



United States Department of Agriculture

Food Safety and
Inspection Service

JUN 11 2018

1400 Independence
Avenue, SW.
Washington, D.C.
20250

Dr. Michel Bellaiche
Director, Israeli Veterinary Services and Animal Health
Ministry of Agriculture and Rural Development
Post Office Box 12, Beit Dagan, 50250, Israel

Dear Dr. Bellaiche,

The Food Safety and Inspection Service (FSIS) conducted an ongoing on-site equivalence verification audit of Israel's poultry products inspection system from January 10 through January 24, 2018. Enclosed is a copy of the final audit report. The comments received from the Government of Israel are included as an attachment to the report.

FSIS is continuing to evaluate your response and may request additional information regarding Israel's inspection procedures related to verification of establishment HACCP systems. Once this evaluation is completed, FSIS will notify you as to whether Israel's poultry products inspection system remains equivalent to that of the United States.

For any questions regarding the FSIS final audit report, please contact us at (202) 708-9543, or by electronic mail at internationalcoordination@fsis.usda.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Todd Furey", written over a circular stamp or mark.

Todd Furey
Acting International Coordination Executive
Office of International Coordination

Enclosure

FINAL REPORT OF AN AUDIT CONDUCTED IN
ISRAEL

JANUARY 10-24, 2018

EVALUATING THE FOOD SAFETY SYSTEMS GOVERNING
PROCESSED POULTRY PRODUCTS
EXPORTED TO THE UNITED STATES OF AMERICA

June 8, 2018

Food Safety and Inspection Service
United States Department of Agriculture

Executive Summary

This report describes the outcome of an onsite equivalence verification audit conducted by the Food Safety and Inspection Service (FSIS) from January 10-24, 2018. The purpose of the audit was to determine whether Israel's food safety system governing ready-to-eat (RTE), processed poultry products remains equivalent to that of the United States, with the ability to export products that are safe, wholesome, unadulterated, and correctly labeled and packaged. Israel currently exports RTE fully cooked, not shelf stable, poultry (chicken and turkey) products to the United States.

The audit focused on six system equivalence components: (1) Government Oversight (e.g., Organization and Administration); (2) Government Statutory Authority and Food Safety and Other Consumer Protection Regulations (e.g., Inspection System Operation, Product Standards and Labeling, and Humane Handling); (3) Government Sanitation; (4) Government Hazard Analysis and Critical Control Points (HACCP) System; (5) Government Chemical Residue Testing Programs; and (6) Government Microbiological Testing Programs.

An analysis of each equivalence component did not identify any deficiencies that represented an immediate threat to public health. The FSIS auditors identified the following findings:

Government Oversight (e.g., Organization and Administration)

- Israel uses in-plant inspection personnel hired and assigned by the Egg and Poultry Board (EPB) to perform all aspects of carcass inspection, including final carcass disposition during post-mortem inspection of the poultry product destined for export to the United States. This practice does not meet FSIS' requirements that a government inspector or contract employee under the supervision of a government inspector perform these inspection activities.
- There is a conflict of interest between some of the EPB's members and the EPB's hired in-plant inspection personnel who conduct inspection activities in the poultry slaughter establishments eligible to produce poultry products for export to the United States.

During the audit exit meeting, the Central Competent Authority (CCA) committed to address the preliminary findings as presented. FSIS will evaluate the adequacy of the CCA's documentation of proposed corrective actions and base future equivalence verification activities on the information provided.

TABLE OF CONTENTS

I.	INTRODUCTION.....	1
II.	AUDIT OBJECTIVE, SCOPE, AND METHODOLOGY.....	1
III.	BACKGROUND.....	3
IV.	COMPONENT ONE: GOVERNMENT OVERSIGHT (E.G., ORGANIZATION AND ADMINISTRATION).....	3
V.	COMPONENT TWO: GOVERNMENT STATUTORY AUTHORITY AND FOOD SAFETY AND OTHER CONSUMER PROTECTION REGULATIONS (E.G., INSPECTION SYSTEM OPERATION, PRODUCT STANDARDS AND LABELING, AND HUMANE HANDLING).....	6
VI.	COMPONENT THREE: GOVERNMENT SANITATION.....	9
VII.	COMPONENT FOUR: GOVERNMENT HAZARD ANALYSIS AND CRITICAL CONTROL POINTS (HACCP) SYSTEM.....	10
VIII.	COMPONENT FIVE: GOVERNMENT CHEMICAL RESIDUE TESTING PROGRAMS.....	12
IX.	COMPONENT SIX: GOVERNMENT MICROBIOLOGICAL TESTING PROGRAMS.....	13
X.	CONCLUSIONS AND NEXT STEPS.....	15
	APPENDICES.....	16
	Appendix A: Individual Foreign Establishment Audit Checklists	
	Appendix B: Foreign Country Response to the Draft Final Audit Report (Once available)	

I. INTRODUCTION

The Food Safety and Inspection Service (FSIS) of the United States Department of Agriculture (USDA) conducted an onsite audit of Israel's food safety system from January 10-24, 2018. The audit began with an entrance meeting held on January 10, 2018, in Beit Dagan, Israel, during which the FSIS auditors discussed the audit objective, scope, and methodology with representatives from the Central Competent Authority (CCA) – Israeli Veterinary Services and Animal Health (IVSAH) and USDA's Foreign Agriculture Service (FAS). Representatives from the CCA accompanied the FSIS auditors throughout the entire audit.

II. AUDIT OBJECTIVE, SCOPE, AND METHODOLOGY

This was a routine ongoing equivalence verification audit. The audit objective was to determine whether the food safety system governing processed poultry products remains equivalent to that of the United States, with the ability to export products that are safe, wholesome, unadulterated, and correctly labeled and packaged. Israel is eligible to export Ready-to-Eat (RTE) processed poultry (chicken and turkey) products to the United States. The USDA's Animal and Plant Health Inspection Service (APHIS) has restrictions in place for Israel due to highly pathogenic avian influenza and exotic Newcastle disease.

FSIS applied a risk-based procedure that included an analysis of country performance within six equivalence components, product types and volumes, frequency of prior audit-related site visits, Point-of-Entry (POE) testing results, specific oversight activities of government offices, and testing capacities of laboratories. The review process included an analysis of data collected by FSIS over a three-year period, in addition to information obtained directly from the CCA, through the Self-Reporting Tool (SRT).

Determinations concerning program effectiveness focused on performance within the following six components upon which system equivalence is based: (1) Government Oversight (e.g., Organization and Administration); (2) Government Statutory Authority and Food Safety and Other Consumer Protection Regulations (e.g., Inspection System Operation, Product Standards and Labeling, and Humane Handling); (3) Government Sanitation; (4) Government Hazard Analysis and Critical Control Points (HACCP) System; (5) Government Chemical Residue Testing Programs; and (6) Government Microbiological Testing Programs.

The FSIS auditors reviewed administrative functions at the CCA headquarters, two regional offices, and seven local inspection offices at the audited establishments, one private microbiological laboratory, and one government chemical residue and microbiological laboratory. The FSIS auditors evaluated the implementation of management control systems in place that ensure the national system of inspection, verification, and enforcement is being implemented as intended. This evaluation included onsite verification of the implementation of those corrective actions proffered to FSIS by Israel to remedy the December 2015 audit findings.

The FSIS auditors also reviewed the administrative functions of the local inspection offices as part of the establishment review. The FSIS auditors assessed the CCA's sampling and testing methodology through a review of records at the regional inspection offices and two audited

laboratories. The FSIS auditors visited seven establishments from nine establishments certified as eligible to export to the United States. These included three poultry slaughter establishments (two chicken/turkey and one chicken) and four poultry processing establishments (two chicken/turkey, one turkey, and one chicken) that produce fully cooked, not shelf stable, RTE poultry products for export to the United States.

During the establishment visits, the FSIS auditors paid particular attention to the extent to which industry and government interacted to control hazards and prevent noncompliance that threatens food safety. The FSIS auditors examined the CCA’s ability to provide oversight through supervisory reviews conducted in accordance with FSIS equivalence requirements for foreign inspection systems outlined in Title 9 of the United States Code of Federal Regulations (9 CFR) §381.196.

The FSIS auditors visited one government (microbiological and chemical residue) laboratory and one private microbiological laboratory to verify their ability to provide adequate technical support to the inspection system.

Competent Authority Visits		#	Locations
Competent Authority	Central	1	<ul style="list-style-type: none"> Israeli Veterinary Services and Animal Health, Beit Dagan
	Regional	2	<ul style="list-style-type: none"> North Regional Veterinary Office, Haifa South Regional Veterinary Office, Beit Dagan
Laboratories		2	<ul style="list-style-type: none"> Kimron Veterinary Institute, Beit Dagan (Government Laboratory) <ul style="list-style-type: none"> Microbiological Department Chemical Residue Department Institute for Food Microbiology, Haifa (Private Laboratory) <ul style="list-style-type: none"> Microbiological Department
Poultry slaughter establishments		3	<ul style="list-style-type: none"> Establishment 8, Off-Tov (Shan) Hodu Tov (Shan) Ltd., Beit-Shean Valley Establishment 20, Kornish Chen (1987) Ltd., Hanegev Establishment 35, Off Oz Marketing Ltd., Beer Sheva
Poultry processing establishments		4	<ul style="list-style-type: none"> Establishment 22, Tiv-Tirat-Zvi (2000), Meat Specialties, Kibbutz Tirat-Tsvi Establishment 104, Maadaney Yehiam (1993) Ltd., Kibutz Yehiam Establishment 108, Off-Tov Products (2001) Ltd., Beit-Shean Establishment 209, Tnuva Galil, Inc., Kiryat Shmona

FSIS performed the audit to verify that Israel’s food safety system was equivalent to FSIS’ system regarding specific provisions of United States’ laws and regulations, in particular:

- The Poultry Products Inspection Act (21 U.S.C. 451 *et seq.*); and
- The Poultry Products Inspection Regulations (9 CFR Part 381).

The audit standards applied during the review of Israel's inspection system for slaughter and processed poultry included: (1) all applicable laws and procedures submitted to FSIS and determined to be equivalent as part of the initial review process, and (2) any subsequent equivalence determinations that have been made by FSIS under provisions of the World Trade Organization's Sanitary/Phytosanitary Agreement. Israel has implemented HACCP, Sanitation Standard Operating Procedures (Sanitation SOPs), and Sanitation Performance Standards (SPS) requirements consistent with FSIS regulations.

III. BACKGROUND

Israel currently exports RTE processed poultry products to the United States. From December 1, 2015 to January 25, 2018, FSIS import inspectors performed 100 percent POE reinspection for labeling and certification on 2,834,959 pounds of RTE fully cooked, not shelf stable, chicken products and 3,331,892 pounds of RTE fully cooked, not shelf stable, turkey products exported by Israel to the United States. Of that these amounts, additional types of inspection were performed on 505,387 pounds of chicken and 571,935 pounds of turkey including testing for chemical residues and Salmonella. A total of 14,252 pounds of chicken and 6755 pounds of turkey were rejected. For chicken, 14,252 pounds were rejected for shipping damage, label, and certification verification issues. For turkey, 4613 pounds were rejected for foreign material (plastic pieces); 1,829 pounds of turkey due to the presence of *Listeria monocytogenes (Lm)*, and 313 pounds of turkey were shipping damage, label, and certification verification issues.

The previous FSIS audit in 2015 identified isolated findings related to SPS issues (i.e., the presence of beaded condensate, flaking paint, and small holes on overhead structures) at three of the six audited establishments, however, there was no direct product contamination or adulteration of products observed. The current audit included visits to some of the same establishments; therefore, the FSIS auditors were able to verify that proffered corrective actions to all previous findings had been adequately addressed.

The evaluation of all six equivalence components included a review and analysis of documentation previously submitted by the CCA as support for the responses provided in the SRT. The FSIS onsite audit included record reviews, interviews, and observations made by the FSIS auditors.

The FSIS final audit reports for Israel's food safety system are available on the FSIS Web site at: <http://www.fsis.usda.gov/wps/portal/fsis/topics/international-affairs/importing-products/eligible-countries-products-foreign-establishments/foreign-audit-reports>

IV. COMPONENT ONE: GOVERNMENT OVERSIGHT (E.G., ORGANIZATION AND ADMINISTRATION)

The first of six equivalence components that the FSIS auditors reviewed was Government Oversight. FSIS import regulations require the foreign inspection system to be organized by the national government in such a manner as to provide ultimate control and supervision over all official inspection activities; ensure the uniform enforcement of requisite laws; provide sufficient administrative technical support; and assign competent qualified inspection personnel at

establishments where products are prepared for export to the United States at least once per shift at processing establishments and on the line during all slaughter operations.

The FSIS auditors verified that the Ministry of Agriculture and Rural Development (MARD) has the overall responsibility for policy, legislation, and implementation of official controls relating to food safety. In accordance with the current organization of MARD, IVSAH is the CCA, which has the responsibility for carrying out Israel's poultry inspection program, including oversight and enforcement of regulatory requirements in poultry producing establishments certified as eligible to export to the United States.

IVSAH's administration of the poultry inspection system is divided into national, regional, and establishment levels. At the national level, the director of IVSAH, the Chief Veterinary Officer (CVO), is responsible for issuing laws, guidelines, and instructions for implementation of official controls over production of poultry products. The Department of Control of Animal Products within IVSAH is headed by the Chief Veterinarian, who is responsible for providing technical guidance and supervising the functions of official inspection personnel at regional and local levels.

At the regional level, two offices, North Region (Haifa) and South Region (Beit Dagan), oversee inspection activities in the establishments certified as eligible to export to the United States. The Regional Veterinary Officers (RVOs) who supervise the overall inspection activities of the inspection personnel at the local level head each region. The RVOs are also responsible for conducting periodic supervisory reviews at all establishments certified as eligible to export to the United States. The FSIS auditors verified that the inspection personnel located at the IVSAH headquarters and regional level offices are full-time veterinarians employed by the national government.

At the establishment level, the inspection personnel consist of a Veterinarian-in-Charge (VIC) and a number of non-veterinary inspectors. At the establishments certified as eligible to export to the United States, the non-veterinary inspectors perform daily official controls and inspection activities within poultry slaughter or processing establishments under direct supervision of the VICs. In the poultry RTE processing establishments, the VICs and non-veterinary inspectors are salaried employees of the local government. The local government collects inspection related fees from the poultry processing establishments for the payment of inspection services rendered by VICs and non-veterinary inspectors in these establishments.

The FSIS auditors performed onsite observations and reviewed records maintained by inspection personnel at headquarters and inspection offices within establishments certified as eligible to export to the United States. Officials used the authority of the laws of Israel to enforce the rules of the poultry inspection system, identified and documented noncompliance, and verified the adequacy of corrective actions and preventive measures. Israel's national laws including *Control of the Manufacture of Poultry Products for Export and Import and Export of Animal Products* authorizes IVSAH to approve and certify establishments as eligible to export to the United States; to conduct inspection activities in these establishments; and to enforce penalties for violations of food safety laws.

The FSIS auditors verified that IVSAH has maintained its legal authority and responsibility to certify or to suspend and withdraw export certification of establishments certified as eligible to export to the United States. The FSIS auditors reviewed the IVSAH approval process for poultry establishments that apply to be designated as establishments that are certified to export to the United States. These establishments must operate under a HACCP system in accordance with IVSAH's requirements. Following the submission of an establishment's application, the inspection personnel review and conduct an onsite inspection. IVSAH has the authority to approve the application considering the results of the document review, onsite audits, and implementation of any applicable corrective actions.

The FSIS auditors verified that in-plant inspection personnel, VICs, and non-veterinary inspectors in all poultry slaughter establishments are salaried employees of a government statutory body, the Egg and Poultry Board (EPB). The EPB collects inspection-related fees from the poultry slaughter establishments for the payment of inspection services rendered by VICs and non-veterinary inspectors in these establishments. The legal basis for the formation of the EPB was established by the law "*Egg and Poultry Board - Production and Marketing*" of 1963. The main purpose of the EPB is to promote the poultry sector and its products (poultry meat, table eggs, and other products). The EPB is currently composed of 47 members. This includes eight government representatives (i.e., four members from MARD, of which one is the chairperson; three members from the Ministry of Economy and Industry, of which one is the vice-chairman; and one member from the Ministry of Finance). The other EPB members are as follows: nine representatives of the poultry wholesale trade, two representatives of the poultry retail trade, four representatives of consumers, and 24 representatives of poultry and egg farmers.

The 1963 law prohibits the EPB from interfering with the inspection activities conducted in the poultry slaughter establishments. Therefore, the EPB should only act as a platform for the employment of the VICs and non-veterinary inspectors in the poultry slaughter establishments. The FSIS auditors noted that IVSAH's head of the Veterinary Services or their designee is responsible for issuing annual accreditation for both VICs and non-veterinary inspectors. IVSAH's accreditation authorizes the assignments of these personnel at the poultry slaughter establishments. The VICs assigned to poultry slaughter or processing establishments must possess a veterinary degree and a professional license issued by the Director of IVSAH to be considered qualified for annual accreditation.

The FSIS auditors noted that specific tasks of the VICs and non-veterinary inspectors assigned to the poultry slaughter establishments consist of conducting daily ante-mortem and post-mortem inspections, as well as, the authority to pass or condemn carcasses and parts; verification of Good Commercial Practices (GCPs); verification of establishments' HACCP, sanitation, and other prerequisite programs; and official chemical residue and microbiological sampling. The VICs enter the results of the daily inspection verification into IVSAH's "Food Inspection Web Application." IVSAH also disseminates inspection information including updates related to the United States export requirements via the "Food Inspection Web Application." IVSAH veterinarians in the headquarters and regional levels have direct access to all inspection data collected in this application to ensure uniform implementation or proper enforcement of the regulatory requirements.

The RVOs are responsible for conducting both periodic supervisory reviews and performance appraisals of the in-plant VICs. Based on the satisfactory results of these performance appraisals, IVSAH issues annual veterinary accreditation certificates for VICs assigned in slaughter or processing establishments.

The FSIS auditors identified the following findings:

- Israel uses in-plant inspection personnel hired and assigned by the EPB to perform all aspects of carcass inspection, including final carcass disposition during post-mortem inspection of the poultry product destined for export to the United States. This practice does not meet FSIS' requirements that a government inspector or contract employee under the supervision of a government inspector perform these inspection activities.
- There is a conflict of interest between some of the EPB's members and the EPB's hired in-plant inspection personnel who conduct inspection activities in the poultry slaughter establishments eligible to produce poultry products for export to the United States.

The FSIS auditors also verified that IVSAH maintains administrative and technical support to operate its laboratory system. The FSIS auditors verified that the CCA relies on the Israel Laboratory Accreditation Authority (ISRAC) that conducts accreditation audits of laboratories in accordance with the International Organization for Standardization (ISO) to ensure that each laboratory possesses the personnel, facilities, equipment, and methods necessary to fulfill the ISO 17025 "*General requirements for the competence of testing and calibration laboratories*" requirements. The FSIS auditors reviewed the results of the accreditation audits for those laboratories conducting testing of product destined for export to the United States. The FSIS auditors reviewed laboratory records and interviewed the laboratory analysts to assess their technical competency, training, and knowledge of the analytical methods. These reviews did not identify any concerns.

The IVSAH maintains both legal authority and a regulatory framework to implement its regulatory requirements. However, the use of EPB salaried employees to conduct all aspects of carcass inspection when eligible slaughter establishments are producing poultry products for export to the United States does not meet FSIS' statutory requirements that these activities should be conducted by a government inspector or contract employee under the supervision of a government inspector.

V. COMPONENT TWO: GOVERNMENT STATUTORY AUTHORITY AND FOOD SAFETY AND OTHER CONSUMER PROTECTION REGULATIONS (E.G., INSPECTION SYSTEM OPERATION, PRODUCT STANDARDS AND LABELING, AND HUMANE HANDLING)

The second of six equivalence components that the FSIS auditors reviewed was Government Statutory Authority and Food Safety and Other Consumer Protection Regulations. The system is to provide for GCPs of poultry; ante-mortem inspection of animals; post-mortem inspection of carcasses and parts; controls over condemned materials; controls over establishment construction, facilities, and equipment; inspection at least once per shift during processing operations and on-line inspection during slaughter operations; and periodic supervisory visits to official establishments.

The primary laws for regulating poultry inspection in Israel have not changed, they are *Animal Diseases Regulations (Poultry Slaughterhouses)*; *Business Licensing Regulations (Sanitary Conditions for Food Production Businesses)*; and *Regulations for the Control of the Manufacture of Poultry Products for Export and Their Export*. These laws provide the operational and regulatory authority to carry out Israel's poultry inspection system. In addition, IVSAH has developed written procedural documents known as "Procedures Sheets (PSs)" in order to provide updates and clear instructions to its inspection personnel regarding consistent application of national laws and proper inspection verification procedures. The FSIS auditors verified the proper implementation of PSs including those related to the performance of ante-mortem inspection, post-mortem inspection, HACCP verification tasks, sanitation verification tasks, microbiological and chemical residue sampling, and periodic supervisory reviews.

The FSIS auditors' review of the inspection regulations concerning the registration of slaughter or processing establishments, inspection verification activities, and implementation of the United States export requirements indicated that IVSAH has legal authority and responsibility to enforce inspection laws and to ensure that adulterated or misbranded products are not exported to the United States. The FSIS auditors confirmed that IVSAH has the authority to take enforcement actions and impose fines.

The FSIS auditors assessed ante-mortem and post-mortem inspection examinations through onsite record reviews, interviews, and observations of the in-plant inspection personnel performing ante-mortem and post-mortem examinations in the audited poultry slaughter establishments. The FSIS auditors observed and verified that the in-plant inspection personnel are following ante-mortem and post-mortem inspection procedures in accordance with IVSAH's requirements. IVSAH's ante-mortem inspection of poultry includes a review of the flock sheet documents followed by an onsite VIC's visual examination of birds in shipping crates either on the transport vehicle or in the staging area in addition to verification of the proper poultry handling during the ritual slaughter.

The FSIS auditors noted that the audited poultry slaughter establishments meet IVSAH's regulatory requirements for maximum line speed for chicken (35 birds per minute per inspector) and turkey (15 birds per minute per inspector) when optimum conditions exist. The VIC has the authority to reduce the line speed when there are less than optimum conditions. The FSIS auditors also noted that in-plant inspection personnel conduct on-line post-mortem inspection on a bird-by-bird basis on all poultry eviscerated in all audited establishments. Furthermore, the FSIS auditors verified that each audited slaughter establishment meet post-mortem inspection facility requirements, including having a distortion-free mirror, sufficient shadow-free lighting, on-line hand rinsing facilities, hang back racks, a receptacle for condemned carcasses and parts, and start/stop switches.

During the onsite audit of the establishments, the FSIS auditors verified that daily inspection is conducted at least once per shift during processing operations and on-line inspection occurs continuously during slaughter operations when establishments are producing product for export to the United States. The FSIS auditors interviewed the inspection personnel; reviewed in-plant inspection generated verification records; and observed the functions of the in-plant inspectors

while conducting their daily inspection verification activities. These daily verification activities included direct observation of the production process and review of the establishment records, including HACCP (monitoring, verification, and corrective actions), Sanitation SOP, SPS, and microbiological sampling techniques and records.

Since 2015, IVSAH has organized ongoing training programs for inspection personnel assigned in the establishments certified as eligible to export to the United States. There were five in-class trainings for VICs and one for non-veterinary inspectors in 2017. The training curriculum for VICs covered a range of subjects such as Pathogen Reduction/HACCP, sanitation, *Salmonella* and *Campylobacter* sampling methodology, and specific export requirements concerning United States equivalence. The non-veterinary inspector training focused on post-mortem inspection examinations. The FSIS auditors interviewed a number of the inspection personnel to assess their knowledge, skills, and abilities in conjunction with review of their training-related records. The FSIS auditors confirmed that inspection personnel have attended the ongoing trainings courses in performing government inspection activities.

The FSIS auditors verified through document review and interviews that IVSAH provided an appropriate number of the inspection personnel to conduct inspection, during the entire shift and for all shifts, when poultry products are slaughtered and processed for export to the United States. IVSAH maintained procedures to provide adequate inspection coverage during vacations, illnesses, or other unforeseeable absences.

The FSIS auditors also reviewed noncompliance reports (NRs) that were generated by the in-plant inspection personnel at all seven audited establishments. FSIS noted that the inspection personnel identified and documented deficiencies in NRs using a similar format as FSIS' NRs. The inspection personnel closed the NRs after verifying the adequacy and effectiveness of the establishment's corrective actions and preventive measures. The FSIS auditors reviewed a sample of all open and closed NRs and determined that the inspection personnel have described noncompliance and verified the effectiveness of the establishment's corrective actions.

The FSIS auditors accompanied and observed the functions of the RVOs who are responsible for conducting the periodic supervisory reviews with a minimum frequency of one supervisory review per quarter in accordance with IVSAH's instructions. During the periodic supervisory reviews, the RVOs verify the proper implementation of IVSAH's requirements by the in-plant inspection personnel. This includes verification of ante-mortem and post-mortem inspection, microbiological sampling including *Salmonella* and *Campylobacter* sample collection in raw product (poultry slaughter establishments), microbiological verification sampling including *Lm* and *Salmonella* sample collections in RTE product (poultry processing establishments), and verification of pre-operational and operational sanitation monitoring procedures, and HACCP verification activities including the review of Critical Control Points (CCPs). The FSIS auditors reviewed a number of the periodic supervisory review reports generated by the RVOs. These reviews identified no concerns.

FSIS announced changes made under the August 21, 2014 final rule "*Modernization of Poultry Slaughter Inspection*" to all poultry-exporting countries. The FSIS auditors verified that IVSAH has provided training to inspection personnel and implemented the new regulatory requirements

consistent with 9 CFR §381.65. Accordingly, IVSAH requires the poultry slaughter establishments to develop, implement, and maintain written procedures to ensure that carcasses with visible fecal contamination do not enter the chiller and to prevent contamination of carcasses by enteric pathogens and fecal material throughout slaughter and dressing operations. This requirement included sampling and analysis for microbial organisms to monitor the efficacy of the establishment's process control. The FSIS auditors confirmed that the VICs and RVOs verified IVSAH's requirements at the establishment level and that each slaughter establishment had implemented the new requirements.

IVSAH requires the complete separation of establishments certified as eligible to export to the United States from those that are not certified by assigning different establishment numbers. The FSIS auditors verified that the processing establishments certified as eligible to export to the United States only receive their raw poultry source materials from Israel's eligible slaughter establishments and none of these processing establishments received any raw or processed poultry source materials from any other country. In addition, the eligible poultry slaughter establishments receive live poultry only from within Israel.

The FSIS auditors noted that each audited establishment maintained comprehensive recall procedures and maintained records sufficient to conduct traceback activities if adulterated product were exported to the United States. There has been no recalls involving product produce for export to the United States. The FSIS auditors also verified that IVSAH has the verification procedures in place to confirm the effectiveness of the establishments' recall procedures. The FSIS auditors verified that export certificates and stamps are under the control of the inspection personnel. IVSAH has controls in place to prevent the fraud or misuse of export health certificates.

Israel's poultry inspection system continues to maintain the legal authority and a regulatory framework, which as described, is consistent with criteria established for this component.

VI. COMPONENT THREE: GOVERNMENT SANITATION

The third of six equivalence components that the FSIS auditors reviewed was Government Sanitation. The FSIS auditors verified that the CCA requires each official establishment to develop, implement, and maintain written sanitation SOPs to prevent direct product contamination or insanitary conditions.

The FSIS auditors verified that IVSAH's sanitation requirements are consistent with FSIS regulatory requirements cited in 9 CFR Part 416. FSIS audited the CCA headquarters, two regional offices, and seven local inspection offices in order to assess IVSAH's ability to effectively communicate, verify, and enforce the sanitation requirements throughout the inspection system to prevent direct product contamination or the creation of insanitary conditions.

The FSIS auditors reviewed sanitation plans and records related to the design and implementation of sanitation programs at the audited establishments. The FSIS auditors assessed the adequacy of the pre-operational inspection verification by shadowing and observing the in-

plant inspection personnel conducting pre-operational sanitation verification inspection in the audited establishments. The in-plant inspection personnel's hands-on verification procedures started after the establishment had conducted its pre-operational sanitation and determined that the facility was ready for the in-plant inspector's pre-operational sanitation verification inspection. The in-plant inspection personnel conduct pre-operational sanitation verification on a daily basis in accordance with IVSAH's established procedures.

The FSIS auditors also observed the in-plant inspection personnel perform actual operational sanitation verification in all of the audited establishments. The FSIS auditors noted that the inspection verification activities included direct observation of the actual operations and review of the establishments' associated records. The FSIS auditors compared their overall observation of the sanitary conditions of the establishments with the in-plant inspection verification records. The FSIS auditors also examined the inspection personnel's documentation of sanitation noncompliance records and verified that the inspection personnel took regulatory enforcement control actions sufficient to ensure that sanitary conditions were restored and product was protected from contamination. The FSIS auditors' observations and record reviews, including the establishments' sanitation monitoring and corrective action records, as well as those of inspection personnel documenting inspection verification results or periodic supervisory reviews, found that inspection personnel were adequately verifying whether establishments met requirements.

The FSIS auditors noted that the inspection and establishment records for the most part mirrored the actual sanitary conditions of the establishments. The auditors noted that establishments maintained sanitation records sufficient to document the implementation and monitoring of sanitation and any corrective actions taken. The inspection personnel provided additional verification records addressing the establishment's proposed maintenance schedule and any applicable enforcement actions taken by the inspection personnel. The establishment employees responsible for the implementation and monitoring of the sanitation procedures correctly authenticated these records with initials or signatures and the date. The sanitation conditions in the audited establishments met the CCA's regulatory requirements and mirrored the FSIS auditor's observations on the day of the audit. The FSIS auditors did not identify any significant sanitation findings to report during the audit.

Israel's poultry inspection system continues to maintain sanitary regulatory requirements that meet the core requirements for this component. However, the FSIS auditors identified several isolated SPS observations that are noted in their respective individual establishment checklist provided in Appendix A of this report. There was no direct product contamination or adulteration of the product intended for export to the United States observed. During the exit meeting, IVSAH committed to address the sanitation observations.

VII. COMPONENT FOUR: GOVERNMENT HAZARD ANALYSIS AND CRITICAL CONTROL POINTS (HACCP) SYSTEM

The fourth of six equivalence components that the FSIS auditors reviewed was Government HACCP System. The inspection system is to require that each official establishment develop, implement, and maintain a HACCP system.

The FSIS auditors verified that IVSAH's HACCP requirements are consistent with FSIS regulatory requirements cited in 9 CFR Part 417. FSIS audited the CCA headquarters and two regional and seven local inspection offices in order to assess the CCA's ability to maintain adequate government oversight throughout the inspection system for the implementation of HACCP requirements.

The FSIS auditors reviewed the HACCP plans and records, observed the actual verification activities conducted by the inspection personnel, and reviewed the associated verification records generated by the inspection personnel. The FSIS auditors verified that the inspection personnel conduct verification of the establishments' HACCP plans during each shift in accordance with IVSAH's requirements. The inspection verification methodology includes such activities as the evaluation of the establishments' written HACCP programs and observing the establishment personnel perform monitoring, verification, corrective actions, and recordkeeping activities. The inspection verification activities also include direct observation or record review of CCPs with the results of the verifications entered in the associated inspection records.

The FSIS auditors verified through record review and observation at each establishment that IVSAH requires poultry slaughter establishments to develop, implement, and maintain a program for collecting and analyzing samples at pre-chill and post-chill for indicator organisms. The FSIS auditors verified that sampling procedures for pre-chill and post-chill sampling were addressed in the HACCP systems of all the audited poultry slaughter establishments. The FSIS auditors further verified that IVSAH requires that eligible poultry slaughter establishments implement and include in their HACCP plan written procedures to ensure that poultry carcasses contaminated with visible fecal material do not enter the carcass chiller. The FSIS auditors verified that IVSAH required and that establishments implemented procedures to ensure that poultry carcasses were being chilled immediately after slaughter operations.

The FSIS auditors conducted an onsite observation and document review of CCPs in all the audited establishments. The review of the audited establishment plans, CCPs, critical limits, monitoring procedures, verification procedures, and implemented corrective actions did not raise any significant concerns. In the poultry slaughter establishments, the FSIS auditors reviewed the zero tolerance (fecal material) CCP control records. In addition, the FSIS auditors, together with the in-plant inspection personnel, observed the establishments' employees conducting hands-on HACCP monitoring and verification activities for the zero tolerance CCP. Neither the FSIS auditors nor the inspection personnel observed any deviations from the critical limits. The FSIS auditors also reviewed the establishments' and the in-plant inspections' zero tolerance records. These reviews identified no concerns.

The FSIS auditors also verified that pre-chill and post-chill sampling for enteric pathogens was implemented in the HACCP systems of the poultry slaughter establishments, and that inspection personnel reviewed and verified the accuracy of the results of such programs. The FSIS auditors also verified that IVSAH requires each slaughter establishment to provide supporting documentation to demonstrate that poultry carcasses contain less than 8% retained water after the chilling process in accordance with IVSAH's requirements.

The FSIS auditors verified that IVSAH requires operators of establishments certified as eligible to export to the United States to develop, implement, and maintain HACCP programs. However, the FSIS auditors identified isolated HACCP record keeping observations that are noted in their respective individual establishment checklist provided in Appendix A of this report. There were no products affected by these observations. During the exit meeting, IVSAH committed to address the HACCP observations.

VIII. COMPONENT FIVE: GOVERNMENT CHEMICAL RESIDUE TESTING PROGRAMS

The fifth of six equivalence components that the FSIS auditors reviewed was Government Chemical Residue Testing Programs. The inspection system is to present a chemical residue testing program, organized and administered by the national government, which includes random sampling of internal organs, fat, and muscle of carcasses for chemical residues identified by the exporting country's poultry inspection authorities or by FSIS as potential contaminants.

Prior to the onsite visit, FSIS' residue experts thoroughly reviewed IVSAH's National Residue Program (NRP) for 2017 (and 2015-2016 results), associated methods of analysis, and additional SRT responses outlining the structure of Israel's chemical residue testing program.

FSIS audited the CCA headquarters, two regional offices, and one government chemical residue laboratory to verify the enforcement of IVSAH's regulatory requirements. Currently, Israel does not use private laboratories to conduct analyses for chemical residue samples. FSIS analysis and onsite audit verification of IVSAH's chemical residue testing program, as designed and implemented, show that IVSAH is effectively using its authority to ensure the production of safe product.

The NRP prohibits the marketing of poultry products containing biological residues above the Maximum Permitted Level (MPL). IVSAH conducts annual surveys to identify the potential sources of chemical residue contamination of poultry meat and its products. A central steering committee utilizes the information gathered in the survey to prepare the list of compounds to be included in the following year's NRP.

IVSAH's "Food Inspection Web Application" notifies the in-plant inspection personnel of chemical residue sampling requests including the matrices to be collected and the appropriate forms that must accompany the sample submission. IVSAH has direct access to the laboratory results through this application.

The FSIS auditors verified that the inspection personnel who collect the residue samples receive periodic training in accordance with IVSAH's NRP sampling protocol. This protocol includes sampling methodology, identification of animals, sampling location, sample size, sampling frequency, traceability, and secure delivery of residue samples to designated government residue laboratories.

The FSIS auditors visited the Kimron Veterinary Institute (KVI). KVI is the National Residue Control Laboratory that is ISO 17025 accredited by ISRAC. KVI is the government laboratory used for analysis of official samples taken from products destined for export to the United States. The KVI audit focused on sample handling, timely analysis, data reporting, analytical methodologies, tissue matrices, equipment operation and printouts, detection levels, percent recoveries, intra-laboratory check samples, and quality assurance programs, including standards books and corrective actions. The FSIS auditors reviewed the implementation of the current year's sampling plan at the headquarters, regional and in-plant inspection levels. These reviews identified no concerns.

The results of the onsite audit activities indicate that Israel continues to maintain the legal authority to regulate, plan, and execute activities of the inspection system that are aimed at preventing and controlling the presence of residues of veterinary drugs and contaminants in poultry products destined for export to the United States.

IX. COMPONENT SIX: GOVERNMENT MICROBIOLOGICAL TESTING PROGRAMS

The sixth of six components that the FSIS auditors reviewed was Government Microbiological Testing Programs. The system is to implement certain sampling and testing programs to ensure that poultry products produced for export to the United States are safe and wholesome.

IVSAH requires that eligible poultry slaughter establishments that produce raw materials for exporting from certified poultry processing establishments to develop, implement, and maintain a microbiological sampling and testing program to demonstrate process control in preventing contamination of carcasses by enteric pathogen and fecal material throughout the slaughter and dressing operations. In addition, the inspection personnel conduct verification sampling for *Salmonella* and *Campylobacter* in raw poultry products. PS 5.1.9 "*Salmonella and Campylobacter-Monitoring and Inspection in the Slaughterhouse*" establishes standards for the regulatory requirements pertaining to enforcing *Salmonella* and *Campylobacter* performance standards under HACCP/Pathogen Reduction requirements. IVSAH's sampling included the collection of one chicken rinse sample (set of 51 samples) and one turkey swab sample (set of 56 samples) daily until the sample set is completed.

The FSIS auditors observed the in-plant inspection personnel sample collection methodology for *Salmonella* and *Campylobacter* in two audited slaughter establishments. The FSIS auditors observed that the in-plant inspection personnel's sample collection methodology was in accordance with IVSAH's requirements that included aseptic sample collection, testing frequency, delivery of samples to government laboratories, and review of results. The FSIS auditors also verified that the inspection personnel were reviewing official testing results for trend analysis and verifying the establishments implement corrective measures when the establishment does not meet the performance standards.

IVSAH requires RTE processing establishments that produce post-lethality exposed product to control *Lm* by adopting one of the three alternatives. PSs 6.2.5 "*Lm in Ready-to-Eat Poultry Products*" and 6.2.6 "*Clarifications to Procedure Sheet About Lm in 'Ready-to-Eat'*

Poultry Products" outline the monitoring and control measures that must be implemented by an establishment producing RTE products. The requirements of PS 6.2.6 are consistent with FSIS' "*Compliance Guidelines to Control Lm in Post-Lethality Exposed Ready-to-Eat Meat and Poultry Products.*" In accordance with these procedures, an RTE product is considered to be adulterated when the product either comes in direct contact with equipment or food contact surface contaminated with *Lm*, *Listeria* spp., or any *Listeria*-like organism.

In addition, PS 2.3.1 "*Microbial Standards for the Export of Poultry Meat to the Countries of the European Union and the United States of America*" mandates zero tolerance of *Lm* and *Salmonella* in RTE product. This PS provides instruction to inspection personnel on how to verify that RTE products destined for export to the United States meet equivalence requirements. One of the requirements is that the inspection personnel must collect RTE product samples, 325 grams for *Salmonella* and 25 grams for *Lm*, prior to shipment of RTE product to the United States. IVSAH's prescribed verification sampling protocol mandates hold and test practices. If the RTE product tests positive for either *Lm* or *Salmonella*, it is not eligible for export to the United States.

In order to verify the effectiveness of an establishment's RTE control measures, IVSAH has implemented ongoing verification sampling of post-lethality exposed RTE products. The RVOs are responsible to conduct IVSAH's ongoing verification sampling program at each RTE poultry producing establishment. The official verification sampling consists of sampling RTE products, food contact surfaces, and non-food contact surfaces or the environment. The FSIS auditors noted that the RVOs' verification samples are analyzed at a government microbiology laboratory using the analytical methods listed in FSIS' *Microbiological Laboratory Guidebook* (MLG). When the results of the bacteriological examinations of RTE product find the presence of *Salmonella* or *Lm*, the RVOs conduct an evaluation of the implementation and enforcement of IVSAH's requirements in accordance with PS 5.2.3 "*Lm-Evaluation of Implementation and Enforcement of Veterinary Requirements by the RVO.*" Since the last FSIS audit in 2015, FSIS has reported one microbiological (*Lm*) POE violation, dated December 4, 2017, in imported poultry (Mexican Style Turkey Breast) products.

IVSAH also conducts species verification testing on a monthly basis. The VICs collect the required verification sampling in establishments certified as eligible to export to the United States. KVI is responsible for analyzing species verification samples in accordance with IVSAH's requirements. The FSIS auditors' review of this program and related records did not identify any concerns.

The FSIS auditors visited KVI and the Institute for Food Microbiology (IFM), a private microbiological laboratory. KVI conducts microbiological testing on the official verification samples and IFM conducts microbiological testing for establishments certified as eligible to export to the United States. IVSAH relies on the requirement that both laboratories are accredited by ISRAC for the standards specified in ISO 17025. During the laboratory visits, the FSIS auditors reviewed documents pertaining to the sample receipt, timely analysis, analytical methodologies, analytical controls, and reporting of results. The FSIS auditors verified that IVSAH is using FSIS' MLG for isolation and identification of

Salmonella (MLG 4.09), *Campylobacter* (MLG 41.04), and *Lm* (MLG 8.10). In addition, the FSIS auditors reviewed the laboratories' staff training records and the results of their proficiency testing. The FSIS auditors did not identify any significant non-conformity during the review of documents.

The audit found that IVSAH's poultry inspection system has a microbiological testing program that is organized and administered by the national government, and that IVSAH has implemented sampling and testing programs to verify its system. FSIS' analysis of IVSAH's control measures and its onsite audit verification activities found that Israel's microbiological testing program as designed and implemented meets the requirements for equivalence with the United States' system.

Israel's poultry inspection system continues to maintain a microbiological sampling and testing program that is consistent with criteria established for this component.

X. CONCLUSIONS AND NEXT STEPS

An exit meeting was held on January 24, 2018, in Beit Dagan, Israel, with IVSAH and FAS. At this meeting, FSIS auditors presented the preliminary findings and observations from the audit. An analysis of each equivalence component did not identify any deficiencies that represented an immediate threat to public health. The FSIS auditors identified the following findings:

Government Oversight (e.g., Organization and Administration)

- Israel uses in-plant inspection personnel hired and assigned by the EPB to perform all aspects of carcass inspection, including final carcass disposition during post-mortem inspection of the poultry product destined for export to the United States. This practice does not meet FSIS' requirements that a government inspector or contract employee under the supervision of a government inspector perform these inspection activities.
- There is a conflict of interest between some of the EPB's members and the EPB's hired in-plant inspection personnel who conduct inspection activities in the poultry slaughter establishments eligible to produce poultry products for export to the United States.

During the audit exit meeting, the Central Competent Authority (CCA) committed to address the preliminary findings and observations as presented. FSIS will evaluate the adequacy of the CCA's documentation of proposed corrective actions and base future equivalence verification activities on the information provided.

APPENDICES

Appendix A: Individual Foreign Establishment Audit Checklists

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Off-Tov (Shan) Hodu Tov (Shan) Ltd. Bet-Shean Valley	2. AUDIT DATE 01/18/2018	3. ESTABLISHMENT NO. 008	4. NAME OF COUNTRY Israel
	5. AUDIT STAFF OIEA International Audit Staff (IAS)		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	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.		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		56. European Community Directives	O
29. Records		57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

39/51

Small holes, rust, and exposed insulation over poultry carcass chiller.

40/51

Insufficient light at the post-mortem inspection station.

61. AUDIT STAFF

OIEA International Audit Staff (IAS)

62. DATE OF ESTABLISHMENT AUDIT

01/18/2018

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Kornish Chen (1987) Ltd..Off Hanegev P.O. Box 106 Ofaqim	2. AUDIT DATE 01/21/2018	3. ESTABLISHMENT NO. 20	4. NAME OF COUNTRY Israel
	5. AUDIT STAFF OIEA International Audit Staff (IAS)		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	X
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements		40. Light	
14. Developed and implemented a written HACCP plan .		41. Ventilation	X
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		56. European Community Directives	
29. Records		57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

19/51

The establishment HACCP plan did not include the frequency of verification activities.

39/51

Deteriorated seal around a shipping door did not provide a tight seal when door was closed (potential vermin entrance).

41/51

Beaded condensate on the ceiling and over exposed products on the production areas.

61. AUDIT STAFF

OIEA International Audit Staff (IAS)

62. DATE OF ESTABLISHMENT AUDIT

01/21/2018

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Tiv-Tirat-Zvi 2000, Meat Specialties M.P. Beit Shean Valley 10815 Kibbutz Tirat-tsvi	2. AUDIT DATE 01/21/2018	3. ESTABLISHMENT NO. 22	4. NAME OF COUNTRY Israel
	5. AUDIT STAFF OIEA International Audit Staff (IAS)		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

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

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

60. Observation of the Establishment

24/51

In the ingredient room the auditor identified a bag containing an unidentifiable dry product had no label.

46/51

Rejected product due to lack of vacuum was stored in edible container. Establishment do utilize color coded containers to store inedible or other meat waste.

61. AUDIT STAFF

OIEA International Audit Staff (IAS)

62. DATE OF ESTABLISHMENT AUDIT

01/21/2018

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Off Oz Marketing Ltd. Segev Shalom P.O. Box 865 Segev Shalom	2. AUDIT DATE 01/15/2018	3. ESTABLISHMENT NO. 35	4. NAME OF COUNTRY Israel
	5. AUDIT STAFF OIEA International Audit Staff (IAS)		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	X
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.	X	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		56. European Community Directives	O
29. Records		57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

22/51

The pre-shipment review records were not signed. The calibration records did not include times.

39/51

Several small holes in the ceiling were observed over exposed product in the production area.

46/51

During pre-operational sanitation inspection verification, residue buildups from the previous days' operation were observed on the surface of several cutting boards in the production area.

61. AUDIT STAFF

OIEA International Audit Staff (IAS)

62. DATE OF ESTABLISHMENT AUDIT

01/15/2018

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Maadancy Yehiam (1993) Ltd. Kibbutz Yehiam	2. AUDIT DATE 01/17/2018	3. ESTABLISHMENT NO. 104	4. NAME OF COUNTRY Israel
	5. AUDIT STAFF OIEA International Audit Staff (IAS)		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

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

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

60. Observation of the Establishment

There was no findings after consideration of extent and nature of all observations.

61. AUDIT STAFF

OIEA International Audit Staff (IAS)

62. DATE OF ESTABLISHMENT AUDIT

01/17/2018

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Off-Tov Products (2001) Ltd. M.P. Beit Shean Valley Beit Shean	2. AUDIT DATE 01/18/2018	3. ESTABLISHMENT NO. 108	4. NAME OF COUNTRY Israel
	5. AUDIT STAFF OIEA International Audit Staff (IAS)		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	X
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	X
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	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
Part D - Sampling Generic E. coli Testing		55. Post Mortem Inspection	O
27. Written Procedures	O	Part G - Other Regulatory Oversight Requirements	
28. Sample Collection/Analysis	O	56. European Community Directives	O
29. Records	O	57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions	O	59.	
31. Reassessment	O		
32. Written Assurance	O		

60. Observation of the Establishment

38/51

A storage cooler was packed with the product to the extent that it obstructed inspection or audit verification activity. Additionally, the auditor observed condensation had collected at the top edge of the entrance door of the cooler creating potential for product contamination during product movement into and out of the cooler.

41/51

During the pre-operational verification the auditor observed dripping condensate around a RTE conveyor belt exiting raw product storage to slicing room. Establishment management record for pre-operational clearance for this area did not identify any issues related to condensation or other sanitation problem. The VIC rejected the area.

45/51

Protective rubber sleeves covering some metal parts in two of the cooking ovens were disintegrating and eroding from the places creating source for product contamination from extraneous material released in the oven during cooking process.

46/51

Bags of spices and salts were stored on the walkway used for employees and forklifts traffic. Several bags were open spilling the contents on bags stored on lower shelves and on floor. Edges of broken plastic pellets were observed causing holes into the bags. The storage area was littered with dirt and debris and appeared to be damped all around.

61. AUDIT STAFF

OIEA International Audit Staff (IAS)

62. DATE OF ESTABLISHMENT AUDIT01/18/2018

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Thuva Galil Inc. P.O.B. 1010 South Industrial Zone Kiryat Shmona 11019	2. AUDIT DATE 01/17/2018	3. ESTABLISHMENT NO. 209	4. NAME OF COUNTRY Israel
	5. AUDIT STAFF OIEA International Audit Staff (IAS)		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	X
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements		40. Light	
14. Developed and implemented a written HACCP plan .		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		Part F - Inspection Requirements	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
Part C - Economic / Wholesomeness		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	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
Part D - Sampling Generic E. coli Testing		55. Post Mortem Inspection	O
27. Written Procedures	O	Part G - Other Regulatory Oversight Requirements	
28. Sample Collection/Analysis	O	56. European Community Directives	O
29. Records	O	57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions	O	59.	
31. Reassessment	O		
32. Written Assurance	O		

60. Observation of the Establishment

39/51

A plastic grid covering an exhaust assembly collected dirt and the greasy material on its surface. Additionally, beaded condensation were also observed at two places on the grid. The close proximity of the exhaust assembly to the conveyor belt carrying PLE products posed potential for contamination of the RTE poultry products and the conveyor belt.

61. AUDIT STAFF

OIEA International Audit Staff (IAS)

62. DATE OF ESTABLISHMENT AUDIT01/17/2018

Appendix B: Foreign Country Response to Draft Final Audit Report



STATE OF ISRAEL

Ministry of Agriculture and Rural Development
Veterinary Services and Animal Health, P.O.B 12, Beit –Dagan, 50250

May 21, 2018

Todd Furey,
Acting International Coordination Executive
Office of International Coordination
Food Safety and Inspection Service
1400 Independence Avenue, SW.
Washington D.C.
20250

IVSAH response to the non-compliances recorded by the FSIS auditors

Here are our comments on your concerns regarding the Egg and Poultry board (EPB) and the in-plant inspection personnel.

We believe that the current inspection system, as defined by the Israeli legislation, is formed in such a manner that there is no conflict of interest between the inspection personnel and the establishments eligible to produce poultry products for export to the United States.

As explained in different occasions in the past, and during the last FSIS' audit in Israel, and in contrast to what is written in the report's draft, only the Israeli Veterinary Services and Animal Health (IVSAH) of the Ministry of Agriculture and Rural Development has the authority to assign the inspection personnel to the different establishments. In addition, the inspection personnel cannot perform any aspect of carcass inspection without the accreditation of the IVSAH, which is the only entity who has the legal right to grant that accreditation to the inspection personnel.

The Regional Veterinary Officer (RVO), an IVSAH employee, assesses the in-plant inspection performance as part of every audit or inspection in the establishment and based on the RVO's recommendation the IVSAH can cancel the accreditation of each member of the inspection personnel. As mentioned above, without the IVSAH accreditation, the inspector is not allowed to perform any aspect of inspection and therefore the EPB has no other option but to fire him.

It is important to stress that the EPB has no authority to change, cancel or influence any professional matter regarding the inspection activities. The inspection personnel are performing strictly under the regulations and guidance of the IVSAH, a fact that was also mentioned in the FSIS' audit report.

Therefore, we maintain that the in-plant inspection personnel fall under the category of contract employees under the supervision of a government inspector as defined in Directive 3300.1. The acts that they perform do not affect a personal financial interest as defined in 18 U.S.C. § 208.



STATE OF ISRAEL

Ministry of Agriculture and Rural Development
Veterinary Services and Animal Health, P.O.B 12, Beit –Dagan, 50250

The current system is in place since the first time the USDA authorized the exportation of poultry products from Israel to the United States. The IVSAH are certain that there is no conflict of interest and that the in-plant veterinarians and inspectors are performing under the IVSAH instructions only.

Finally, we would like to inform you that based on the new Israeli legislation, the entire inspection framework will be changed very soon and a governmental body will employ all the veterinary inspection personnel both in the exporting establishments and in the domestic market establishments.

See the appendix for a detailed table of all the corrective actions taken by each individual establishment in order to address the non-compliances recorded by the FSIS auditors.

Sincerely,

Dr. Sergio Dolev
Director, Control of Animal Products Department
Israeli Veterinary Services and Animal Health
Ministry of Agriculture and Rural Development

cc:

Dr. Michel Bellaiche, CVO, IVSAH
Dr. Riva Ben-Ezra, Deputy Director, Control of Animal Products Department
Dr. Shlomo Garazi, Chief Import – Export Veterinary Officer
Mr. Oren Shaked, Senior Agricultural Specialist, Foreign Agricultural Service



STATE OF ISRAEL

Ministry of Agriculture and Rural Development
 Veterinary Services and Animal Health, P.O.B 12, Beit –Dagan, 50250

Appendix

In the next table are all the corrective and preventive actions taken by each individual establishment in order to address the non-compliances recorded by the FSIS auditors:

Establishment No.	Non compliance	Corrective action
020 – Kornish Chen (1987) Ltd. Off Hanegev	The establishment HACCP plan did not include the frequency of verification activities	The activities of verifications as were shown and are defined: daily direct observation or parallel check of another QC person (who is not the monitoring person) we added the following activities (which are executed but were not written in the specific document of HACCP plan): 1. yearly calibration of master thermometer in authorized external lab 2. daily verifications of thermometers against that master 3. We updated the procedure of verifying thermometers according Kansas university SOP calibration guide
	Deteriorated seal around a shipping door did not provide a tight seal when door was closed (potential vermin entrance).	A new door was replaced and sealed as required
	Beaded condensate on the ceiling and over exposed products on the production areas.	An infrastructure survey was conducted with a ventilation engineer. Problematic points were examined. At these points, powerful fans were added to remove the condensation.
035 - Off Oz Marketing Ltd.	The pre-shipment review records were not signed. The calibration records did not include times.	The Pre-Shipment records signed after filling. The calibration records include signature time
	Several small holes in the ceiling were observed over exposed product in the production area.	The holes in the ceiling have been sealed, and a maintenance manager will be instructed to carry out sealing immediately after dismantling existing construction and after maintenance work to maintain the integrity of the ceiling.



STATE OF ISRAEL

Ministry of Agriculture and Rural Development
 Veterinary Services and Animal Health, P.O.B 12, Beit –Dagan, 50250

	<p>During pre-operational sanitation inspection verification, residue buildups from the previous days' operation were observed on the surface of several cutting boards in the production area.</p>	<p>In the relevant department, the start of work has been suspended and all the work surfaces have been cleared from paint residues</p> <p>In addition, instruction was given to the Quality inspector worker about his responsible for performing the SSOP before starting work.</p>
<p>022 - Tiv-Tirat-Zvi 2000, Meat Specialties M.P. Beit Shean Valley 10815 Kibbutz Tirat-tsvi</p>	<p>In the ingredient room the auditor identified a bag containing an unidentifiable dry product had no label.</p>	<p>Bag was discarded.</p> <p>Training to relevant personal concerning identifying each bag with label</p>
	<p>Rejected product due to lack of vacuum was stored in edible container</p> <p>Establishment do utilize color-coded containers to store inedible or other meat waste.</p>	<p>Products were put in different color container and were marked with special label.</p> <p>Training of relevant personal concerning using specific color container with proper Label</p>
<p>209 - Tnuva Galil Inc. P.O.B. 1010 South Industrial Zone Kiryat Shmona 11019</p>	<p>plastic grid covering an exhaust assembly collected dirt and the greasy material on its surface. Additionally, beaded condensation were also observed at two places on the grid. The close proximity of the exhaust assembly to the conveyor belt carrying PLE products posed potential for contamination of the RTE poultry products and the conveyor belt.</p>	<p>1. Immediate steps were taken to eliminate the condensation, as defined in SSOP program .</p> <p>2. The mentioned grid and the exhaust assembly were cleaned the same day at the end of the shift. The opening of the exhaust assembly was moved several feet away to the East direction and the grid was replaced with metal removable shutters. Cleaning procedure 41-23 was updated following the changes</p> <p>SPS monitoring form was updated also</p>



STATE OF ISRAEL

Ministry of Agriculture and Rural Development
 Veterinary Services and Animal Health, P.O.B 12, Beit –Dagan, 50250

108 - Off-Tov Products (2001) Ltd. M.P. Beit Shean Valley Beit Shean	<p>A storage cooler was packed with the product to the extent that it obstructed inspection or audit verification activity. Additionally, the auditor observed condensation had collected at the top edge of the entrance door of the cooler creating potential for product contamination during product movement into and out of the cooler</p>	<p>The carts in the corners of the room were removed, so that it would be possible to enter the room and perform the SSOP inspection from all of its corners.</p> <p>Regarding the condensation – the area of the wires located above the doorpost, between the electrical capacitors, was immediately wiped.</p> <p>Regarding the condensation, the department managers and the SSOP monitors received training regarding meticulously pay attention to the monitoring of the condensations, the leakages and the drippings prior to the beginning of work and during it, while also emphasizing condensations in upper hidden places, such as electrical wires</p>
	<p>During the pre-operational verification the auditor observed dripping condensate around a RTE conveyor belt exiting raw product storage to slicing room. Establishment management record for pre-operational clearance for this area did not identify any issues related to condensation or other sanitation problem. The VIC rejected the area.</p>	<p>The work was discontinued and the conveyor belts were wiped dried and sanitized.</p> <ol style="list-style-type: none"> a. Further to the investigation of the incident, the condensation was caused by the discontinuation of the refrigeration process in the freezers. The Production Department was instructed not to turn off the freezers during work. In the case of a malfunction, all the products must be immediately removed before the ice in the freezer melts, while checking the condensations / drippings in the exit from the freezer b. The SSOP monitors and the personnel of the Production Department were trained to meticulously pay attention to this subject
	<p>Protective rubber sleeves covering some metal parts in two of the cooking ovens were disintegrating</p>	<p>The rubber protection caps were immediately replaced and the leakage was discontinued.</p> <p>The department managers, the SSOP monitors and the Sanitation Supervisor were trained to meticulously pay attention to the worn out and</p>



STATE OF ISRAEL

Ministry of Agriculture and Rural Development
 Veterinary Services and Animal Health, P.O.B 12, Beit –Dagan, 50250

	and eroding from the places creating source for product contamination from extraneous material released in the oven during cooking process.	disintegrating equipment while checking the infrastructures.
	Bags of spices and salts were stored on the walkway used for employees and forklifts traffic. Several bags were open spilling the contents on bags stored on lower shelves and on floor. Edges of broken plastic pellets were observed causing holes into the bags. The storage area was littered with dirt and debris and appeared to be damped all around.	Every storage area adjacent to the shelves was immediately cleaned. Broken surfaces made of plastic were immediately replaced. Wet sacks were immediately wiped and open sacks were immediately disqualified The shelves will be dismantled from the transit area . The Department Manager and the SSOP monitors were trained to meticulously pay attention to the monitoring in storage area prior to the start of work and during it, while emphasizing the findings
008 - Off-Tov (Shan) Hodu Tov (Shan) Ltd. Bet-Shean Valley	Small holes, rust, and exposed insulation over poultry carcass chiller.	All the findings were fixed. Purchased suitable equipment for high-altitude work and high-level cleaning brushes.
	Insufficient light at the post-mortem inspection station	Fixed all the points. Add lighting to the required places. All the critical points were monitored. Monitoring of the critical points will be done twice a year. Monitoring of lights will be done daily. Normal operation and cleaning of the lights