



United States  
Department of  
Agriculture

Food Safety  
and Inspection  
Service

Washington, D.C.  
20250

JUN 28 2005

Dr. William Anderson, Director  
Food of Animal Original Division  
Canadian Food Inspection Agency  
59 Camelot Drive  
Ottawa, Ontario  
K1A 0Y9

Dear Dr. Anderson:

The Food Safety and Inspection Service has completed Phase II of an enforcement audit of Canada's meat inspection system. The audit was conducted from February 8 through February 17, 2005. Comments from Canada have been included as an attachment to the final report. Enclosed is a copy of the final audit report.

If you have any questions regarding the audit or need additional information, please contact me by telephone at 202-720-3781, by fax at 202-690-4040, or by email at [sally.white@fsis.usda.gov](mailto:sally.white@fsis.usda.gov).

Sincerely,

A handwritten signature in cursive script that reads "Sally White JD".

Sally White  
Director  
International Equivalence Staff  
Office of International Affairs

Enclosure

**FINAL**

JUN 23 2005

**FINAL REPORT OF AN ENFORCEMENT AUDIT CARRIED OUT  
IN CANADA COVERING  
CANADA 'S MEAT INSPECTION SYSTEM**

**February 8 – February 17, 2005**

Food Safety and Inspection Service  
United States Department of Agriculture

## TABLE OF CONTENTS

1. INTRODUCTION
2. OBJECTIVES OF THE AUDIT
3. PROTOCOL
4. LEGAL BASIS FOR THE AUDIT
5. SUMMARY OF PREVIOUS AUDITS
6. MAIN FINDINGS
  - 6.1 Government Oversight
  - 6.2 Headquarters Audit
7. ESTABLISHMENT AUDITS
8. LABORATORY AUDITS
9. SANITATION CONTROLS
10. ANIMAL DISEASE CONTROLS
11. SLAUGHTER/PROCESSING CONTROLS
  - 8.1 Humane Handling and Slaughter
  - 8.2 Implementation of Requirements for Bovine Spongiform Encephalopathy
12. RESIDUE CONTROLS
13. ENFORCEMENT CONTROLS
  - 13.1 Inspection System Controls
14. CLOSING MEETING
15. ATTACHMENTS TO THE AUDIT REPORT

## ABBREVIATIONS AND SPECIAL TERMS USED IN THE REPORT

BSE	Bovine Spongiform Encephalopathy
CCA	Central Competent Authority [Canadian Food Inspection Agency]
CFIA	Canadian Food Inspection Agency
FSIS	Food Safety and Inspection Service
HACCP	Hazard Analysis and Critical Control Point Systems
SRM	Specified Risk Material

## 1. INTRODUCTION

The audit took place in Canada from February 8 through February 17, 2005.

An opening meeting was held on February 8, 2005, in Ottawa, Canada, with the Central Competent Authority (CCA). At this meeting, the lead auditor confirmed the objectives and scope of the audit and confirmed the itineraries of the auditors.

Each auditor was accompanied during the entire audit by representatives from the CCA, the Canadian Food Inspection Agency.

## 2. OBJECTIVES OF THE AUDIT

This audit was an enforcement audit. The objective of the audit was to evaluate CFIA implementation of FSIS interim rules for Bovine Spongiform Encephalopathy (BSE) in establishments slaughtering cattle over 30 months of age.

In pursuit of the objective, the following sites were visited: the headquarters offices of the CCA, two beef slaughter establishments, and three beef processing establishments.

Competent Authority Visits			Comments
Competent Authority	Central	1	
Beef Slaughter Establishments		2	
Beef Processing Establishments—Receive carcasses from the two slaughter establishments		3	

## 3. PROTOCOL

This on-site audit was conducted in two parts. One part involved visits with headquarters officials to evaluate Canada's implementation of FSIS' interim rules for Bovine Spongiform Encephalopathy (BSE) in cattle over thirty months of age. The second part involved on-site visits to two beef slaughter establishments and three beef processing establishments.

At the opening meeting, the lead auditor explained that the headquarters of the CCA and the establishments would be audited against one standard.

1. Instructions issued by CFIA on January 12, 2004 titled Interim BSE Measures—Export to the USA..

Each establishment was evaluated using a checklist titled *BSE Controls and the Handling of SRMs* in the beef slaughter and processing establishments.

#### 4. LEGAL BASIS FOR THE AUDIT

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

- The Federal Meat Inspection Act (21 U.S.C. 601 et seq.).
- The Federal Meat Inspection Regulations (9 CFR Parts 301 to end).

#### 5. SUMMARY OF PREVIOUS AUDITS

This was an enforcement audit. However, the scope of the audit was limited to a review of BSE measures in place in establishments slaughtering cattle that were over thirty months of age. There is no audit history for Canada regarding the implementation of BSE measures for cattle over thirty months.

#### 6. MAIN FINDINGS

##### 6.1 Government Oversight

The Canadian Food Inspection Agency is the CCA for Canada's meat inspection system and the CFIA has the ultimate control over the production of food products derived from animals. Canada is divided into four areas of administration and field operations. The Atlantic, Ontario, and Quebec Areas each have four Regional Offices. The Western Area has six Regional Offices.

New or revised official instructions and guidelines are issued by CFIA headquarters in Ottawa, Ontario. These instructions and guidelines are provided by electronic mail, facsimile, and hard copy to the Directors of each of the Area Offices. The Directors of the Area Offices then forward the instructions to the Regional Offices within their jurisdiction. Regional Veterinary Officers and Inspection Program Managers are then responsible for providing the new or revised information to the Inspector-in-Charge at each establishment.

The auditors found that instructions regarding the BSE interim rules had been immediately and effectively disseminated to Area Offices, Regional Offices, and the Inspector-in-Charge at each establishment.

##### 6.1.1 Ultimate Control and Supervision

CFIA has ultimate control and supervision of all establishments certified for export to the United States.

##### 6.1.2 Assignment of Competent, Qualified Inspectors

CFIA has assigned competent, qualified inspectors in establishments certified for export to the United States.

### 6.1.3 Authority and Responsibility to Enforce the Laws

CFIA has the authority and responsibility of enforcing applicable laws and regulations.

### 6.1.4 Adequate Administrative and Technical Support

CFIA has adequate administrative and technical support to carry out its responsibilities.

## 6.2 Headquarters Audit

The auditors conducted a review of inspection system documents at the headquarters of the CCA. The records review focused primarily on the following documents:

- Laws and implementation documents such as regulations, notices, directives and guidelines regarding BSE.
  - Instructions issued by CFIA on January 12, 2004, titled *Interim BSE Measures—Export to the USA*
- Supervisory visits to establishments that were certified to export to the United States.

No concerns arose as a result the examination of these documents at headquarters and at the other locations.

## 7. ESTABLISHMENT AUDITS

The FSIS auditors visited a total of five establishments. Two were beef slaughter establishments and three were beef processing establishments that received carcasses with spinal columns intact from the two slaughter establishments for further processing. No establishment was delisted by CFIA and no establishment received a Notice of Intent to Delist from CFIA.

## 8. SLAUGHTER/PROCESSING CONTROLS

The first risk area that the FSIS auditors reviewed for the enforcement audit was Slaughter/Processing Controls. The controls included the implementation of FSIS' interim rules for BSE. Controls on ante-mortem inspection procedures, ante-mortem disposition, humane handling and humane slaughter, post-mortem inspection procedures, and post-mortem disposition were also reviewed.

### 8.1 Humane Handling and Slaughter

No deficiencies were noted.

### 8.2 Implementation of BSE Requirements

Except as noted below, it was found that CFIA has effectively and correctly implemented FSIS' BSE requirements.

- In one slaughter establishment, there was no written correlation between the number of animals euthanized and sent for BSE testing and the number of animals received at Animal Health for testing.
- In one processing establishment, there was no written procedure for the knife trimming operation for removal of the spinal column including dorsal root ganglia.

The deficiency in the processing establishment had not been documented as a non-compliance by the Inspector-in-Charge.

## 9. SANITATION CONTROLS

These controls were not reviewed during this audit.

## 10. ANIMAL DISEASE CONTROLS

The second area that the FSIS auditors reviewed for the enforcement audit was Animal Disease Controls. The controls included the measures taken by CFIA to determine the age of cattle that are presented for slaughter. The age of each animal presented for slaughter is determined by CFIA inspection officials using dentition and/or documentation. No deficiencies were noted.

## 11. RESIDUE CONTROLS

These controls were not reviewed during this audit.

## 12. ENFORCEMENT CONTROLS

The third risk area that the FSIS auditors reviewed for the enforcement audit was Enforcement Controls. These controls included the enforcement of inspection requirements for BSE.

The following deficiencies were noted regarding BSE controls.

- In one slaughter establishment, there was no written correlation between the number of animals euthanized and sent for BSE testing and the number of animals received at Animal Health for testing.
- In one processing establishment, there was no written procedure for the knife trimming operation for removal of the spinal column including dorsal root ganglia.

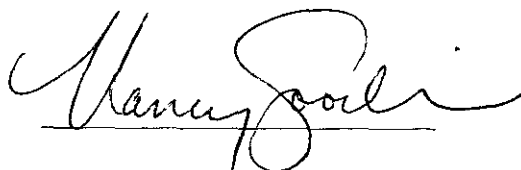


### 13. CLOSING MEETING

A closing meeting was held on February 17, 2005 in Ottawa, Canada, with the CCA. At this meeting, the preliminary audit findings were presented to *inspection officials*.

The CCA understood and accepted the findings.

Nancy Goodwin  
Lead Auditor

A handwritten signature in cursive script, reading "Nancy Goodwin", written over a horizontal line.

#### 14. ATTACHMENTS

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



Canadian Food Inspection Agency / Agence canadienne d'inspection des aliments

159 Cleopatra Drive  
Ottawa, Ontario

Tel: (613) 221-7099  
Fax: (613) 221-7296

FEB 22 2005

Mrs. Sally White  
Director  
International Equivalence Staff  
Office of International Affairs  
United States Department of Agriculture  
Food Safety and Inspection Service  
Washington, D.C. 20250

Dear Mrs White:

This is in response to the draft final audit report for the audit of the Canadian's meat inspection system conducted in February 2005.

I would like to confirm that a copy of establishments reports have been forwarded to each individual establishments for follow-up and that appropriate action was taken, where applicable.

I want to thank you for the opportunity to comment on the draft report.

Yours sincerely,

Dr. William R. Anderson  
Director  
Food of Animal Origin Division

c.c.: Catherine Airth, Director, Operations Coordination  
Kathy Scott

Canada

### BSE CONTROLS AND THE HANDLING OF SRMs

	ESTABLISHMENT NUMBER <u>    597    </u>	Yes (Y) or No (N) or Not Applicable (NA)
	<b>BACKGROUND INFORMATION</b>	
1	<p>Ask to see written inspection procedures and instructions from Area and Regional offices describing requirements for BSE controls and SRM handling (instructions since December 2003). <b>Ask to see HACCP plans, SSOP, or other pre-requisite programs regarding BSE and SRMs.</b></p> <p><b>OBSERVE, OBSERVE, OBSERVE</b> all steps, if at all possible.</p>	<p>Y</p> <p>Present in HACCP. pre-requisite programs, SOPs &amp; SSOPs.</p>
2	<p>Does the Veterinarian-In-Charge (VIC) know which tissues are SRMs? <i>[SRMs are: in all cattle, the tonsils and distal ileum and, in cattle 30 months of age and older, also the brain skull, eyes, trigeminal ganglia, spinal cord, vertebral column (excluding the vertebrae of the tail, transverse processes of thoracic &amp; lumbar vertebrae and the wings of the sacrum), and dorsal root ganglia.]</i></p> <p><b>Ask the VIC what SRMs are.</b></p>	<p>Y</p>
3	<p>Are traditional T-bone or porterhouse steaks or bone-in rib roasts exported to the U.S.?</p> <ul style="list-style-type: none"> <li>• If YES: are controls implemented to ensure that only cattle younger than 30 months of age are used for these products? <b>Ask to see control procedures and documentation.</b> <ul style="list-style-type: none"> <li>○ Do written procedures/documentation demonstrate only cattle &lt; 30 months are used for these products?</li> </ul> </li> </ul>	<p>N/A</p>
	<b>PROGRAM DESIGN</b>	
4	<p>Has the VIC verified that the establishment has re-assessed its hazard analysis to determine what steps, if any, are necessary to ensure that its products are free of SRMs?</p> <p><b>If YES, ask how the VIC verified the reassessment.</b></p> <ul style="list-style-type: none"> <li>• If NO: has the VIC determined the deficiency and issued a NOID? <b>Ask if this has happened and ask to see the NOID that was issued and the CAs that were taken.</b></li> </ul>	<p>Y</p> <p>Y- written format for verification of assessment.</p>

## BSE CONTROLS AND THE HANDLING OF SRMs

597  
P.2

5	<p>If reasonably likely to occur (RLTO), has the VIC verified that the establishment has designed controls &amp; incorporated them into the HACCP plan?</p> <p><b>Ask the VIC how this was verified.</b></p>	<p>Y</p> <p>Verified by HACCP plan &amp; CFIA verification.</p>
6	<p>If not RLTO because of procedures in a pre-requisite program, has the VIC verified that the procedures &amp; supporting documentation are available for review?</p> <p><b>Ask to see written procedures.</b></p>	<p>N/A</p>
7	<p>Has the establishment adopted procedures designed to ensure the complete &amp; proper removal of SRMs ?</p> <ul style="list-style-type: none"> <li>• Has the establishment incorporated these procedures into its HACCP plan, SSOP, or other prerequisite program? <b>Ask to see the procedures.</b></li> </ul>	<p>Y</p> <p>In all 3 types of programs.</p>
8	<p>Does the VIC take appropriate action when noncompliance is found regarding SRM controls (i.e. what action is taken when the VIC finds a noncompliance)? <i>[Issues an NR and verifies that the est. takes CA. If the procedures are under a prerequisite program, officials are to verify that the est. re-assesses its HACCP plan to determine whether the decisions made in the HA continue to support the use of the prerequisite program.]</i></p> <p><b>Has a noncompliance been found? If so, what actions were taken by the establishment and what actions were taken by CFIA. If a noncompliance has not yet occurred, ask what actions would be taken if it did.</b></p>	<p>Y</p> <p>Y, for incomplete spinal cord removal. CFIA issued card, est. invest. Vacuum system, inc. monitoring, all in written documentation</p>
9	<p>Does the est. routinely evaluate the effectiveness of their procedures for the removal, segregation, and disposition of SRMs?</p> <p><b>How often does an evaluation take place? What criteria are used to evaluate effectiveness?</b></p>	<p>Y</p> <p>Yearly for plans, weekly for records generated, on-site visit every 3 mos.</p>
10	<p>Does the est. maintain daily records sufficient to document the implementation and monitoring of the procedures for the removal, segregation, and disposition of SRMs?</p> <p><b>Ask to see daily records for past two weeks.</b></p>	<p>Y</p>

## BSE CONTROLS AND THE HANDLING OF SRMs

597  
P.3

ANTE-MORTEM / STUNNING		
11	<ul style="list-style-type: none"> <li>•• Are all animals with CNS symptoms condemned? <b>Ask the VIC what CNS symptoms he is looking for.</b> <i>[CNS symptoms include changes in temperament, such as nervousness or aggression, abnormal posture, lack of coordination and difficulty rising.]</i></li> <li>•• How does the VIC ensure condemnation of such animals?</li> <li>•• <b>Does the plant have documentation to show that animals with CNS symptoms are condemned? Ask to see such documentation.</b></li> </ul>	<p style="text-align: center;">Y</p> <hr/> <p>Tagged &amp; recorded, euthanized, shipped to Depot, AH picks up @ depot – no correl. Of #s</p> <hr/> <p>No CNS condemn since doing OTM, issue CFIA antemortem condemn card</p>
12	<p>Does the VIC ensure that non-ambulatory cattle are excluded from any possibility of being used for U.S.-eligible product?</p> <p><b>Ask to see instructions with regard to non-ambulatory cattle.</b></p>	<p>No downers allowed into slaughter, follow US/CFIA protocol chart</p>
13	<p>Has the VIC verified that captive bolt stunners which deliberately inject compressed air (air injection stunning) into the cranium at the end of the penetration cycle are not used to stun cattle?</p> <p><b>Observe stunning to ensure air injection stunning is not used in cattle.</b></p>	<p style="text-align: center;">Y</p> <p>Pneumatic gun, not air-injection</p>
14	<p>Has the establishment implemented procedures designed to identify the cattle to be slaughtered that are 30 months of age and older?</p> <p><b>Ask to see the procedures.</b> <i>[If the est. has determined, in its hazard analysis, that all cattle will be considered 30 months or older, it is not necessary for the est. to have evidence about the proof of the age of the cattle.]</i></p>	<p>All animals are 30 months of age or older.</p>
15	<p>Is appropriate documentation accepted by the VIC for cattle to be considered less than 30 months of age? <i>[Acceptable: birth certificate, cattle passport, or other positive ID presented with the animal when it arrives for slaughter.]</i></p> <p><b>Ask to view sample of accepted documentation.</b></p>	<p style="text-align: center;">N/A</p>

## BSE CONTROLS AND THE HANDLING OF SRMs

597  
p. 4

16	<p>Does the VIC take appropriate action if he/she questions the validity of the age documentation presented with an animal?</p> <p><b>Ask the VIC what action is taken if there is a question as to age. [Verify the animal's age through dental examination: If there is a 3<sup>rd</sup> erupting incisor, the top edge may not be above the gum line.]</b></p>	All animals are 30 months of age or older.
17	<p>If the establishment cannot ensure that the stunning does not result in brain leakage onto the head, are the heads from cattle 30 months of age or older being condemned?</p> <p><b>Ask how this situation is handled.</b></p>	All animals are 30 months of age or older.
<b>SLAUGHTER OPERATIONS</b>		
18	<p>If cattle younger than 30 months are not segregated from cattle that are 30 months or older, are all cattle treated as if they are 30 months or older?</p> <p><b>If relevant, ask to view documentation that all cattle are treated as if they are 30 months or older.</b></p>	N/A
19	<p>Observe post-mortem inspection for presence of SRMs on edible product. Do post-mortem inspectors take appropriate actions during carcass or head inspection when they observe SRMs on edible portions of the product? <i>[What actions are taken? The est. may recondition the head or carcass by knife trimming; if there is repeated noncompliance, the PM insp. is to notify the VIC.]</i></p> <p><b>Ask to see procedures that inspectors follow when this found.</b></p>	<p>Y</p> <p>Written procedures for inspection.</p>
20	<p>Has the establishment adopted procedures designed to ensure that all SRMs are segregated from edible product?</p> <p><b>Ask to see written procedures.</b></p>	Y
21	<p>Does the est. clean and sanitize the splitting saw after slaughtering cattle 30 months or older before using it on younger cattle?</p>	N/A
22	<p>If vertebral columns from cattle that are 30 months or older are not removed before the product leaves the slaughter est., are they adequately identified as such, and does the identification transfer with them until they are disposed of as inedible?</p> <p><b>Ask how they are identified. Ask how disposal of inedible product ensured.</b></p>	<p>Y</p> <p>Written procedures, dye marking of vertebral column.</p> <p>Shipped by est. sealed van to boning est., opened by receiving est., CFIA verifies #s</p>

## BSE CONTROLS AND THE HANDLING OF SRMs

597  
p.5

23	<p>Has the est. adopted procedures designed to ensure that all SRMs are properly disposed of in a manner that will prevent cross-contamination with edible product?</p> <p><b>Ask to see written procedures.</b></p>	<p>Y, all inedible goes as one to rendering operation. Pick up multiple times per day. Est. tracks trucks and weights.</p>
<b>FURTHER PROCESSING</b>		
24	<p>Has the est. adopted control procedures designed either:</p> <ol style="list-style-type: none"> <li>1. to NOT allow bone-in beef from cattle 30 months or older into the est., or</li> <li>2. to ensure that such product (e.g., vertebral columns for AMR) is handled in an appropriate manner (ensuring that SRMS are removed and discarded)?</li> </ol> <p>Has the est. implemented verification procedures to ensure that the control procedures are followed?</p> <p><b>Ask to see written procedures.</b></p>	<p>N/A</p> <hr/> <p>N/A</p>
25	<p>In a processing est., has management adequately addressed how it will segregate the skulls and prohibited sections of vertebral columns from cattle 30 months or older?</p> <p><b>Ask to see written procedures.</b></p>	<p>N/A</p>
26	<p>If product containing SRMs is shipped to other ests., does the shipping est. have documented procedures to ensure that the SRMs are removed in the receiving est.?</p> <p><b>If applicable, ask to see written procedures for shipping/receiving product containing SRMs.</b></p>	<p>NO</p> <p>Letter of guarantee from receiving est. that they are following SRM regs.</p>



**BSE CONTROLS AND THE HANDLING OF SRMs**

	ESTABLISHMENT NUMBER <u>    53    </u>	Yes (Y) or No (N) or Not Applicable (NA)
<b>BACKGROUND INFORMATION</b>		
1	<p>Ask to see written inspection procedures and instructions from Area and Regional offices describing requirements for BSE controls and SRM handling (instructions since December 2003). <b>Ask to see HACCP plans, SSOP, or other pre-requisite programs regarding BSE and SRMs.</b></p> <p><b>OBSERVE, OBSERVE, OBSERVE</b> all steps, if at all possible.</p>	<p>Y Most is in HACCP. Training is in a pre-requisite program. SSOP for dedicated knives.</p>
2	<p>Does the Veterinarian-In-Charge (VIC) know which tissues are SRMs? <i>[SRMs are: in all cattle, the tonsils and distal ileum and, in cattle 30 months of age and older, also the brain skull, eyes, trigeminal ganglia, spinal cord, vertebral column (excluding the vertebrae of the tail, transverse processes of thoracic &amp; lumbar vertebrae and the wings of the sacrum), and dorsal root ganglia.]</i></p> <p><b>Ask the VIC what SRMs are.</b></p>	<p>Y</p>
3	<p>Are traditional T-bone or porterhouse steaks or bone-in rib roasts exported to the U.S.?</p> <ul style="list-style-type: none"> <li>• If YES: are controls implemented to ensure that only cattle younger than 30 months of age are used for these products? <b>Ask to see control procedures and documentation.</b> <ul style="list-style-type: none"> <li>○ Do written procedures/documentation demonstrate only cattle &lt; 30 months are used for these products?</li> </ul> </li> </ul>	<p>N/A</p>
<b>PROGRAM DESIGN</b>		
4	<p>Has the VIC verified that the establishment has re-assessed its hazard analysis to determine what steps, if any, are necessary to ensure that its products are free of SRMs?</p> <p><b>If YES, ask how the VIC verified the reassessment.</b></p> <ul style="list-style-type: none"> <li>• If NO: has the VIC determined the deficiency and issued a NOID? <b>Ask if this has happened and ask to see the NOID that was issued and the CAs that were taken.</b></li> </ul>	<p>Y</p> <p>Y- written format for verification of assessment.</p>

## BSE CONTROLS AND THE HANDLING OF SRMs

**53**  
**P.2**

5	<p>If reasonably likely to occur (RLTO), has the VIC verified that the establishment has designed controls &amp; incorporated them into the HACCP plan?</p> <p><b>Ask the VIC how this was verified.</b></p>	Y
6	<p>If not RLTO because of procedures in a pre-requisite program, has the VIC verified that the procedures &amp; supporting documentation are available for review?</p> <p><b>Ask to see written procedures.</b></p>	N/A
7	<p>Has the establishment adopted procedures designed to ensure the complete &amp; proper removal of SRMs ?</p> <ul style="list-style-type: none"> <li>• Has the establishment incorporated these procedures into its HACCP plan, SSOP, or other prerequisite program? <b>Ask to see the procedures.</b></li> </ul>	Y
8	<p>Does the VIC take appropriate action when noncompliance is found regarding SRM controls (i.e. what action is taken when the VIC finds a noncompliance)? <i>[Issues an NR and verifies that the est. takes CA. If the procedures are under a prerequisite program, officials are to verify that the est. re-assesses its HACCP plan to determine whether the decisions made in the HA continue to support the use of the prerequisite program.]</i></p> <p><b>Has a noncompliance been found? If so, what actions were taken by the establishment and what actions were taken by CFIA. If a noncompliance has not yet occurred, ask what actions would be taken if it did.</b></p>	Y
9	<p>Does the est. routinely evaluate the effectiveness of their procedures for the removal, segregation, and disposition of SRMs?</p> <p><b>How often does an evaluation take place? What criteria are used to evaluate effectiveness?</b></p>	Y
10	<p>Does the est. maintain daily records sufficient to document the implementation and monitoring of the procedures for the removal, segregation, and disposition of SRMs?</p> <p><b>Ask to see daily records for past two weeks.</b></p>	Y

**BSE CONTROLS AND THE HANDLING OF SRMs**

53  
p.3

<b>ANTE-MORTEM / STUNNING</b>		
11	<ul style="list-style-type: none"> <li>• Are all animals with CNS symptoms condemned? <b>Ask the VIC what CNS symptoms he is looking for.</b> <i>[CNS symptoms include changes in temperament, such as nervousness or aggression, abnormal posture, lack of coordination and difficulty rising.]</i></li> <li>• How does the VIC ensure condemnation of such animals?</li> <li>• <b>Does the plant have documentation to show that animals with CNS symptoms are condemned? Ask to see such documentation.</b></li> </ul>	<p style="text-align: center;">Y</p> <hr/> <p>Call to Animal Health, euthanize animals at est., AH hauls away for BSE testing</p> <hr/> <p>CFIA records, not est. records, AH receipt records, both must agree</p>
12	<p>Does the VIC ensure that non-ambulatory cattle are excluded from any possibility of being used for U.S.-eligible product?</p> <p><b>Ask to see instructions with regard to non-ambulatory cattle.</b></p>	<p>All are euthanized before transport by AH, AH has own vehicles</p>
13	<p>Has the VIC verified that captive bolt stunners which deliberately inject compressed air (air injection stunning) into the cranium at the end of the penetration cycle are not used to stun cattle?</p> <p><b>Observe stunning to ensure air injection stunning is not used in cattle.</b></p>	Y
14	<p>Has the establishment implemented procedures designed to identify the cattle to be slaughtered that are 30 months of age and older?</p> <p><b>Ask to see the procedures.</b> <i>[If the est. has determined, in its hazard analysis, that all cattle will be considered 30 months or older, it is not necessary for the est. to have evidence about the proof of the age of the cattle.]</i></p>	<p>All animals are 30 months of age or older.</p>
15	<p>Is appropriate documentation accepted by the VIC for cattle to be considered less than 30 months of age? <i>[Acceptable: birth certificate, cattle passport, or other positive ID presented with the animal when it arrives for slaughter.]</i></p> <p><b>Ask to view sample of accepted documentation.</b></p>	N/A

## BSE CONTROLS AND THE HANDLING OF SRMs

53  
p. 4

16	<p>Does the VIC take appropriate action if he/she questions the validity of the age documentation presented with an animal?</p> <p><b>Ask the VIC what action is taken if there is a question as to age. [Verify the animal's age through dental examination: if there is a 3<sup>rd</sup> erupting incisor, the top edge may not be above the gum line.]</b></p>	All animals are 30 months of age or older.
17	<p>If the establishment cannot ensure that the stunning does not result in brain leakage onto the head, are the heads from cattle 30 months of age or older being condemned?</p> <p><b>Ask how this situation is handled.</b></p>	All animals are 30 months of age or older.
<b>SLAUGHTER OPERATIONS</b>		
18	<p>If cattle younger than 30 months are not segregated from cattle that are 30 months or older, are all cattle treated as if they are 30 months or older?</p> <p><b>If relevant, ask to view documentation that all cattle are treated as if they are 30 months or older.</b></p>	N/A
19	<p>Observe post-mortem inspection for presence of SRMs on edible product. Do post-mortem inspectors take appropriate actions during carcass or head inspection when they observe SRMs on edible portions of the product? <i>[What actions are taken? The est. may recondition the head or carcass by knife trimming; if there is repeated noncompliance, the PM insp. is to notify the VIC.]</i></p> <p><b>Ask to see procedures that inspectors follow when this found.</b></p>	<p>Y</p> <p>Written procedures for inspection.</p>
20	<p>Has the establishment adopted procedures designed to ensure that all SRMs are segregated from edible product?</p> <p><b>Ask to see written procedures.</b></p>	Y
21	<p>Does the est. clean and sanitize the splitting saw after slaughtering cattle 30 months or older before using it on younger cattle?</p>	N/A
22	<p>If vertebral columns from cattle that are 30 months or older are not removed before the product leaves the slaughter est., are they adequately identified as such, and does the identification transfer with them until they are disposed of as inedible?</p> <p><b>Ask how they are identified. Ask how disposal of inedible product ensured.</b></p>	<p>Y</p> <p>Written procedures, dye marking of vertebral column.</p> <p>Shipped by company sealed van to boning est.,</p>

## BSE CONTROLS AND THE HANDLING OF SRMs

**53**  
**P.5**

23	<p>Has the est. adopted procedures designed to ensure that all SRMs are properly disposed of in a manner that will prevent cross-contamination with edible product?</p> <p><b>Ask to see written procedures.</b></p>	<p>Y, all inedible goes as one to rendering operation. Pick up multiple times per day.</p>
<b>FURTHER PROCESSING</b>		
24	<p>Has the est. adopted control procedures designed either:</p> <ol style="list-style-type: none"> <li>1. to NOT allow bone-in beef from cattle 30 months or older into the est., or</li> <li>2. to ensure that such product (e.g., vertebral columns for AMR) is handled in an appropriate manner (ensuring that SRMS are removed and discarded)?</li> </ol> <p>Has the est. implemented verification procedures to ensure that the control procedures are followed?</p> <p><b>Ask to see written procedures.</b></p>	<p>N/A</p> <p>N/A</p>
25	<p>In a processing est., has management adequately addressed how it will segregate the skulls and prohibited sections of vertebral columns from cattle 30 months or older?</p> <p><b>Ask to see written procedures.</b></p>	<p>N/A</p>
26	<p>If product containing SRMs is shipped to other ests., does the shipping est. have documented procedures to ensure that the SRMs are removed in the receiving est.?</p> <p><b>If applicable, ask to see written procedures for shipping/receiving product containing SRMs.</b></p>	<p>CFIA employee in receiving est. does verification of SRM removal as well as est. verification. Receiving est. provides letter of guarantee of procedures.</p>

**BSE CONTROLS AND THE HANDLING OF SRMs**

	ESTABLISHMENT NUMBER <u>235A</u>	Yes (Y) or No (N) or Not Applicable (NA)
	<b>BACKGROUND INFORMATION</b>	
1	<p>Ask to see written inspection procedures and instructions from Area and Regional offices describing requirements for BSE controls and SRM handling (instructions since December 2003). <b>Ask to see HACCP plans, SSOP, or other pre-requisite programs regarding BSE and SRMs.</b></p> <p><b>OBSERVE, OBSERVE, OBSERVE</b> all steps, if at all possible.</p>	<p>Y</p> <p>HACCP. SOP</p>
2	<p>Does the Veterinarian-In-Charge (VIC) know which tissues are SRMs? [<i>SRMs are: in all cattle, the tonsils and distal ileum and, in cattle 30 months of age and older, also the brain skull, eyes, trigeminal ganglia, spinal cord, vertebral column (excluding the vertebrae of the tail, transverse processes of thoracic &amp; lumbar vertebrae and the wings of the sacrum), and dorsal root ganglia.</i>]</p> <p><b>Ask the VIC what SRMs are.</b></p>	<p>Y</p>
3	<p>Are traditional T-bone or porterhouse steaks or bone-in rib roasts exported to the U.S.?</p> <ul style="list-style-type: none"> <li>• If YES: are controls implemented to ensure that only cattle younger than 30 months of age are used for these products? <b>Ask to see control procedures and documentation.</b> <ul style="list-style-type: none"> <li>○ Do written procedures/documentation demonstrate only cattle &lt; 30 months are used for these products?</li> </ul> </li> </ul>	<p>N, est. is dedicated OTM.</p>
	<b>PROGRAM DESIGN</b>	
4	<p>Has the VIC verified that the establishment has re-assessed its hazard analysis to determine what steps, if any, are necessary to ensure that its products are free of SRMs?</p> <p><b>If YES, ask how the VIC verified the reassessment.</b></p> <ul style="list-style-type: none"> <li>• If NO: has the VIC determined the deficiency and issued a NOID? <b>Ask if this has happened and ask to see the NOID that was issued and the CAs that were taken.</b></li> </ul>	<p>Y</p> <p>Y- written format for verification of assessment. Also onsite verification and documentation review.</p>

**BSE CONTROLS AND THE HANDLING OF SRMs**

**235A**  
**P.2**

5	<p>If reasonably likely to occur (RLTO), has the VIC verified that the establishment has designed controls &amp; incorporated them into the HACCP plan?</p> <p><b>Ask the VIC how this was verified.</b></p>	<p>Y</p> <p>Checking plans which reflect this requirement.</p>
6	<p>If not RLTO because of procedures in a pre-requisite program, has the VIC verified that the procedures &amp; supporting documentation are available for review?</p> <p><b>Ask to see written procedures.</b></p>	<p>N/A</p>
7	<p>Has the establishment adopted procedures designed to ensure the complete &amp; proper removal of SRMs ?</p> <ul style="list-style-type: none"> <li>• Has the establishment incorporated these procedures into its HACCP plan, SSOP, or other prerequisite program? <b>Ask to see the procedures.</b></li> </ul>	<p>Y</p> <p>HACCP SOPs</p>
8	<p>Does the VIC take appropriate action when noncompliance is found regarding SRM controls (i.e. what action is taken when the VIC finds a noncompliance)? <i>[Issues an NR and verifies that the est. takes CA. If the procedures are under a prerequisite program, officials are to verify that the est. re-assesses its HACCP plan to determine whether the decisions made in the HA continue to support the use of the prerequisite program.]</i></p> <p><b>Has a noncompliance been found? If so, what actions were taken by the establishment and what actions were taken by CFIA. If a noncompliance has not yet occurred, ask what actions would be taken if it did.</b></p>	<p>Y</p> <p>Just once at receiving early in implementation of procedures. Actions were appropriate.</p>
9	<p>Does the est. routinely evaluate the effectiveness of their procedures for the removal, segregation, and disposition of SRMs?</p> <p><b>How often does an evaluation take place? What criteria are used to evaluate effectiveness?</b></p>	<p>Y</p> <p>1x/yr or if internal changes or regulatory requirements change</p>
10	<p>Does the est. maintain daily records sufficient to document the implementation and monitoring of the procedures for the removal, segregation, and disposition of SRMs?</p> <p><b>Ask to see daily records for past two weeks.</b></p>	<p>Y</p>

ANTE-MORTEM / STUNNING		
11	<ul style="list-style-type: none"> <li>Are all animals with CNS symptoms condemned? <b>Ask the VIC what CNS symptoms he is looking for.</b> [CNS symptoms include changes in temperament, such as nervousness or aggression, abnormal posture, lack of coordination and difficulty rising.]</li> </ul>	N/A
	<ul style="list-style-type: none"> <li>How does the VIC ensure condemnation of such animals?</li> </ul>	N/A
	<ul style="list-style-type: none"> <li><b>Does the plant have documentation to show that animals with CNS symptoms are condemned? Ask to see such documentation.</b></li> </ul>	N/A
12	<p>Does the VIC ensure that non-ambulatory cattle are excluded from any possibility of being used for U.S.-eligible product?</p> <p><b>Ask to see instructions with regard to non-ambulatory cattle.</b></p>	N/A
13	<p>Has the VIC verified that captive bolt stunners which deliberately inject compressed air (air injection stunning) into the cranium at the end of the penetration cycle are not used to stun cattle?</p> <p><b>Observe stunning to ensure air injection stunning is not used in cattle.</b></p>	N/A
14	<p>Has the establishment implemented procedures designed to identify the cattle to be slaughtered that are 30 months of age and older?</p> <p><b>Ask to see the procedures.</b> [If the est. has determined, in its hazard analysis, that all cattle will be considered 30 months or older, it is not necessary for the est. to have evidence about the proof of the age of the cattle.]</p>	N/A
15	<p>Is appropriate documentation accepted by the VIC for cattle to be considered less than 30 months of age? [Acceptable: birth certificate, cattle passport, or other positive ID presented with the animal when it arrives for slaughter.]</p> <p><b>Ask to view sample of accepted documentation.</b></p>	N/A



**BSE CONTROLS AND THE HANDLING OF SRMs**

**235A**  
**p. 4**

16	Does the VIC take appropriate action if he/she questions the validity of the age documentation presented with an animal?  <b>Ask the VIC what action is taken if there is a question as to age. [Verify the animal's age through dental examination: If there is a 3<sup>rd</sup> erupting incisor, the top edge may not be above the gum line.]</b>	N/A
17	If the establishment cannot ensure that the stunning does not result in brain leakage onto the head, are the heads from cattle 30 months of age or older being condemned?  <b>Ask how this situation is handled.</b>	N/A
<b>SLAUGHTER OPERATIONS</b>		
18	If cattle younger than 30 months are not segregated from cattle that are 30 months or older, are all cattle treated as if they are 30 months or older?  <b>If relevant, ask to view documentation that all cattle are treated as if they are 30 months or older.</b>	N/A
19	Observe post-mortem inspection for presence of SRMs on edible product. Do post-mortem inspectors take appropriate actions during carcass or head inspection when they observe SRMs on edible portions of the product? <i>[What actions are taken? The est. may recondition the head or carcass by knife trimming; if there is repeated noncompliance, the PM insp. is to notify the VIC.]</i>  <b>Ask to see procedures that inspectors follow when this found.</b>	N/A
20	Has the establishment adopted procedures designed to ensure that all SRMs are segregated from edible product?  <b>Ask to see written procedures.</b>	N/A
21	Does the est. clean and sanitize the splitting saw after slaughtering cattle 30 months or older before using it on younger cattle?	N/A
22	If vertebral columns from cattle that are 30 months or older are not removed before the product leaves the slaughter est., are they adequately identified as such, and does the identification transfer with them until they are disposed of as inedible?  <b>Ask how they are identified. Ask how disposal of inedible product ensured.</b>	Receiving est. verifies application of blue dye on received cattle, both OTM & UTM received as incidentals from UTM slaughter facilities.

**BSE CONTROLS AND THE HANDLING OF SRMs**

**235A**  
**p.5**

23	<p>Has the est. adopted procedures designed to ensure that all SRMs are properly disposed of in a manner that will prevent cross-contamination with edible product?</p> <p><b>Ask to see written procedures.</b></p>	N/A
<b>FURTHER PROCESSING</b>		
24	<p>Has the est. adopted control procedures designed either:</p> <ol style="list-style-type: none"> <li>1. to NOT allow bone-in beef from cattle 30 months or older into the est., or</li> <li>2. to ensure that such product (e.g., vertebral columns for AMR) is handled in an appropriate manner (ensuring that SRMS are removed and discarded)?</li> </ol> <p>Has the est. implemented verification procedures to ensure that the control procedures are followed?</p> <p><b>Ask to see written procedures.</b></p>	<p>Y, all received meat is OTM. All inedible goes as one to rendering operation. Pick up multiple times per day.</p> <p>Y</p>
25	<p>In a processing est., has management adequately addressed how it will segregate the skulls and prohibited sections of vertebral columns from cattle 30 months or older?</p> <p><b>Ask to see written procedures.</b></p>	Y, see above.
26	<p>If product containing SRMs is shipped to other ests., does the shipping est. have documented procedures to ensure that the SRMs are removed in the receiving est.?</p> <p><b>If applicable, ask to see written procedures for shipping/receiving product containing SRMs.</b></p>	<p>No product shipped out with SRM material.</p> <p>All SRM material shipped as inedible to rendering facility.</p>

**BSE CONTROLS AND THE HANDLING OF SRMs**

	ESTABLISHMENT NUMBER <u>    366    </u>	Yes (Y) or No (N) or Not Applicable (NA)
<b>BACKGROUND INFORMATION</b>		
1	<p>Ask to see written inspection procedures and instructions from Area and Regional offices describing requirements for BSE controls and SRM handling (<i>instructions since December 2003</i>). <b>Ask to see HACCP plans, SSOP, or other pre-requisite programs regarding BSE and SRMs.</b></p> <p><b>OBSERVE, OBSERVE, OBSERVE</b> all steps, if at all possible.</p>	<p>Y</p> <p>HACCP. Pre-requisite programs</p>
2	<p>Does the Veterinarian-In-Charge (VIC) know which tissues are SRMs? [<i>SRMs are: in all cattle, the tonsils and distal ileum and, in cattle 30 months of age and older, also the brain skull, eyes, trigeminal ganglia, spinal cord, vertebral column (excluding the vertebrae of the tail, transverse processes of thoracic &amp; lumbar vertebrae and the wings of the sacrum), and dorsal root ganglia.</i>]</p> <p><b>Ask the VIC what SRMs are.</b></p>	<p>Y</p>
3	<p>Are traditional T-bone or porterhouse steaks or bone-in rib roasts exported to the U.S.?</p> <ul style="list-style-type: none"> <li>• If YES: are controls implemented to ensure that only cattle younger than 30 months of age are used for these products? <b>Ask to see control procedures and documentation.</b> <ul style="list-style-type: none"> <li>○ Do written procedures/documentation demonstrate only cattle &lt; 30 months are used for these products?</li> </ul> </li> </ul>	<p>N, est. is dedicated OTM.</p>
<b>PROGRAM DESIGN</b>		
4	<p>Has the VIC verified that the establishment has re-assessed its hazard analysis to determine what steps, if any, are necessary to ensure that its products are free of SRMs?</p> <p><b>If YES, ask how the VIC verified the reassessment.</b></p> <ul style="list-style-type: none"> <li>• If NO: has the VIC determined the deficiency and issued a NOID? <b>Ask if this has happened and ask to see the NOID that was issued and the CAs that were taken.</b></li> </ul>	<p>Y</p> <p>Y- written format for verification of assessment. Also onsite verification and documentation review.</p>

## BSE CONTROLS AND THE HANDLING OF SRMs

366  
p.2

5	<p>If reasonably likely to occur (RLTO), has the VIC verified that the establishment has designed controls &amp; incorporated them into the HACCP plan?</p> <p><b>Ask the VIC how this was verified.</b></p>	<p>Y</p> <p>Reviewing plans which reflect this requirement.</p>
6	<p>If not RLTO because of procedures in a pre-requisite program, has the VIC verified that the procedures &amp; supporting documentation are available for review?</p> <p><b>Ask to see written procedures.</b></p>	<p>N/A</p>
7	<p>Has the establishment adopted procedures designed to ensure the complete &amp; proper removal of SRMs ?</p> <ul style="list-style-type: none"> <li>• Has the establishment incorporated these procedures into its HACCP plan, SSOP, or other prerequisite program? <b>Ask to see the procedures.</b></li> </ul>	<p>Y</p> <p>HACCP, SOPs</p> <p>* There is no written procedure for the knife boning which is not to contact spinal column.</p>
8	<p>Does the VIC take appropriate action when noncompliance is found regarding SRM controls (i.e. what action is taken when the VIC finds a noncompliance)? <i>[Issues an NR and verifies that the est. takes CA. If the procedures are under a prerequisite program, officials are to verify that the est. re-assesses its HACCP plan to determine whether the decisions made in the HA continue to support the use of the prerequisite program.]</i></p> <p><b>Has a noncompliance been found? If so, what actions were taken by the establishment and what actions were taken by CFIA. If a noncompliance has not yet occurred, ask what actions would be taken if it did.</b></p>	<p>Y</p> <p>N, action plans from both CFIA and est. in place. Plans include product disposition, back checks to clear lots, prrev. Action, etc.</p>
9	<p>Does the est. routinely evaluate the effectiveness of their procedures for the removal, segregation, and disposition of SRMs?</p> <p><b>How often does an evaluation take place? What criteria are used to evaluate effectiveness?</b></p>	<p>Y</p> <p>1x/yr or if internal changes or regulatory requirements change, criteria also include records generated</p>
10	<p>Does the est. maintain daily records sufficient to document the implementation and monitoring of the procedures for the removal, segregation, and disposition of SRMs?</p> <p><b>Ask to see daily records for past two weeks.</b></p>	<p>Y</p>

**BSE CONTROLS AND THE HANDLING OF SRMs**

366  
p.3

<b>ANTE-MORTEM / STUNNING</b>		
11	<ul style="list-style-type: none"> <li>Are all animals with CNS symptoms condemned? <b>Ask the VIC what CNS symptoms he is looking for.</b> <i>[CNS symptoms include changes in temperament, such as nervousness or aggression, abnormal posture, lack of coordination and difficulty rising.]</i></li> </ul>	N/A
	<ul style="list-style-type: none"> <li>How does the VIC ensure condemnation of such animals?</li> </ul>	N/A
	<ul style="list-style-type: none"> <li><b>Does the plant have documentation to show that animals with CNS symptoms are condemned? Ask to see such documentation.</b></li> </ul>	N/A
12	<p>Does the VIC ensure that non-ambulatory cattle are excluded from any possibility of being used for U.S.-eligible product?</p> <p><b>Ask to see instructions with regard to non-ambulatory cattle.</b></p>	N/A
13	<p>Has the VIC verified that captive bolt stunners which deliberately inject compressed air (air injection stunning) into the cranium at the end of the penetration cycle are not used to stun cattle?</p> <p><b>Observe stunning to ensure air injection stunning is not used in cattle.</b></p>	N/A
14	<p>Has the establishment implemented procedures designed to identify the cattle to be slaughtered that are 30 months of age and older?</p> <p><b>Ask to see the procedures.</b> <i>[If the est. has determined, in its hazard analysis, that all cattle will be considered 30 months or older, it is not necessary for the est. to have evidence about the proof of the age of the cattle.]</i></p>	N/A
15	<p>Is appropriate documentation accepted by the VIC for cattle to be considered less than 30 months of age? <i>[Acceptable: birth certificate, cattle passport, or other positive ID presented with the animal when it arrives for slaughter.]</i></p> <p><b>Ask to view sample of accepted documentation.</b></p>	N/A

## BSE CONTROLS AND THE HANDLING OF SRMs

366  
p.4

16	<p>Does the VIC take appropriate action if he/she questions the validity of the age documentation presented with an animal?</p> <p><b>Ask the VIC what action is taken if there is a question as to age. [Verify the animal's age through dental examination: If there is a 3<sup>rd</sup> erupting incisor, the top edge may not be above the gum line.]</b></p>	N/A
17	<p>If the establishment cannot ensure that the stunning does not result in brain leakage onto the head, are the heads from cattle 30 months of age or older being condemned?</p> <p><b>Ask how this situation is handled.</b></p>	N/A
<b>SLAUGHTER OPERATIONS</b>		
18	<p>If cattle younger than 30 months are not segregated from cattle that are 30 months or older, are all cattle treated as if they are 30 months or older?</p> <p><b>If relevant, ask to view documentation that all cattle are treated as if they are 30 months or older.</b></p>	N/A
19	<p>Observe post-mortem inspection for presence of SRMs on edible product. Do post-mortem inspectors take appropriate actions during carcass or head inspection when they observe SRMs on edible portions of the product? <i>[What actions are taken? The est. may recondition the head or carcass by knife trimming; if there is repeated noncompliance, the PM insp. is to notify the VIC.]</i></p> <p><b>Ask to see procedures that inspectors follow when this found.</b></p>	N/A
20	<p>Has the establishment adopted procedures designed to ensure that all SRMs are segregated from edible product?</p> <p><b>Ask to see written procedures.</b></p>	N/A
21	<p>Does the est. clean and sanitize the splitting saw after slaughtering cattle 30 months or older before using it on younger cattle?</p>	N/A
22	<p>If vertebral columns from cattle that are 30 months or older are not removed before the product leaves the slaughter est., are they adequately identified as such, and does the identification transfer with them until they are disposed of as inedible?</p> <p><b>Ask how they are identified. Ask how disposal of inedible product ensured.</b></p>	Y Receiving est. verifies application of blue dye on received cattle,

**BSE CONTROLS AND THE HANDLING OF SRMs**

**366  
P.5**

23	<p>Has the est. adopted procedures designed to ensure that all SRMs are properly disposed of in a manner that will prevent cross-contamination with edible product?</p> <p><b>Ask to see written procedures.</b></p>	N/A
<b>FURTHER PROCESSING</b>		
24	<p>Has the est. adopted control procedures designed either:</p> <ol style="list-style-type: none"> <li>1. to NOT allow bone-in beef from cattle 30 months or older into the est., or</li> <li>2. to ensure that such product (e.g., vertebral columns for AMR) is handled in an appropriate manner (ensuring that SRMS are removed and discarded)?</li> </ol> <p>Has the est. implemented verification procedures to ensure that the control procedures are followed?</p> <p><b>Ask to see written procedures.</b></p>	<p>Y, all received meat is OTM. All inedible goes as one to rendering operation. All bone is crushed and compacted into receiving container. No denaturing is done as this is NOT an open container. Pick up multiple times per day.</p>
		Y
25	<p>In a processing est., has management adequately addressed how it will segregate the skulls and prohibited sections of vertebral columns from cattle 30 months or older?</p> <p><b>Ask to see written procedures.</b></p>	Y, see above.
26	<p>If product containing SRMs is shipped to other ests., does the shipping est. have documented procedures to ensure that the SRMs are removed in the receiving est.?</p> <p><b>If applicable, ask to see written procedures for shipping/receiving product containing SRMs.</b></p>	<p>No product shipped out with SRM material.</p> <p>All SRM material shipped as inedible to rendering facility.</p>

### BSE CONTROLS AND THE HANDLING OF SRMs

	ESTABLISHMENT NUMBER _____ 496 _____	Yes (Y) or No (N) or Not Applicable (NA)
	<b>BACKGROUND INFORMATION</b>	
1	<p>Ask to see written inspection procedures and instructions from Area and Regional offices describing requirements for BSE controls and SRM handling (instructions since December 2003). <b>Ask to see HACCP plans, SSOP, or other pre-requisite programs regarding BSE and SRMs.</b></p> <p><b>OBSERVE, OBSERVE, OBSERVE</b> all steps, if at all possible.</p>	<p>Y Most guidance is electronic HACCP. SOP, but same requirements for deviation response as US does for SSOP.</p>
2	<p>Does the Veterinarian-In-Charge (VIC) know which tissues are SRMs? [<i>SRMs are: in all cattle, the tonsils and distal ileum and, in cattle 30 months of age and older, also the brain skull, eyes, trigeminal ganglia, spinal cord, vertebral column (excluding the vertebrae of the tail, transverse processes of thoracic &amp; lumbar vertebrae and the wings of the sacrum), and dorsal root ganglia.</i>]</p> <p><b>Ask the VIC what SRMs are.</b></p>	<p>Y Est. has designated cuts 1" outside of spinal column as protective of DRGs.</p>
3	<p>Are traditional T-bone or porterhouse steaks or bone-in rib roasts exported to the U.S.?</p> <ul style="list-style-type: none"> <li>• If YES: are controls implemented to ensure that only cattle younger than 30 months of age are used for these products? <b>Ask to see control procedures and documentation.</b> <ul style="list-style-type: none"> <li>○ Do written procedures/documentation demonstrate only cattle &lt; 30 months are used for these products?</li> </ul> </li> </ul>	<p>N, est. is dedicated OTM.</p>
	<b>PROGRAM DESIGN</b>	
4	<p>Has the VIC verified that the establishment has re-assessed its hazard analysis to determine what steps, if any, are necessary to ensure that its products are free of SRMs?</p> <p><b>If YES, ask how the VIC verified the reassessment.</b></p> <ul style="list-style-type: none"> <li>• If NO: has the VIC determined the deficiency and issued a NOID? <b>Ask if this has happened and ask to see the NOID that was issued and the CAs that were taken.</b></li> </ul>	<p>Y Y- written format for verification of assessment.</p>



**BSE CONTROLS AND THE HANDLING OF SRMs**

**496**  
**p.2**

5	<p>If reasonably likely to occur (RLTO), has the VIC verified that the establishment has designed controls &amp; incorporated them into the HACCP plan?</p> <p><b>Ask the VIC how this was verified.</b></p>	<p>Y</p> <p>Checking plans which reflect this requirement.</p>
6	<p>If not RLTO because of procedures in a pre-requisite program, has the VIC verified that the procedures &amp; supporting documentation are available for review?</p> <p><b>Ask to see written procedures.</b></p>	<p>N/A</p>
7	<p>Has the establishment adopted procedures designed to ensure the complete &amp; proper removal of SRMs ?</p> <ul style="list-style-type: none"> <li>• Has the establishment incorporated these procedures into its HACCP plan, SSOP, or other prerequisite program? <b>Ask to see the procedures.</b></li> </ul>	<p>Y</p> <p>HACCP SOPs</p>
8	<p>Does the VIC take appropriate action when noncompliance is found regarding SRM controls (i.e. what action is taken when the VIC finds a noncompliance)? <i>[Issues an NR and verifies that the est. takes CA. If the procedures are under a prerequisite program, officials are to verify that the est. re-assesses its HACCP plan to determine whether the decisions made in the HA continue to support the use of the prerequisite program.]</i></p> <p><b>Has a noncompliance been found? If so, what actions were taken by the establishment and what actions were taken by CFIA. If a noncompliance has not yet occurred, ask what actions would be taken if it did.</b></p>	<p>There is a plan, well understood by both est. &amp; inspection but no occurrence of noncompliance..</p> <p>N, see above</p>
9	<p>Does the est. routinely evaluate the effectiveness of their procedures for the removal, segregation, and disposition of SRMs?</p> <p><b>How often does an evaluation take place? What criteria are used to evaluate effectiveness?</b></p>	<p>Y (not yet operating 1 yr.)</p> <p>1x/yr or if internal changes or regulatory requirements change</p>
10	<p>Does the est. maintain daily records sufficient to document the implementation and monitoring of the procedures for the removal, segregation, and disposition of SRMs?</p> <p><b>Ask to see daily records for past two weeks.</b></p>	<p>Y</p>

**BSE CONTROLS AND THE HANDLING OF SRMs**

496  
P.3

ANTE-MORTEM / STUNNING		
11	<ul style="list-style-type: none"> <li>Are all animals with CNS symptoms condemned? <b>Ask the VIC what CNS symptoms he is looking for.</b> [CNS symptoms include changes in temperament, such as nervousness or aggression, abnormal posture, lack of coordination and difficulty rising.]</li> </ul>	N/A
	<ul style="list-style-type: none"> <li>How does the VIC ensure condemnation of such animals?</li> </ul>	N/A
	<ul style="list-style-type: none"> <li><b>Does the plant have documentation to show that animals with CNS symptoms are condemned? Ask to see such documentation.</b></li> </ul>	N/A
12	<p>Does the VIC ensure that non-ambulatory cattle are excluded from any possibility of being used for U.S.-eligible product?</p> <p><b>Ask to see instructions with regard to non-ambulatory cattle.</b></p>	N/A
13	<p>Has the VIC verified that captive bolt stunners which deliberately inject compressed air (air injection stunning) into the cranium at the end of the penetration cycle are not used to stun cattle?</p> <p><b>Observe stunning to ensure air injection stunning is not used in cattle.</b></p>	N/A
14	<p>Has the establishment implemented procedures designed to identify the cattle to be slaughtered that are 30 months of age and older?</p> <p><b>Ask to see the procedures.</b> [If the est. has determined, in its hazard analysis, that all cattle will be considered 30 months or older, it is not necessary for the est. to have evidence about the proof of the age of the cattle.]</p>	N/A
15	<p>Is appropriate documentation accepted by the VIC for cattle to be considered less than 30 months of age? [Acceptable: birth certificate, cattle passport, or other positive ID presented with the animal when it arrives for slaughter.]</p> <p><b>Ask to view sample of accepted documentation.</b></p>	N/A

## BSE CONTROLS AND THE HANDLING OF SRMs

496  
p.4

16	<p>Does the VIC take appropriate action if he/she questions the validity of the age documentation presented with an animal?</p> <p><b>Ask the VIC what action is taken if there is a question as to age. [Verify the animal's age through dental examination: If there is a 3<sup>rd</sup> erupting incisor, the top edge may not be above the gum line.]</b></p>	N/A
17	<p>If the establishment cannot ensure that the stunning does not result in brain leakage onto the head, are the heads from cattle 30 months of age or older being condemned?</p> <p><b>Ask how this situation is handled.</b></p>	N/A
<b>SLAUGHTER OPERATIONS</b>		
18	<p>If cattle younger than 30 months are not segregated from cattle that are 30 months or older, are all cattle treated as if they are 30 months or older?</p> <p><b>If relevant, ask to view documentation that all cattle are treated as if they are 30 months or older.</b></p>	N/A
19	<p>Observe post-mortem inspection for presence of SRMs on edible product. Do post-mortem inspectors take appropriate actions during carcass or head inspection when they observe SRMs on edible portions of the product? <i>[What actions are taken? The est. may recondition the head or carcass by knife trimming; if there is repeated noncompliance, the PM insp. is to notify the VIC.]</i></p> <p><b>Ask to see procedures that inspectors follow when this found.</b></p>	N/A
20	<p>Has the establishment adopted procedures designed to ensure that all SRMs are segregated from edible product?</p> <p><b>Ask to see written procedures.</b></p>	N/A
21	<p>Does the est. clean and sanitize the splitting saw after slaughtering cattle 30 months or older before using it on younger cattle?</p>	N/A
22	<p>If vertebral columns from cattle that are 30 months or older are not removed before the product leaves the slaughter est., are they adequately identified as such, and does the identification transfer with them until they are disposed of as inedible?</p> <p><b>Ask how they are identified. Ask how disposal of inedible product ensured.</b></p>	Receiving est. verifies seals and carcass lists. Verifies application of blue dye on received cattle.

**BSE CONTROLS AND THE HANDLING OF SRMs**

496  
p.5

23	<p>Has the est. adopted procedures designed to ensure that all SRMs are properly disposed of in a manner that will prevent cross-contamination with edible product?</p> <p><b>Ask to see written procedures.</b></p>	N/A
<b>FURTHER PROCESSING</b>		
24	<p>Has the est. adopted control procedures designed either:</p> <ol style="list-style-type: none"> <li>1. to NOT allow bone-in beef from cattle 30 months or older into the est., or</li> <li>2. to ensure that such product (e.g., vertebral columns for AMR) is handled in an appropriate manner (ensuring that SRMs are removed and discarded)?</li> </ol> <p>Has the est. implemented verification procedures to ensure that the control procedures are followed?</p> <p><b>Ask to see written procedures.</b></p>	<p>Y, all received meat is OTM. All inedible goes as one to rendering operation. Pick up multiple times per day.</p> <p>Y</p>
25	<p>In a processing est., has management adequately addressed how it will segregate the skulls and prohibited sections of vertebral columns from cattle 30 months or older?</p> <p><b>Ask to see written procedures.</b></p>	Y, see above.
26	<p>If product containing SRMs is shipped to other ests., does the shipping est. have documented procedures to ensure that the SRMs are removed in the receiving est.?</p> <p><b>If applicable, ask to see written procedures for shipping/receiving product containing SRMs.</b></p>	<p>No product shipped out with SRM material.</p> <p>All SRM material shipped as inedible to rendering facility.</p>