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

NOV 15 2006

Nick Coulson
Head, International Animal Health Division
Department for Environment Food & Rural Affairs (DEFRA)
Room 403c
1A Page Street
London
SW1P 4PQ

Dear Dr. Coulson:

The Food Safety and Inspection Service conducted an on-site audit of Great Britain's meat inspection system March 10 through March 22, 2006. Comments from Great Britain have been included as an attachment to the final report. Enclosed is a copy of the final report.

If you have any questions, please contact me at (202) 720-3781. You may also contact me by fax at (202) 690-4040 or by electronic mail at (sally.white@fsis.usda.gov).

Sincerely,

Sally White
Director
International Equivalence Staff
Office of International Affairs

FINAL

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

MARCH 10 THROUGH MARCH 22, 2006

Food Safety and Inspection Service
United States Department of Agriculture

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ABBREVIATIONS AND SPECIAL TERMS USED IN THE REPORT

CCA	Central Competent Authority [Department for Environment, Food and Rural Affairs]
DEFRA	Department for Environment, Food and Rural Affairs
EC	European Commission
E. coli	*Escherichia coli*
FSIS	Food Safety and Inspection Service
FSA	Food Standards Agency
Listeria	*Listeria monocytogenes*
MHS	Meat Hygiene Service
OV	Official Veterinarian
PR/HACCP	Pathogen Reduction/Hazard Analysis and Critical Control Point Systems
RVA	Regional Veterinary Adviser
Salmonella	*Salmonella* species
SSOP	Sanitation Standard Operating Procedures
VEA	European Community/United States Veterinary Equivalence Agreement
VMD	Veterinary Medicines Directorate
VMHA	Veterinary Meat Hygiene Adviser
VPHOD	Veterinary Public Health Operations Division (of the FSA)

1. INTRODUCTION

The audit took place in Great Britain from March 10 to March 22, 2006.

An opening meeting was held on March 10, 2006, in London with the Central Competent Authority (CCA). At this meeting, the auditor confirmed the objective and scope of the audit, the audit itinerary, and requested additional information needed to complete the audit of Great Britain's meat inspection system.

During the major portion of the audit the auditor was accompanied by a representative from the CCA, the Food Standards Agency (FSA) as well as the Department for Environment, Food and Rural Affairs (DEFRA), which included representatives from the local and district inspection offices. A representative from the Veterinary Medicines Directorate was present during the audit of the Laboratory of the Government Chemist.

2. OBJECTIVE OF THE AUDIT

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

In pursuit of the objective, the following sites were visited: headquarters, one regional inspection office, two laboratories performing analytical testing on United States destined product, one swine slaughter/processing establishment, and one cold storage facility.

Competent Authority Visits	Headquarters	1	DEFRA office in London
	Region	1	MHS regional office in York
	Local	2	Establishment Level
Laboratories		2	
Swine slaughter/processing establishment		1	
Cold Storage Facility		1	

3. PROTOCOL

This on-site audit was conducted in four parts. One part involved visits with CCA officials to discuss oversight programs and practices, including enforcement activities. The second part involved an audit of a selection of records in the country's inspection headquarters or regional offices. The third part involved on-site visits to two establishments: one slaughter/processing establishment and one cold storage facility. The fourth part involved visits to two private laboratories. Bodycote Material Testing was conducting analyses of field samples for the presence of *Salmonella* species on carcasses, *Enterobacteriaceae* / Total Viable Count testing, as well as species verification testing. The Laboratory of the Government Chemist was conducting analyses of field samples for Great Britain's national residue control program.

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

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

At the opening meeting, the auditor explained to the CCA that their inspection system would be audited in accordance with three areas of focus. First, under provisions of the European Community/United States Veterinary Equivalence Agreement (VEA), the FSIS auditor would audit the meat inspection system against European Commission Directive 64/433/EEC of June 1964; European Commission Directive 96/22/EC of April 1996; and European Commission Directive 96/23/EC of April 1996. These directives have been declared equivalent by FSIS under the VEA.

Second, in areas not covered by these directives, the auditor would audit against FSIS requirements. FSIS requirements include daily inspection in all certified establishments, humane handling and slaughter of animals, the handling and disposal of inedible and condemned materials, species verification testing, and requirements for HACCP, SSOP, testing for generic *E. coli*[1] and *Salmonella*.

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

- Currently, Great Britain has an equivalence determination from FSIS regarding their *Salmonella* testing program. These differences can be reviewed under Section 13.2 of this report.
- FSIS has now determined the use of *Enterobacteriaceae* and Total Viable Count in lieu of generic *E. coli* is acceptable for all EU exporting countries.

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.).

[1] FSIS has now determined the use of *Enterobacteriaceae* and Total Viable Count in lieu of generic *E. coli* is acceptable for all EU exporting countries.

- The Federal Meat Inspection Regulations (9 CFR Parts 301 to end), which include the Pathogen Reduction/HACCP regulations.

In addition, compliance with the following European Community Directives was also assessed:

- Council Directive 64/433/EEC of June 1964 entitled Health Problems Affecting Intra-Community Trade in Fresh Meat
- Council Directive 96/23/EC of 29 April 1996 entitled Measures to Monitor Certain Substances and Residues Thereof in Live Animals and Animal Products
- Council Directive 96/22/EC of 29 April 1996 entitled Prohibition on the Use in Stockfarming of Certain Substances Having a Hormonal or Thyrostatic Action and of B-agonists

5. SUMMARY OF PREVIOUS AUDITS

Final audit reports are available on FSIS' website at the following address:
http://www.fsis.usda.gov/Regulations_&_Policies/Foreign_Audit_Reports/index.asp

The following deficiencies were identified during the FSIS audit of Great Britain's meat inspection system conducted in April 2004:

- In one establishment, the receptacles (plastic bins) used for storing edible products were not conspicuously and distinctively identified. Some of these receptacles were being used for discarded packaging materials in the processing, cut-up and boning rooms.
- In one establishment, the Meat Hygiene Service (MHS) inspectors were not palpating swine lungs and livers and were not incising and observing mandibular lymph nodes properly.
- Salmonella testing on carcasses was being performed with a modified method which had not received equivalence status.

The following deficiencies were identified during the FSIS audit of Great Britain's meat inspection system conducted in May 2005:

- In one establishment, rust was observed on the overhead structures of the cutting room and the carcass coolers.
- At one establishment, employees who regularly work with product and product-packaging materials were identified wearing their work uniforms in the establishment's restrooms and returning to work without changing these garments.
- In one establishment, dust and cobwebs were identified in the annex which was used for dry storage, and the walls of this area were in need of repair.
- In one establishment, some lockers needed repair because they were dented or rusty.
- In one establishment, laundered uniforms were seen touching the floor, because the hanging racks were too short.

- In one establishment, gaps were identified around the loading dock, which were large enough to allow the entry of pests and other rodents from the outside.
- The contract between the residue lab audited and the Veterinary Medical Services stipulated a turnaround time of 28 days or less for 90% of the lab results. However, only 80% of the results were meeting this timeframe.

6. MAIN FINDINGS

6.1 Government Oversight

6.1.1 CCA Control Systems

The CCA, the Department for the Environment, Food and Rural Affairs (DEFRA), is responsible for trade with countries outside the EU (including the U.S.). DEFRA carries out all communications with FSIS and will communicate official instructions to establishments certified to export to the United States. The International Animal Health Division of DEFRA has a working agreement with the Veterinary Public Health Operations Division (VPHOD) of the Food Standards Agency (FSA). FSA carries out the practical inspections and make recommendations for approval or delisting to DEFRA, and ensures the correct application of FSIS requirements in the certified establishments. This function is performed by the Veterinary Meat Hygiene Advisors (VMHA) from the VPHOD of the FSA. There are eight VMHA in England, each one covering a specified area of the country. The Working Agreement with DEFRA states that the implementation of FSIS requirements is the responsibility of the VMHA and therefore all communication between DEFRA International Animal Health Division and the VPHOD of the FSA is directed to the VMHA. The Meat Hygiene Service (MHS), an executive agency of FSA, provides government veterinarians and inspectors for "approved" meat and poultry establishments (domestic and exporting) by either direct hiring or through contract services. All officials veterinarians assigned to the two establishments currently certified to export to the United States are on contract to MHS. The Veterinarian contracts are reviewed annually and renewed every three years by FSA. The FSA has the authority to cancel the contracts with veterinarians at any time if it is deemed necessary. The Chief Executive of the MHS reports to the FSA Director of Enforcement and it is agreed that instructions for the establishment's Official Veterinarian (OV) and Regional Veterinary Advisor (RVA), in relation to FSIS requirements, will come directly from the VMHA. The official veterinarians and inspectors report directly to the RVAs, which are stationed throughout Great Britain.

Effective January 1, 2006, EU regulations no longer require a veterinary presence in cold storage facilities to enforce food hygiene controls. In a reflection of this change the FSA, who oversees matters relating to food hygiene, removed the responsibility for routine controls from the MHS, and passed them to the Local Authorities, which in turn exercise their food safety responsibilities through Environmental Health Officers who are specifically trained as food safety specialists.

However, DEFRA remains the central competent authority in Great Britain for matters relating to trade, and for this purpose they retain a veterinary presence in those cold

storage facilities which export to other countries in order to ensure that the requirements of the importing country are met.

6.1.2 Ultimate Control and Supervision

DEFRA, as the CCA, has the authority to remove establishments from the list of establishments certified to export to the U.S., and refuse the issuance of veterinary health certificates to prohibit exports from taking place. The decision as to whether the establishment is failing to meet U.S. requirements and the recommendation that delisting should occur is the responsibility of the VMHA, who would reach his/her decision after considering reports from the OV and the RVA and carrying out an audit of the establishment.

6.1.3 Assignment of Competent, Qualified Inspectors

All veterinarians and meat inspectors working in Great Britain's establishments must be fully qualified in accordance with legislative and instructional requirements. The MHS hires only those veterinarians designated as Official Veterinarians by the FSA for work in slaughter facilities. Before being employed by the MHS, both veterinarians and meat inspectors must undergo extensive theoretical and practical training and subsequent examination.

- During the audit it was determined that, within the last 12 months, no additional formal training specifically addressing FSIS requirements had been provided to the local inspection offices under review. However, other training related to food safety was provided as part of the continuous professional development (CPD) program.

6.1.4 Authority and Responsibility to Enforce the Laws

DEFRA, as the CCA, can remove establishments certified to export to the United States if FSIS requirements are not met. Monitoring of these requirements is carried out by VMHA and RVA from the MHS under the requisite schedule of visits (annually by the VMHA and monthly by the RVA when exports are taking place). Additional visits are carried out as necessary when there are adverse reports from the plant OV. De-listing would be carried out by DEFRA International Animal Health Division on a recommendation from the VMHA.

MHS has the authority and responsibility to enforce the applicable laws relevant to U.S. certified establishments. The Regional Veterinary Advisors (RVAs) are in charge of verifying and evaluating the implementation of the official directives, guidelines and instructions.

- However, deficiencies involving the enforcement of U.S. requirements were identified at one of the two establishments visited.

Those Official Veterinarians present at cold storage facilities certified for export to the United States maintain the legislative authority to inspect, detain and seize product as the

situation warrants. In addition, they may enforce the import requirements of any third country administratively through the withdrawal of certification to export.

6.1.5 Adequate Administrative and Technical Support

During the audit, the auditor found that the CCA has administrative and technical support to operate Great Britain's inspection system and has the resources and ability to support a third-party audit.

6.2 Headquarters Audit

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

- Internal review reports.
- Supervisory visits to establishments that were certified to export to the U.S.
- Training records for inspectors and laboratory personnel.
- New laws and implementation documents such as regulations, notices, directives and guidelines.
- Sampling and laboratory analyses for residues and microbiology.
- Sanitation, slaughter and processing inspection procedures and standards.
- Control of inedible and condemned materials.
- Export product inspection and control including export certificates.
- Enforcement records, including examples of control of noncompliant product, and withholding, suspending, withdrawing inspection services from or delisting an establishment that is certified to export product to the United States.

No concerns arose as a result the examination of these documents.

6.2.1 Audit of Regional and Local Inspection Sites

Regional Offices

The FSIS auditor reviewed one regional Meat Hygiene Service (MHS) office in York. The purpose of the assessment was to review the meat inspection records and determine the level of government oversight and control provided by the regional offices relative to the certified establishments.

The auditor concluded that:

- All relevant regulations, notices, and other inspection documents and records were adequately disseminated from headquarters through the regional offices to the two certified establishments (local inspection sites). This was accomplished by both hard copy and e-mails.
- Copies of all relevant regulations, notices, and other inspection documents and records were maintained at the regional offices.

- POV supervisor was knowledgeable of U.S. import requirements relative to the two certified establishments producing or exporting meat to the United States.
- The regional official demonstrated adequate administrative assistance to ensure that official inspection personnel were assigned to the two certified establishments.
- Records for training programs for inspectors in PR/HACCP and SSOP system implementation, *E. coli*[1], and *Salmonella* testing were reviewed.

The auditor found that the instructions had been received and implemented by the regional office visited.

Local Inspection Sites (Certified Establishments)

The auditor reviewed Great Britain's meat inspection records maintained at the local inspection sites certified to produce or export meat to the United States. In addition, the auditor interviewed the official veterinarians (OVs) at each establishment and their inspection teams, when applicable.

The auditor concluded that:

- All relevant regulations, notices, and other inspection documents and records were adequately disseminated from headquarters through the regional offices to the two local inspection sites. This was accomplished by both hard copy and e-mails.
- Inspection personnel demonstrated adequate knowledge of inspection requirements relative to the export and distribution of meat to the United States.

7. ESTABLISHMENT AUDITS

The FSIS auditor visited a total of two establishments. One was a slaughter/processing establishment and one was a cold storage facility. No establishments were delisted or received a Notice of Intent to Delist (NOID) by DEFRA.

Specific deficiencies are noted on the attached individual establishment reports.

8. RESIDUE AND MICROBIOLOGY LABORATORY AUDITS

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

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

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

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

The following laboratories were reviewed:

- The Laboratory of the Government Chemist is a private laboratory, located in Middlesex, which conducts analyses of field samples for Great Britain's national residue control program.
- Bodycote Material Testing, a private laboratory which conducts analyses of field samples for the presence of Salmonella species on carcasses, Enterobacteriaceae / Total Viable Count testing, as well as species verification testing.

No deficiencies were identified at the laboratory conducting microbiological testing. The findings at the Laboratory of the Government Chemist will be discussed in Section 12 (Residue Controls).

9. SANITATION CONTROLS

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

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

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

No deficiencies were identified concerning these elements at the two establishments audited.

9.1 SSOP

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOP were met, according to the criteria employed in the United States' domestic inspection program. In that the cold storage facility audited was not routinely involved with exposed product, a written SSOP program was not required at this establishment. No SSOP deficiencies were identified at the slaughter/processing establishment which was visited.

9.2 EC Directive 64/433

In both establishments, the provisions of EC Directive 64/433 were effectively implemented.

10. ANIMAL DISEASE CONTROLS

The second of the five risk areas that the FSIS auditor reviewed was Animal Disease Controls. These controls include ensuring adequate animal identification, control over condemned and restricted product, and procedures for sanitary handling of returned and reconditioned product. The auditor determined that Great Britain's inspection system had adequate controls in place. No deficiencies were noted.

There had been no outbreaks of animal diseases with public health significance since the last FSIS audit. The United States Animal and Plant Health Inspection Service (APHIS) declared Great Britain free of Rinderpest and Foot and Mouth Disease (FMD) effective December 17, 2002, although subject to special export conditions. APHIS also declared Great Britain free of Swine Vesicular Disease

Great Britain is currently under an APHIS restriction for Bovine Spongiform Encephalopathy (BSE), which prevents the export of ruminant products to the United States.

11. SLAUGHTER/PROCESSING CONTROLS

The third of the five risk areas that the FSIS auditor reviewed was Slaughter/Processing Controls. The controls include the following areas: ante-mortem inspection procedures, ante-mortem disposition, humane handling and humane slaughter, post-mortem inspection procedures, post-mortem disposition, ingredients identification, control of restricted ingredients, formulations, processing schedules, equipment and records, and processing controls of cured, dried, and cooked products.

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

11.1 Humane Handling and Humane Slaughter

No deficiencies were noted.

11.2 HACCP Implementation

With the possible exception of cold storage facilities, all establishments approved to export meat products to the United States are required to have developed and adequately implemented a HACCP program. These programs are evaluated according to the criteria employed in the United States' domestic inspection program.

During this audit, review of the HACCP program was practicable only during the on-site review of the slaughter/processing establishment, in that current FSIS policy exempts the

visited cold storage facility from meeting these requirements. The following deficiency was identified at the one establishment which was required to meet the FSIS HACCP regulations:

- The critical limit (CL) associated with the CCP for carcass chilling was incomplete, as it addressed only surface temperature (7° C) without a reference to time. Review of the establishment's hazard analysis indicated that this CCP was necessary to control the growth of microbial pathogens. Pathogen growth cannot be adequately controlled without appropriate reduction of the temperature of the carcass and the establishment of maximum times for achieving the required temperature. No further scientific documentation was provided by the establishment to support the omission of the time parameter from this CL.

11.3 Testing for Generic *E. coli*

One of the two establishments audited was required to meet the basic FSIS regulatory requirements for testing for generic *E. coli*. However, FSIS has now determined the use of *Enterobacteriaceae* and Total Viable Count in lieu of generic *E. coli* is acceptable for all EU exporting countries. No deficiencies were identified concerning the execution of this now equivalent testing protocol at this establishment.

11.4 Testing for *Listeria monocytogenes*

Neither of the establishments audited were producing ready-to-eat products for export to the United States and were not required to meet the FSIS requirements for *Listeria monocytogenes* testing. Great Britain is only exporting raw pork to the United States.

11.5 EC Directive 64/433

In both of the establishments audited, the provisions of EC Directive 64/433 were effectively implemented.

12. RESIDUE CONTROLS

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

Great Britain's National Residue Control Program for 2006 was being followed and was on schedule. However, the following deficiency was identified concerning the turnaround time for lab results:

- The contract between the residue lab audited and the Veterinary Medical Services stipulated a turnaround time of 28 days or less for 90% of the lab results. However, only 83% of the results from June 2005 to the time of the audit were meeting this timeframe. This is a similar finding to last year's audit.

12.1 FSIS Requirements

Great Britain inspection officials had adequate controls in place to ensure compliance with sampling and reporting procedures and storage and use of chemicals. The methods used for the analyses were acceptable.

12.2 EC Directive 96/22

In the Laboratory of the Government Chemist, the provisions of EC Directive 96/22 were effectively implemented.

12.3 EC Directive 96/23

In the Laboratory of the Government Chemist, the provisions of EC Directive 96/23 were effectively implemented.

13. ENFORCEMENT CONTROLS

The fifth of the five risk areas that the FSIS auditor reviewed was Enforcement Controls. These controls include the enforcement of inspection requirements and the testing program for *Salmonella*.

In one of two establishments, the FSIS regulatory requirements were not adequately enforced by the CCA, as identified by the following:

- The critical limit (CL) associated with the CCP for carcass chilling was incomplete, as it addressed only surface temperature (7° C) without a reference to time. Review of the establishment's hazard analysis indicated that this CCP was necessary to control the growth of microbial pathogens. Pathogen growth cannot be adequately controlled without appropriate reduction of the temperature of the carcass and the establishment of maximum times for achieving the required temperature. No further scientific documentation was provided by the establishment to support the omission of the time parameter from this CL.

13.1 Daily Inspection in Establishments

Inspection was being conducted daily in all slaughter and processing establishments.

13.2 Testing for *Salmonella*

Great Britain has adopted the FSIS requirements for the testing of carcasses for *Salmonella* with the exception of the following equivalent measure(s).

- The establishment is authorized to take samples.
- A private laboratory analyzes the samples.
- The laboratory method utilized is based on BS EN ISO 6579:2002

One of the two establishments audited was required to meet the basic FSIS regulatory requirements for *Salmonella* testing and was evaluated according to the criteria employed in the United States' domestic inspection program in association with the above equivalent measures. No deficiencies were identified concerning these testing requirements.

13.3 Species Verification

Species verification testing was being conducted as required.

13.4 Monthly Reviews

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

13.5 Inspection System Controls

The CCA had controls in place for ante-mortem and post-mortem inspection procedures and dispositions; restricted product and inspection samples; disposition of dead, dying, diseased or disabled animals; shipment security, including shipment between establishments; and prevention of commingling of product intended for export to the United States with product intended for the domestic market.

In addition, controls were in place for the importation of only eligible meat products from other counties for further processing.

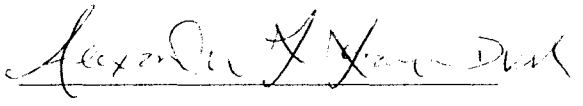
Lastly, adequate controls were found to be in place for security items, shipment security, and products entering the establishments from outside sources.

14. CLOSING MEETING

A closing meeting was held on March 22, 2006, in London with the CCA. At this meeting, the preliminary findings from the audit were presented by the auditor.

The CCA understood and accepted the findings.

Alexander L. Lauro, DVM
Senior Program Auditor



15. ATTACHMENTS TO THE AUDIT REPORT

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

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO	4. NAME OF COUNTRY
Grampian Country Pork Limited Hugden Way Malton, North Yorkshire	03 14 06	UK 2060 EC	Great Britain (England)
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. Alexander L. Lauro		[X] ON-SITE AUDIT [ ] 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
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan.	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	X
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	X
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

City and Country: Malton, Great Britain (England)
Establishment = UK 2060 (Slaughter/Processing)
Audit Date: 03/14/06

15/51. The critical limit (CL) associated with the CCP for carcass chilling addressed only surface temperature (7 ° Celsius) without a reference to time. Review of the establishment's hazard analysis determined that this CCP was established to control the growth of microbial pathogens. From a scientific standpoint, the parameters of both time and temperature should be utilized to describe the growth-curve of microorganisms, for which the current design of this CCP cannot assure that pathogen growth is controlled. No further documentation was provided by the establishment to support the omission of the time parameter from this CL (9 CFR 417.2(c)(ii)).

61. NAME OF AUDITOR
Dr. Alexander L. Lauro

62. AUDITOR SIGNATURE AND DATE
Alexander L Lauro 3/14/06

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
ABP Connect – Cold Storage Limited Corporation Road, King George Dock Hedon Road, Hull HU9 5NF	3/15/06	UK 2182 EC	Great Britain (England)
	5. NAME OF AUDITOR(S)	6. TYPE OF AUDIT	
	Dr. Alexander L Lauro	[X] ON-SITE AUDIT [ ] 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
7. Written SSOP	O
8. Records documenting implementation.	O
9. Signed and dated SSOP, by on-site or overall authority.	O
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	O
11. Maintenance and evaluation of the effectiveness of SSOP's.	O
12. Corrective action when the SSOPs have failed to prevent direct product contamination or adulteration.	O
13. Daily records document item 10, 11 and 12 above.	O
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	O
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	O
16. Records documenting implementation and monitoring of the HACCP plan.	O
17. The HACCP plan is signed and dated by the responsible establishment individual.	O
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	O
19. Verification and validation of HACCP plan.	O
20. Corrective action written in HACCP plan.	O
21. Reassessed adequacy of the HACCP plan.	O
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	O
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	O
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	O
28. Sample Collection/Analysis	O
29. Records	O
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	O
31. Reassessment	O
32. Written Assurance	O

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	O
34. Species Testing	O
35. Residue	O
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	
52. Humane Handling	O
53. Animal Identification	O
54. Ante Mortem Inspection	O
55. Post Mortem Inspection	O
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

City and Country: Hull, Great Britain (England)
Establishment # UK 2182 EC (Cold Storage)
Audit Date: 03/15/06

There were no significant findings to report after consideration of the nature, degree and extent of all observations.

61. NAME OF AUDITOR	62. AUDITOR SIGNATURE AND DATE
Dr. Alexander L. Lauro	Alexander L. Lauro 3/15/06

Room 403c
1A Page Street
London
SW1P 4PQ

Tel 020 7904 6169
Fax 020 7904 6364
e-mail: nick.coulson@defra.gsi.gov.uk
website www.defra.gov.uk

defra
Department for Environment
Food and Rural Affairs

Your reference:
Our reference: EXM 1639 A

(By fax: 00 1 202 690 4040)

Dr Sally White
Director
International Equivalence Staff
Office of International Affairs
USDA FSIS
1400 Independence Avenue
Washington, D.C. 20250

6 September 2006

Dear Dr White

DRAFT FINAL REPORT OF FSIS ON-SITE AUDIT OF GREAT BRITAIN'S MEAT INSPECTION SYSTEM: 10 – 22 MARCH 2006

Thank you for your letter of 27 June 2006, which enclosed a copy of the draft final audit report of the FSIS on-site audit carried out in March 2006 by Dr Alexander Lauro D.V.M. The letter and enclosure was forwarded by the US Embassy in London and was received in this office on 11 July 2006.

There are a few issues included in the draft audit report on which we would like to offer the following comments:

Paragraph 6.1.3 - Assignment of Competent, Qualified Inspectors

Dr Lauro made the determination that no additional formal training had been provided to the local inspection offices which were reviewed during the last 12 months. I should, however, advise you that the Meat Hygiene Service (MHS) implements a compulsory programme of a minimum of two days continuous professional development (CPD) per annum for all veterinarians working within the MHS. The Royal College of Veterinary Surgeons (RCVS), the governing body of the veterinary profession in the UK, recommends a minimum CPD period of 105 hours over three years, i.e. 35 hours per year. In order to meet this recommended requirement, additional CPD is provided by the various contracting companies who employ a large number of veterinarians working in the MHS. There is also a requirement for a minimum of a one day compulsory CPD session for meat inspectors, reinforced by access to computer-based training modules.

In August 2005, CPD was provided by the MHS regarding the implementation of the new hygiene rules in meat premises. Further guidance on the rules concerning exports of cattle was also provided as a CPD subject in November 2005.

Records of staff attendance at CPD courses are maintained at the MHS Regional Offices, however on the day of Dr Lauro's visit the Regional Director responsible for the North Regional Office was unavoidably absent. It is possible, therefore, that the necessary evidence that regional inspection staff had attended CPD courses was not presented at the time. This may account for this particular finding in the report, however I can again give my assurance that all MHS inspectors and Official Veterinarians are required to attend CPD sessions arranged by the MHS and are also obliged to meet the minimum RCVS recommendation for CPD. I also understand that many MHS staff attend more than the specified minimum number of training courses.

Paragraph 11.2 – HACCP Implementation

We accept the finding that the critical limit associated with carcase chilling addressed only temperature and not time. This deficiency has been addressed by the establishment operator by the introduction of a time element to the CCP on temperature controls.

Paragraph 12 – Residue Controls

We also accept Dr Lauro's finding at the Laboratory of the Government Chemist (LGC) that the specified turnaround time of 90% of laboratory results within a period of 28 days or less has not been met for the second year running. We have discussed this repeated non-compliance with our colleagues in the Veterinary Medicines Directorate and have been advised that since the audit there has been an improvement in the turnaround times at LGC. The laboratory is putting in place a range of measures designed to increase their analytical resources and provide extra contingency capacity. It is expected that this will improve their turnaround times and therefore their ability to meet the 90% target.

Paragraph 13 – Enforcement Controls

The Meat Hygiene Service has overseen the corrective action being taken by the establishment operator to rectify the deficiency at paragraph 11.2.

Summary

In general, we were pleased with the favourable outcome of the 2006 audit. This is particularly welcome in view of the considerable amount of construction work that had been carried out during 2005 and 2006 at Grampian Country Foods, Malton to ensure adequate separation of the USDA-approved slaughterhouse and cutting premises from the non-approved meat products areas of the factory.

We were also pleased to reach agreement on the equivalence of the Salmonella testing methods, as described in BS EN ISO 6579:2002, with the testing protocols for *Salmonella spp* currently employed by FSIS.

Thank you for the opportunity to comment on the draft report and we hope that these comments are acceptable to FSIS. We look forward to our continuing close co-operation in maintaining our export trade in pig meat to the United States.

Kind regards.

Yours sincerely

Nick Coulson

Dr Nick Coulson
Head, International Animal Health Division

cc: Dr Besa Kotati, Minister Counselor, US Embassy, London
(by fax: 020 7894 0031)
James Hughes (e-mail: James.Hughes@fco.gov.uk)
Lorenzo Terzi, DG SANCO E3