintenance and cleaning of over-product structures, equipment, and ceilings, as well as processing and packaging equipment, had been neglected to varying degrees (up to gross neglect) in numerous areas throughout the establishment. A large, open pipe was protruding downward from the ceiling of the sticking/bleeding area, and a large amount of fibrous insulation was hanging from the open pipe. There was a heavy buildup of old residues on a multi-storey cart and rods for smoking product. The floor of the suspect pen was covered with a heavy accumulation of old feces, caked dust, and discarded equipment. Trash, old pallets, and other discarded debris was stacked behind—and in contact with—the wall of one animal pen.

13/51 The establishment's documentation of pre-operational and operational sanitation conditions did not reflect the conditions observed throughout the establishment during this audit.

15/19/51 (A) No verification procedures were either included in the written HACCP plan or performed. (B) The written description of the monitoring procedure in the written HACCP plan was inadequate: it did not include either the frequency of the monitoring of the CCP or the number of carcasses to be monitored.

28/51 A statistical process control procedure had not been developed to evaluate the results of the sampling for E. coli.

35/51 Unmarked containers of chemicals were found in the main chemical store.

40/51 Light intensity of 50 foot-candles (fc) is required at inspection stations. The auditor measured light levels of 30 fc in viscera trays, 25 fc at the level of lamb carcass shoulders and less than 10 fc in abdominal cavities.

45 Clean knives ready for use were stored on a rusty magnet strip. Plastic carcass bags ready for use and carcass stocking material were stored in an unclean container.

46 Product (lamb hearts) in the freezer was not adequately covered; part of the product was uncovered, and there was excessive snow on the ceilings and other overhead structures. Other exposed product was observed in unclean plastic combo bins.

46/47 A container for inedible materials was observed to have been placed directly on the vacuum-packaging machine. When this was pointed out by the auditor, the foreman removed it and failed to wash his hands before returning to his duties.

47 Eight men's lockers of 48 reserved for street clothing contained white work clothing.

46/55 Fecal contamination was found on a carcass in the lamb cooler. This was a repeat finding from the last FSIS audit in September 2002.

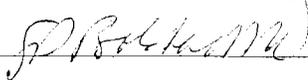
51 The Veterinarian-In-Charge was unable to provide any documentation of his pre-operational sanitation inspections. The Veterinarian-In-Charge had noted insufficient light in the reinspection area of the main lamb cooler, and no target date had been set for correction. The Veterinarian-In-Charge was not documenting any evaluation of establishment compliance with FSIS requirements regarding the implementation of SSOP or HACCP procedures.

NOTE: Following this audit, the Deputy Chief Veterinary Officer, who had observed the day's activities, determined that the establishment had failed to meet FSIS requirements and voluntarily delisted it (removed it from the list of establishments certified as eligible to export meat products to the USA), effective as of the start of operations on the day of this audit. The FSIS auditor was in complete agreement with this decision.

61. NAME OF AUDITOR

Garv D. Bolstad, DVM

62. AUDITOR SIGNATURE AND DATE



9/16/2003

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Norðlenska Husavik	2. AUDIT DATE Sep 15, 2003	3. ESTABLISHMENT NO. 31	4. NAME OF COUNTRY Iceland
5. NAME OF AUDITOR(S) Dr. Gary D. Bolstad		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	

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

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

60. Observation of the Establishment

B-3b

Est.31; Norðlenska; Husavik, Iceland; September 15, 2003.

46 The worker dropping the bung was observed to cut through the rectum and then the tail in one continuous operation without sterilizing his knife in between. The Ministry of Agriculture officials took immediate and effective corrective actions.

Note: all deficiencies identified during the previous FSIS audit (in September 2002) had been addressed and corrected.

61. NAME OF AUDITOR

Garv D. Bolstad, DVM

62. AUDITOR SIGNATURE AND DATE

Garv D. Bolstad

9/15/2003

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Sláturfélag Suðurlands svf. Selfoss, Iceland	2. AUDIT DATE Sep 10, 2003	3. ESTABLISHMENT NO. 81	4. NAME OF COUNTRY Iceland
5. NAME OF AUDITOR(S) Dr. Gary D. Bolstad		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	

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

60. Observation of the Establishment

B-4b

Est. 81, Slátúrfelag Suðurlands svf; Selfoss, Iceland; September 10, 2003.

10/39/51 Maintenance and cleaning of over-product structures (ceilings, pipes, and rail-support structures) had been neglected in several areas: rust, flaking paint, exposed insulation, and old product residues were observed. In one cooler, heavy condensation was observed over carcasses; the carcasses were moved promptly and the rail was rejected.

13/51 Documentation by establishment personnel of preventive measures in response to pre-operational and operational deficiencies was inadequate. This was a repeat finding in this establishment.

19/51 There were some verification activities for the monitoring of critical limits, but the written description of these procedures was vague, and the documentation of the verification was inadequate.

28/51 A statistical process control procedure had not been developed to evaluate the results of the sampling for generic *E. coli*. The upper limit being employed (0.2 cfu/cm^2) was recommended by the Municipal Food Control Authority. The management gave assurances that a statistical process control procedure would be developed immediately.

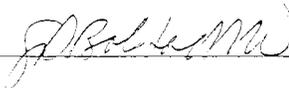
40/51 Light intensity of fifty foot-candles (fc), equivalent to 550 Lux, is required at the inspection surfaces at post-mortem inspection stations. The light was inadequate at all inspection stations: intensities of 40 fc (440 Lux) were measured in the lamb viscera trays, 30 fc (330 Lux) at the levels of the forequarters, and less than 5 fc (55 Lux) in abdominal cavities. The Ministry of Agriculture officials ordered installation of adequate light on the day of the audit, after the end of slaughter operations.

NOTE: Following a discussion of the day's findings, the Deputy Chief Veterinary Officer voluntarily issued to the establishment management a Letter of Intent to Delist if the abovementioned deficiencies are not corrected within 30 days of this audit. The FSIS auditor was in complete agreement with this decision.

61. NAME OF AUDITOR

Garv D. Bolstad, DVM

62. AUDITOR SIGNATURE AND DATE

 9/10/2003



CHIEF VETERINARY OFFICE

USDA, FSIS
Ms. Sally Stratmoen, Chief
1400 Independence Ave, SW
Washington D.C.
20250
USA

Sölvhólsgrata 7 - 150 Reykjavík - Iceland
Tel.: (354) 545 9750, fax: (354) 552 1160
www.cvo.is

Reykjavík, January 12, 2004
Ref: YDL03070024/511
HR/söh

Dear Ms. Sally Stratmoen

I refer to your letter dated Dec 2 2003 which I received on December 12, 2003.

It is the intention of the government of Iceland to meet US requirements regarding US approved meat establishments. In order to do this improvements must be made in the following fields of competence:

- the knowledge of the industry employees and governmental inspectors on SSOP and HACCP
- implementation of SSOP and HACCP in meat establishments
- the procedures for governmental oversight in US approved meat establishments
- the training of the governmental inspectors in auditing

The Chief Veterinary Officer in Iceland has prepared the following action plan to ensure that certified establishments meet U.S. import requirements:

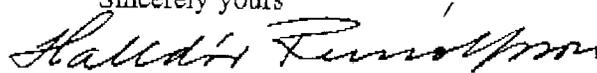
1. A course on SSOP and HACCP implementation for district veterinary officers and veterinarians in charge in the establishments and for the quality managers in the establishments was arranged on November 19th and 20th 2003. Lecturers were Mr. Alistair Booth from Food Standards Agency in UK and Dr. Olafur Oddgeirsson Food Control Consultants, Scotland.
2. A meeting with food scientists from MATRA, which is a governmental food science institute in Reykjavík, with knowledge and experience in running courses for the industry regarding food hygiene and safety. The plan is to establish a series of courses for the personnel of the industry on SSOP and HACCP in the meat industry.
3. A meeting with the board of the Association of the slaughterhouse owners regarding financing of the educational program developed by MATRA, see point 3.
4. The CVO has written a letter to the establishments and pointed out their responsibility regarding meeting the US requirements.
5. The CVO has required the US approved establishments to revise thoroughly their SSOP and HACCP plans before the start of the next lamb slaughtering season in September 2004.
6. The CVO has required the US approved establishments to improve the cleaning and

- the maintenance of the buildings and equipment.
7. A veterinary inspector from the headquarters of Icelandic Veterinary Services will audit the US approved establishments regularly in addition to the inspection of the district veterinary officers.
 8. It is planned to make written procedures for how the governmental oversight shall be performed, both for the headquarters, district officers and the plant veterinarians.
 9. In order to gain valuable experience we would be very interested to be able to visit some federal approved meat establishments in the US. We will write you a special letter asking for this visit.
 10. We plan to arrange a theoretical and practical course for our governmental veterinary inspectors in auditing meat establishments in early June 2004. For this course we are looking for a lecturer that is knowledgeable about US requirements, probably from United States, United Kingdom or from Denmark.

Regarding establishment no 81 I refer to my earlier letter of October 10 2003 (Ref. YDL03070024/511) concerning corrective actions and preventive measures in the establishment. However a special visit to the plant is planned in week 6 to reassure that they are operating according to US requirements. Nevertheless, I wish to point out that there is for the moment no export to US market from establishment no 81.

We would appreciate if we could discuss these steps with FSIS specialists. If you need any further information or if you have any comments please contact us.

Sincerely yours



Halldor Runólfsson
Chief Veterinary Officer

